



**Seeking or Obtaining Tribal Nation Approval for Proposals that May Impact  
Tribal Resources or Interests  
([PAPPG Chapter II.E.10](#))  
Frequently Asked Questions (FAQs)  
June 25, 2024**

---

**1. Whose responsibility is it to ensure that the correct Tribal Nation individual/entity has responded to a request for approval?**

It is the proposing organization's responsibility to ensure that the correct Tribal Nation individual/entity has responded to a request for approval.

**2. Will NSF develop a listing of what constitutes "Tribal Nation interests and resources"?**

Due to the broad range of projects funded by NSF and the uniqueness of individual Tribal Nations, it is not possible for the Foundation to develop a comprehensive list of what constitutes "Tribal Nation interests and resources". The Foundation has, however, included examples in the PAPPG. The general application of the language is initially limited to Tribal lands or those aspects of Tribal life that are within the domain of the Tribal Nation (as opposed to individual Tribal members), including but not limited to Tribal languages and subsistence rights on Tribal Nation lands. In addition, the proposing organization will need to obtain permission from the Tribal Nation(s) if the Tribal Nation(s) is invoked in any way (including but not limited to referring to the Tribal Nation(s) in materials, public forums, or publications).

**3. Does NSF have a recommended or required process for Tribal Nations to review and provide or deny approval of a research request?**

As sovereign entities, it is up to each Tribal Nation to determine its process for reviewing requests for permission to conduct research that may impact its interests or resources. Such processes may include the establishment of terms and conditions regarding data ownership and use, project-related

publications, and other relevant project activities, and/or the assessment of fees to cover the cost of reviewing requests for permission.

**4. Are non-federally recognized Indigenous communities covered under this new PAPPG language?**

The new PAPPG language only applies to federally recognized Tribal Nations. NSF recognizes that there are challenges to including non-federally recognized Indigenous communities and continues to explore ways to include these communities in the agency's policies.

**5. Is there a timeline for obtaining the approval?**

The intent of this new language is to ensure that Tribal Nation interests and resources are respected and recognize that Tribal Nations, as sovereign entities, have the authority to determine whether approval is given for projects if Tribal Nation interests or resources may be impacted by proposed research. NSF strongly encourages PIs to engage in meaningful collaboration with relevant Tribal Nations as early as possible to allow time for those potentially impacted Tribal Nations to learn about the proposed research and consider whether approval should be given. Strong relationships with Tribal Nations will help to facilitate the process. A proposal can be submitted to NSF for review without secured Tribal Nation(s) approval if there is an indication that such approval has been requested and is pending. No proposal will be awarded until written approval (or confirmation that Tribal Nation review and approval is not required) from the relevant Tribal Nation(s) is submitted to NSF.

**6. What guidance can NSF provide potential PIs if they plan to work with Tribal Nations?**

A trusting relationship between the PI, any co-PI(s), and other senior/key personnel, and the Tribal Nation is imperative to working together successfully. PIs must be prepared to commit time to relationship building and gaining the trust of the communities they wish to work with in advance of fully developing and submitting proposals to NSF. The PI should also be prepared to clearly discuss with the Tribal representatives the benefits and risks of the proposed project to the Tribal Nation. Opportunities for co-designing projects should also be explored with Tribal Nations. In addition, researchers should

reach out early to the relevant Tribal Nation(s) to learn what that Tribal Nation's approval process entails.

## **7. Won't this requirement put a heavy burden on Tribal Nations?**

As sovereign entities, Tribal Nations hold authority to determine the processes for considering proposed projects for approval and the timeline for completing those processes. Tribal Nations can place terms and conditions when issuing an approval, including the imposition of fees to support the work required to review proposals submitted to them for approval.

## **8. What are examples of proposed activities that may require approval from Tribal Nations?**

In addition to the examples provided in the [PAPPG](#), other examples include, but are not limited to:

1. Activities that involve information from any Tribal citizen on the use of Tribal artifacts or items of cultural importance to Tribes;
2. Activities that collect participant data that may be attributed to a Tribal Nation;
3. Activities that involve the use of information from Tribal citizens on their collective ways of doing and knowing (e.g., Indigenous methods of hunting, fishing, agricultural practices, traditional medicines, etc.);
4. Project activities involving flora and fauna on Tribal reservations;
5. Research methods that involve interaction with Indigenous language users; and
6. Community-based participatory research that collects data directly from participants.

## **9. What are examples of proposed activities that do not require approval from Tribal Nations?**

Some examples include but are not limited to:

1. Conferences, symposia, and workshops that do not involve collecting information (e.g., through surveys) that identifies specific Tribal Nations or citizens of Tribal Nations;

2. Internships, scholarships/fellowships, training, and research experience programs that do not require individual identification of a Tribal Nation affiliation; and
3. Outreach to K-12 schools, including Tribal schools, as part of a project's proposed Broader Impacts.

**10. If a research project calls for volunteers to participate in research, and Tribal citizens volunteer in this study, is approval from the pertinent Tribal Nations needed before the volunteers can participate in the study?**

If the Tribal Nation citizens who volunteer in this study will not be asked to reveal their Tribal affiliation, the Tribal Nation's approval may not be needed. If, however, Tribal citizens (whether living on or off a Tribal Nation's reservation) volunteer to participate in the study and their Tribal affiliation will be part of the data collected, then approval from their Tribal Nation (or confirmation that Tribal Nation review and approval is not required) must be obtained. Whenever a Tribal Nation's citizens may be involved in research and the Tribal Nation's name is included in the project, the proposer must check with the Tribal Nation for its requirements regarding approval for participation in the research. Any data or information that connects a Tribal Nation's citizen(s) to a particular Tribal Nation will be viewed as representative of that Tribal Nation and the Tribal Nation may be concerned about how its citizens are depicted in these studies.

**11. If an enrolled member of a Tribal Nation is identified as a PI, co-PI, or other senior/key person on the proposal, is Tribal Nation approval still required for the conduct of the research?**

Yes. Approval to conduct the research involving the interests and resources of Tribal Nation must come from the Tribal Nation official(s) designated by the Tribal Nation, even if a member of the relevant Tribal Nation is identified as a PI, co-PI, or other senior/key person on the proposal.

**12. If the proposer has previously worked with a Tribal Nation, is approval required for a new proposal?**

NSF will require Tribal Nation approval (or a document from the Tribal Nation indicating that such approval is not required) for each new proposal.

**13. If a proposer intends to study subsistence practices (such as traditional food gathering, tools use, or use of medicinal plants) for a particular Tribal Nation(s), what is the proposer required to do?**

It will be important to build a relationship with the relevant Tribal Nation prior to conceptualizing and submitting the proposal. This process will require time and the researcher may need to collaborate with the Tribal Nation(s) to identify acceptable research methods/methodologies and develop the research design.

Approval from the Tribal Nation to conduct the research or a document from the Tribal Nation indicating that such approval is not required must be submitted before an award will be made.

**14. Can a Tribal Nation delegate its approval authority to another entity or individual, including a non-profit organization or consortium?**

Yes. A Tribal Nation can delegate its approval authority to any entity or individual of its choosing.

**15. Can a Tribal Nation revoke a previously provided approval for an NSF-funded project?**

Yes. As a sovereign nation, a Tribal Nation can revoke its approval for the NSF-funded project at any time. In such a case, NSF would work with the Tribal Nation and the organization to address the situation.