

Action Plan commitments	October 2021 Progress Report
<p>1. NSF will explore the development of a webpage or web landing site to provide information on NSF’s tribal consultation planning and practices. For example, NSF would post this Action Plan, as well as the materials from the Town Hall with Tribal Nations, to such a webpage so that Tribal Nations would have an easily accessible opportunity to review them.</p>	<p>NSF posted the Action Plan and materials from the Town Hall with Tribal Nations to an initial webpage in May 2021: NSF Response to the Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships. This link was shared with Tribal Nations as a follow-up to the Town Hall. NSF will continue to post materials related to tribal consultation, including this progress report. NSF is currently developing a more comprehensive and permanent website for Tribal Nation consultation and related activities. Note that tribal engagement efforts have been emphasized internally as well, through enhancements to standard training for Program Officers and several presentations to increase awareness about Tribal Nations.</p>
<p>2. NSF will continue to assess comments from Tribal Nation Leaders, as well as other tribal members and Indigenous researchers, submitted during the NSF Director’s Town Hall with Tribal Nations and in writing through June 11, 2021, to continue to identify topics for future listening sessions.</p>	<p>The Action Plan posted in April 2021 contained verbal and written comments received through April 14, 2021. NSF continued to receive written comments through June 11, 2021. The comment matrix has been updated to include all comments received and is attached. NSF is using these comments, as well as input on best practices from experts, to inform the planning of future listening sessions.</p>
<p>3. NSF will hold additional listening sessions with Tribal Nation Leaders and/or other Tribal Nation members to build relationships and to continue to identify areas for improvement. Consideration will also be given to holding these listening sessions in different regions.</p>	<p>NSF will continue to engage with Tribal Nations and Indigenous researchers via listening sessions and additional written comments. NSF intends to hold listening sessions for Tribal Nation leaders (or their designees) on at least two topics based primarily on comments received, with multiple meetings held for each topic to accommodate the schedules of Tribal Nation leaders. These listening sessions will occur during FY22. Tribal Nation leaders will be invited via email to attend the listening sessions; dates and times for the listening sessions will also be posted on the website.</p>

<p>4. Based on NSF’s review of the input received during the: a) Town Hall; b) written comment period; c) additional listening sessions; and d) internal comments raised during preparation of this Action Plan, NSF will develop further and specific actions to address the potential areas to enhance NSF’s tribal consultation practices.</p>	<p>NSF will continue to engage with Tribal Nations (see above). This engagement will ultimately inform any recommendations to the Director on pathways to enhance NSF’s tribal consultation practices. NSF’s commitment to strengthen Tribal Nation consultation and engagement will be an important component of any such recommendations.</p>
<p>5. Pursuant to the Presidential Memorandum, NSF will submit, within 270 days and annually thereafter, a progress report on the status of each action item included in this Action Plan, together with any proposed updates. NSF will therefore submit an update on implementation of the above four action items, as well as any new actions identified during consultation with Tribal Nations, by October 22, 2021.</p>	<p>The above constitutes NSF’s first progress report on its Action Plan.</p>

Overview:

On March 22, 2021, the Director of the National Science Foundation (NSF), Dr. Sethuraman Panchanathan, invited Tribal Nation leaders to attend a virtual Town Hall with Tribal Nations on April 6, 2021. This engagement was a component of NSF’s response to the January 2021 [Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships](#). The Director NSF invited Tribal Nation leaders’ input on:

1. How can NSF better identify and address concerns of American Indian and Alaska Native Tribal Nations (Tribal Nations) relating to NSF's support for science and engineering research and STEM education?
2. Are there barriers to accessing NSF programs and, if so, how can NSF best reduce or eliminate those barriers?
3. How would Tribal Nations prefer NSF to consult with them? What steps can NSF take to improve this consultation effort?

After invitations were sent to the 574 federally recognized Tribal Nations, NSF received 93 registrations from those outside of NSF. NSF invited additional, written comments (through June 11, 2021) from Tribal Nations on the above questions as well as on its [Action Plan of the National Science Foundation to Enhance Tribal Consultation](#). Eight individuals provided verbal statements during the Town Hall, three of whom also provided written comments, and NSF received comments from an additional nine individuals during the written comment period. The Action Plan provided, as an appendix, a summary of the verbal and written comments submitted through April 14, 2021. The below list of comments includes those comments as well as those submitted during the remainder of the comment period. Comments have been anonymized and, in some cases, summarized to convey key concepts.

Comments submitted by Tribal Nation leaders, members, and Indigenous researchers:

1	NSF should aspire to the principles of free, prior, and informed consent.
2	"Nothing about us without us."
3	Past research practices ignored tribal community needs.
4	NSF should adhere to the principle of community engaged scholarship, with tribes driving the research narratives.

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5	To what lengths does NSF encourage collaborative principles that seek to aspire to true community- engaged scholarship?
6	These dialogues must be focused on points of leverage for tribal communities.
7	Tribal community members have been the subject of study, as if we are anthropological curiosities, from outside institutions for much too long.
8	Our tribal community and tribal university and land grant university tribal faculty proposals are set aside when [a prestigious university] proposes to come into Oklahoma or the Dakotas to evaluate or study us. That has to stop, now. That is a form of exploitation at the academic level that is way past acceptance.
9	Indigenous people have unique cultures for each tribe/band that must be considered individually.
10	The commenter hopes that NSF is serious about engaging with Tribal Nations.
11	There is a difference between tribal engagement and informing; NSF really needs to co-design this engagement planning with Tribal Nations.
12	We need greater emphasis on the issues of data sovereignty, data education, and data governance.
13	Language revitalization and sustainability is critical.
14	NSF should consider consulting on a regional basis, particularly with issues like climate change.
15	NSF should recognize the importance of the unique status as Tribal Nations.
16	Rural communities face challenges in developing competitive proposals.
17	There is a sense of loss of the multiple benefits of NSF investment, including ultimately STEM graduates, with the loss of grants.
18	Regional meetings have value, so NSF can understand common challenges.
19	NSF should create an Indigenous peoples office to address concerns and build a bridge (to Indigenous science and perspectives).

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20	NSF should provide a set of guidelines for reviewers who are evaluating proposals, to elevate how Indigenous scholars and community members are included in proposals.
21	NSF deadlines are incongruent with how Tribal Nations govern and tribal colleges run.
22	Indigenous people should be elevated in terms of their involvement, with their unique expertise acknowledged, not included just to have a higher score.
23	Many academic researchers have been trying to train graduate students to take the role of native speakers very seriously when they do work with Tribal language communities and to identify the responsibilities they have with regard to the speakers.
24	Indigenous data scientists and scholars/researchers should provide input into guidelines for reviewers, in addition to Tribal Nation leaders.
25	Early consultation with tribal members on language research is extremely important.
26	The role of native language speakers should be elevated from consultant position to research collaborator and should include authorship of products.
27	Accessibility (to information, funds, and resources from NSF) is a major issue for many tribes in isolated regions.
28	Accessibility to collaboration is a major issue due to language and educational barriers. Many Alaska Natives are ESL or lived with ESL people and complicated STEM jargon is unfamiliar to many of them.
29	Oral communication (sharing) is an important means of communication with the Alaska Natives the commenter represents. They have invaluable knowledge to share, but language barriers complicate sharing.
30	Collaboration in research is very important to Alaska Natives, for example, to protect their environment.
31	State and Federal participants should have a deeper general understanding of the linguistic and cultural knowledge base communications when interacting with tribal leaders, and cultural awareness throughout context is paramount.

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32	NSF can consult with tribes regarding what the tribal research agenda is and seek to support that research.
33	NSF can help tribes develop basic research capacity both applied and theoretical.
34	NSF can do a thorough and systematic review of cultural bias within its selection and granting processes. It should also undertake a nuanced and detailed review of its internal structures for issues of systemic racism and bias. It should particularly address issues of equity.
35	Indigenous researchers should be funded at levels and frequencies proportionate to non-Indigenous researchers.
36	Tribal Nations should be included in all documentation and solicitation on a level equivalent to States.
37	NSF should undertake a process to identify a liaison in each tribal governmental structure. This would be somebody who has research experience and credibility both within the tribal community and with external research bodies and entities.
38	NSF should attempt to inform tribes of any research going on within their tribal jurisdiction or involving tribal members or citizens.
39	Please expand your vision to recognize that tribal students are participating in education across the nation, and explicitly avoid the separate but equal notion of TCUs as the primary process for engaging tribal communities.
40	Community Engaged Scholarship is the key. Please consider reevaluating what informed consent means and consider only funding external institutions to work with tribal communities when the communities are fully engaged with shared resources.
41	Please avoid the temptation to adopt a pan-Native attitudes about how to engage tribal communities. Please consider developing a community of Native American scholars to help bridge communications and establish priorities for engagement.
42	Researchers coming to community after the award is made and with no funds to support the work of the Indigenous partners is not true partnership
43	The commenter is concerned about (non-TCU) proposals about Indigenous peoples, knowledges, and data that are being funded that: 1) treat Indigenous peoples and TCUs as recruitment centers for extractive work that does not benefit

	Indigenous communities, 2) serve only to propel the academic careers of non-Indigenous PIs (a form of extraction), 3) do not critically ask about power imbalances about the Indigenous people involved in the grant work.
44	There are problems with tribal involvement in research; guidelines (to grant applicants) should be developed to address: <ul style="list-style-type: none"> •Indigenous PIs and/or other Indigenous people with decision-making authority should be included in proposals involving Tribal communities; •Respect for Indigenous expertise •Proposals should be written to benefit tribal communities and TCUs, with definition of "benefit" defined by the community rather than by the researcher •Data sovereignty must be protected; data security should be managed by tribal communities.
45	Review of proposals involving Indigenous people, knowledges, and data should seek to identify: <ul style="list-style-type: none"> •Is there an Indigenous PI? If that person is "junior" in academic-colonial sense, are there structures in place to ensure that person can voice concerns without censure or professional risk? •Are Indigenous people included with any real decision-making authority on the project? •For education, have the PIs worked with TCUs or Indigenous students before? •Do TCUs or community benefit meaningfully or are they just seen as recruitment sites of students and instructors? •Is there thoughtful reflection on how data generated from the project will be protected or stewarded by Indigenous people?
46	Inclusion is not the same as equity. Using tribal data/citations without empowering tribal communities is not supporting equity.
47	Tribal leaders as advisors have limitations. They have many responsibilities, are subject to change when their term expires, and may not be familiar with research related issues. Therefore, NSF should include Indigenous researchers/academics in the consultation process.
48	The nation-to-nation approach disenfranchises non-federally recognized tribes and urban Indians.
49	Funding for digital archiving of languages is needed.
50	The zoom webinar format was very awkward for participants who were speaking; phone interface is more stable and accessible for our rural and remote communities.
51	Not acknowledging a comment is a significant sign of disrespect.

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52	Proposal solicitations/announcements should clearly state that if the research project or outcomes impact Tribal Nations, directly or indirectly, that tribal consultation is required.
53	How do Program Officers identify whether proposed research activities may affect tangible or intangible resources of importance to Indigenous Peoples (what is the formal process)?
54	There is a need for an NSF office devoted to Tribal Nations, Pacific Islanders, and Indigenous Peoples. On both sides of this there is a lack of understanding and knowledge of the needs, desires, world views, and obstacles that does an injustice to the advancement of knowledge and society. A well-structured office within NSF would allow the shortfalls to be addressed in a respectful manner on a continuing basis. It would also open avenues of research and advancement of goals that, before now, have not been pursued due to the aforementioned obstacles.
55	The process to develop the Action Plan is not equitable or inclusive to Tribal Nations; the Town Hall format creates a negative power dynamic.
56	The Indigenous worldview is relational; having NSF leadership and Program Managers have relationships is important; the TCUP Program Manager at the Town Hall could be a model for other programs in terms of her relationships, skills, and ways of running the program.
57	NSF Program Managers should attend Indigenous conferences just as they attend science conferences, in order to understand what is beneficial for Indigenous Peoples and to develop relationships with Indigenous leaders.
58	NSF should model what they want projects to do, including co-producing Navigating the New Arctic at the program level. Putting it all on NNA-CO to fix after the fact is putting the cart before the horse and will have limited effect.
59	Southeastern Alaska includes 17 federally recognized local tribal governments, a regional tribal government, a regional corporation and numerous ANCSA villages; the EO and memoranda only refer to federally recognized tribes.
60	Requiring PIs to include a letter of support from the federally recognized tribal government that is potentially affected by the proposed activities, along with their proposal applications, could allow for early resolution of issues and could limit or eliminate the need for NSF to consult with the tribe.
61	Sitka Tribe of Alaska's Tribal Consultation Policy (submitted with the comment) has proven to be successful at resolving research-related conflicts prior to funding application submission.
62	NSF-funded projects would benefit from an established NSF tribal consultation policy.