

Action Plan of the National Science Foundation to Enhance Tribal Consultation in Response to Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships

Introduction

In accordance with the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions, the National Science Foundation (NSF) is committed to respecting the sovereignty and self-governance of federally recognized American Indian and Alaska Native Tribal Nations (Tribal Nations). NSF also renews its commitment to sustained, meaningful, and robust consultation with Tribal Nations during the process of carrying out its mission. In recognition of these commitments and pursuant to the January 26, 2021 [Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships](#) (Presidential Memorandum), NSF has prepared this Action Plan of the National Science Foundation to Enhance Tribal Consultation (Action Plan).

Background

NSF is an independent federal agency created by Congress in 1950 "to promote the progress of science; to advance the national health, prosperity, and welfare; to secure the national defense..." With an annual budget of approximately \$8.5 billion (FY 2021), NSF is the funding source for approximately 27 percent of all federally supported basic research conducted by America's colleges and universities. NSF fulfills its mission chiefly by issuing limited-term grants or cooperative agreements (currently nearly 11,000 new awards per year, with an average duration of three years) to fund specific research proposals that, out of approximately 43,500 proposals, have been judged the most meritorious by a rigorous and objective merit-review system. Most of these awards go to institutions supporting individual or small groups of investigators. Other awards provide funding for research centers, instruments and facilities that allow scientists, engineers and students to work at the outermost frontiers of knowledge. NSF also funds equipment and infrastructure needed by scientists and engineers but is often too expensive for any one group or researcher to afford. Examples of such major research equipment include optical and radio telescopes, Antarctic and Arctic research sites, high-end computer facilities, very large bandwidth network connections, ships for ocean-based research, sensitive detectors of very subtle physical phenomena and gravitational wave observatories.

One of the major obstacles that NSF faces is identifying when proposals touch on the interests of Tribal Nations. This challenge is because proposals for NSF funded research activities are prepared and submitted by researchers typically without direct NSF input, and it can be difficult to determine the level of involvement by Tribal Nations that has occurred prior to each proposal's submission. NSF is nevertheless committed to improving its screening process for proposals that have the potential to touch on the interests of Tribal Nations. NSF also looks forward to working with Tribal Nations and the research community to find more effective ways to ensure that Tribal interests are both identified and addressed prior to proposal submission and before funding decisions are made.

The areas of NSF's work that often touch on the interests of Tribal Nations include but are not limited to the four major categories described below.

Tribal Colleges and Universities Program (TCUP)

The first Tribal Colleges were established in the late 1960s and 1970s. NSF's relationship with Tribal Colleges and Tribal Nations extends to the late 1970s with the Minority Institutions Science Improvement Program (MSIP), and Experimental Program to Stimulate Research (EPSCoR). In the mid-1990s the Tribal College Rural Systemic Initiative (TCRSI) was added. An important program for these institutions is the Tribal Colleges and Universities Program (TCUP), which began in 2001. TCUP promotes high quality science, technology, engineering, and mathematics (STEM) education, research, and outreach at TCUP-eligible institutions. Proposals to the TCUP program are submitted by TCUP-eligible institutions led by faculty and administrators who have identified STEM opportunities that align with the values and interest of their community. The TCUP's focus is on building the institutional capacity for STEM education and research in TCUP-eligible institutions. It supports Tribal Colleges and Universities (TCUs) in the development and implementation of associate, bachelor's, and master's degrees in a variety of STEM fields. Support for research, design, and infrastructure led to the development of TCU Enterprise Advancement Centers at TCUP-eligible institutions. These Centers build on the capacity developed through earlier investments, to deliver on partnerships with tribal communities in areas such as advanced manufacturing, food, energy, water, food sovereignty, subsistence, and clean environments. These projects have direct benefits to Tribal Nations by providing workforce training and higher education for Tribal members, enhancing local research capacity, providing community-based education programs, producing research from an Indigenous perspective, providing solutions to environmental and engineering issues of concern to Tribal Nations, laying the foundation for STEM entrepreneurship, and often serving as an intellectual and cultural hub for rural and remote communities.

Arctic Research Activities at NSF

NSF supports investigators conducting research in and about the Arctic region and its connection to global systems through the Arctic Sciences Section in the Geosciences Directorate's Office of Polar Programs, through cross-Directorate activities such as the Navigating the New Arctic (NNA) program, and a variety of programs in other NSF Directorates. The Arctic region has exceptionally long natural climate records and thousands of years of human settlement and is also among the most sensitive regions to environmental change. This interplay provides a unique basis for integrated research on global systems and human adaptation. At the same time, Alaska is home to 40% of federally-recognized Tribal Nations.

NSF-funded researchers are expected to adhere to the [Principles for Conducting Research in the Arctic](#), a set of research principles from the Interagency Arctic Research Policy Committee (IARPC) that emphasizes appropriate behavior, communication, and stewardship practices when working on or near Tribal lands, in communities, and/or with Indigenous Peoples. Following the revision of these Principles in 2018, NSF solicitations for Arctic research refer to the Principles and include compliance with them as an additional award condition. In addition, NSF's Arctic Research Support and Logistics Services contractor has subcontracted with Utqiaġvik Iñupiat Corporation (UIC) Science to provide training to researchers prior to fieldwork and to develop online training modules to better enable researchers to comply with the Principles and conduct effective [local engagement](#). To describe many of NSF's efforts to support tribal engagement in the Arctic, NSF created the [Arctic Research Engagement](#) website.

Depending on the nature of the projects, government-to-government consultation is conducted prior to award. For other projects, engagement and communication may occur prior to and/or during fieldwork. Consultation may result in an agreement to share results or project outcomes, which NSF encourages

whenever appropriate. Indigenous partners are integral to co-production of new knowledge, community-based participatory research, community-based observing or other approaches to engagement between researchers and Indigenous communities. The Arctic Sciences Section developed a special call for proposals to support engagement through the [Dear Colleague Letter: Potential Support for Community Hubs for Collaborations Between NSF-Funded Researchers and Arctic Residents](#). The NNA program is one of NSF's cross-Directorate Ten Big Ideas that addresses complex challenges in the Arctic region through a convergence research approach. Current NNA awards focus on the intersection between the natural, social and built environments and several are led by or involve partnering with Arctic Indigenous Peoples. The activities outlined in this Action Plan are integral to ongoing efforts to improve consultation and engagement with Tribal Nations in order to advance our understanding of the changing Arctic.

Social, Behavioral & Economic Sciences Programs

The Directorate for Social, Behavioral & Economic (SBE) Sciences supports research to advance scientific knowledge about people, human behavior, and social organizations. This knowledge furthers NSF's mission to advance public health, education, and welfare, and is critical to the well-being of Indigenous peoples and Tribal Nations. SBE supports projects that contribute to the development of the next generation of researchers, especially from Tribal communities, and encourages proposal submission by Indigenous scholars.

The Native American Languages Act, passed by the U.S. Congress in 1990, enacted into policy the recognition of the unique status and importance of Native American languages. The Dynamic Language Infrastructure – Documenting Endangered Languages (DLI-DEL) program supports basic science and capacity-building activities and funds research by a wide range of researchers including Indigenous scholars from TCUs, Tribal Nations, Indigenous language and culture organizations, and other Tribal entities.

Other SBE programs, such as Archaeology, Biological Anthropology, Cultural Anthropology, and Human-Environmental and Geographic Sciences, support Tribal interests through awards to a variety of researchers engaged with relevant research questions, particularly as these pertain to cultural change and understanding the dynamics between people and their environments. In addition, a new SBE program, Build and Broaden 2.0, encourages research collaborations between scholars at minority-serving institutions such as TCUs and scholars in other institutions or organizations.

Environmental Reviews/Consultation under Section 106 of the National Historic Preservation Act

While the categories above are focused on research and building capacity for Indigenous communities and institutions, this category of NSF work applies to research across NSF's Directorates, regardless of whether it is focused on programs such as those described above. This work involves NSF's role in carrying out environmental and historic preservation reviews of proposals prior to making funding decisions. An important part of this work is the identification of proposed research activities that may involve Tribal interests, particularly in reviews under Section 106 of the National Historic Preservation Act (Section 106), as well as during National Environmental Policy Act reviews. In screening proposals, Program Officers seek to identify whether proposed research activities may affect tangible or intangible resources of importance to Indigenous Peoples, including such resources as sacred mountains, ancestral burial grounds, traditional subsistence hunting grounds, and sites used for rituals or cultural practices. In one recent example, this screening process allowed the Program Officer to identify that a proposed antenna array was to be sited on the ancestral lands of a Tribal Nation. NSF, through its Tribal Liaison,

was able to consult early and in a thorough manner to enable the siting of the instruments in locations that were acceptable to the Tribe. The screening of proposals to identify such potential interests can, however, be a challenge. The wide geographic range and subject matter of NSF-funded research, the volume of proposals, and the development of research proposals by Principal Investigators who determine the activities and location of research without NSF input, presents challenges in monitoring projects and their potential outcomes. However, NSF is committed to finding more effective ways to ensure that Tribal interests are both identified and addressed before proposals are submitted and funding decisions are made.

Other NSF Program Areas

In addition to the areas of NSF's work discussed above, there are other areas throughout NSF's Directorates, that may, from time to time, touch on Tribal interests. For example, NSF funds Established Program to Stimulate Competitive Research (EPSCoR) projects that focus on Tribal Nations within their states to promote STEM pathways, increase research opportunities, and build relationships among STEM faculty. Many of these programs support STEM camps for middle and high school students, internships for college students, professional development for STEM faculty, and lab enhancements. In addition, the Research Experiences for Undergraduate (REU) program, funded by all Directorates, is available to students from Tribal Nations and provides them with intensive experiential learning opportunities in STEM fields.

The following are further examples of ways in which individual Directorates or programs have supported projects for Tribal Nations, although this is not a comprehensive list of the many ways that programs support individual projects touching on the interests of Tribal Nations: 1) the Directorate for Biological Sciences (BIO) supports projects in ecology, molecular and cellular biology, and environmental biology that involve Tribal Nations; 2) the Directorate for Computer and Information Science and Engineering (CISE) supports skill development in data science and computing infrastructure for Tribal Colleges; 3) in addition to housing the TCUP program, the Directorate for Education and Human Resources Directorate (EHR) supports research on STEM education, which frequently involves projects with Tribal Nations and TCUs; 4) the Directorate for Engineering (ENG) supports academic programming and advanced manufacturing capacity development at Tribal Nations; 5) the Directorate for Mathematical and Physical Sciences (MPS) supports Partnerships for Research and Education in Materials (PREM), which provides opportunities for educational pathways and research development in materials engineering; 6) in addition, the MPS Division of Astronomical Sciences supports a major astronomical observatory located on the Tohono O'odham Nation with observatory staff working closely with members of the Tribal Nation on educational programming and employment opportunities; and 7) the Directorate for Geosciences (GEO) provides funding for developing educational and career pathways in geoscience fields for students from Tribal Nations (e.g., Improving Undergraduate STEM Education: Pathways into the Earth, Ocean, Polar and Atmospheric & Geospace Sciences (IUUSE:GEOPATHs)). Cumulatively, individual projects supported by these Directorates provide a significant benefit to Tribal Nations.

Overview of NSF's Current Tribal Consultation General Practices

Although each NSF proposal and each Tribal Nation are unique, NSF has followed general practices in carrying out its consultation with Tribal Nations. Below is a description of the various practices currently in place at NSF.

1. NSF has a designated agency official (the NSF Tribal Liaison) to provide advice to NSF staff on carrying out government-to-government consultation with Tribal Nations. (This is the same agency official, Caroline M. Blanco, Assistant General Counsel, that is co-leading the development and implementation of this Action Plan and is responsible for the preparation of progress reports required by the Presidential Memorandum.)

2. NSF has an internal process for screening proposals for NSF funding to determine whether Tribal consultation is appropriate; if consultation is appropriate, the Tribal Liaison is available to assist with the consultation process. For example, NSF has in place a screening tool, the Environmental Impacts Checklist (Checklist), that Program Officers send, when appropriate, to those seeking funding to help identify whether Tribal interests may be impacted by proposed activities. This Checklist requires the Principal Investigator (PI), the researcher who seeks NSF funding through his/her/their institution, to identify potential impacts to environmental resources, including historic, cultural, or archaeological resources. Importantly, the Checklist also asks whether the proposal involves activities that would take place on lands or waters in which American Indians, Alaska Natives, or Native Hawaiians have an interest or connection. The instructions attached to this Checklist ask the researcher and his/her/their institution to consider whether the proposed activities may affect tangible or intangible resources of importance to Indigenous Peoples, regardless of where those resources are located. Examples of such resources include sacred mountains, ancestral burial grounds, traditional subsistence hunting grounds, and sites used for rituals or cultural practices. Currently, the use of this Checklist is optional, based, in part, on whether the relevant NSF Program Officer identifies the potential for impacts by the proposed research activities.

Another way NSF screens proposals for impacts on Tribal interests is through Institutional Review Boards (IRBs). NSF requires PIs to obtain approval of research protocols from IRBs for research involving human participants. NSF typically requires IRB approval from the submitting institution's IRB; however, Tribal Nations have increasingly formed independent research review boards (Tribal IRBs) to review research conducted on Tribal lands or with members of a Tribal Nation. NSF programs that frequently work with Tribal Nations are increasingly requiring Tribal IRB approval in addition to the institution's IRB approval. With authority over research explicitly acknowledged in the revised Common Rule (45 C.F.R. 46), Tribal IRBs review research for the protection of individual participants and also for protection of their communities. Some Tribal IRBs extend review authority to include important cultural resources such as plant, animal, environmental resources, and cultural knowledge. These additional reviews may disqualify projects that have previously received non-Tribal IRB approval, as non-Tribal IRBs may not understand Tribal systems, values, and evaluation of risks and benefits important to the Tribal Nation (Around Him, *et al.* 2019).

3. NSF engages with Tribal Nations either through the government-to-government consultation process or via the Section 106 consultation process to obtain and use input from Tribal Nations.

4. When reaching out to Tribal Nations, NSF uses the BIA official list of Tribal Nations and contact information, supplemented by additional Tribal Nation contacts that NSF has gathered over time.

5. NSF typically seeks input from Tribal Nations either through the government-to-government consultation process or through the Section 106 process and works with Tribal Nations to ensure a meaningful and respectful process.

6. When NSF carries out its government-to-government consultation processes, it does so with the advice and/or participation of its Tribal Liaison, supported by the relevant Program Officer and other agency officials, as appropriate. The NSF Tribal Liaison helps to determine which agency officials, with the appropriate decision-making authority, should attend the consultation.

7. NSF considers the accessibility and availability of Tribal resources when engaging in consultation. For example, during the pandemic, NSF has been engaging in Tribal consultation via telephone and webinar. Once travel restrictions are lifted, NSF will likely return to its pre-pandemic practice of carrying out consultations in person to the greatest extent practicable, unless other means of consultation are preferred by the relevant Tribal Nation.

8. NSF typically provides notification to Tribal Nations of a request to engage in consultation at least 30 days in advance, unless extenuating or unavoidable circumstances are present. NSF notifies Tribal Nations of its request to engage in government-to-government consultation by letter, unless a different method is recommended by the Tribal Nation.

Actions Taken in the 90 Days Following the Issuance of the Presidential Memorandum

In response to Executive Order 13175, a working team of NSF personnel from across Divisions was assembled, co-led by Caroline Blanco, NSF's Tribal Liaison and Assistant General Counsel in the Office of General Counsel, and Dr. Jermelina Tupas, Deputy Division Director in the Division of Human Resource Development. The team has been using multiple strategies to spearhead the development of this Action Plan, gathering information both internally at NSF and from Tribal Nations to inform the plan. Internal efforts have included conversations with NSF Program Officers/Directors and Division Directors, and the assemblage of a preliminary inventory of NSF awards that touch upon Tribal interests. Additional program-level input was gleaned through a presentation on the proposed Action Plan and conversation with the newly formed Interest Group on Indigenous Communities, comprised of over 20 members from across NSF Directorates. Examination of NSF policy documents by team members provided another internal source of information regarding the agency's current efforts to engage in government-to-government consultation with Tribal Nations.

Input from Tribal Nations and other federal government agency experts has been a critical source of information for the development of the Action Plan. External efforts to date include participating in several conversations with other government agencies that work with Tribal Nations and attending other agencies' meetings with Tribal Nations in the development of their response to the Presidential Memorandum. The NSF team then collaborated to prepare and present the NSF Director's Town Hall with Tribal Nations on April 6, 2021. With over 150 attendees from across the nation, the meeting was headlined by NSF Director Dr. Sethuraman Panchanathan, who provided background information on the agency's work with Tribal Nations and efforts to develop this Action Plan. This was followed by a panel presentation by NSF personnel whose work touches on the interests of Tribal Nations and, most notably, an extensive question and answer period in which Tribal leaders, scholars, and members in attendance provided statements and asked questions of the panel, both orally and through written submission. A recording of the Town Hall meeting will be posted on the newly launched [NSF Arctic Community Engagement website](#), allowing wide public access to those proceedings. To enable additional opportunities for Tribal Nation input, NSF has assigned an email inbox (tribal.engagement@nsf.gov) to receive written comments from Tribal Nations.

Comments received during the Town Hall and submitted in writing through April 14, 2021, have been very valuable and informative. They formed the basis of several of the questions identified in the following section, which will be explored further as NSF works to enhance its government-to-government Tribal consultation practices. NSF will continue to receive comments until June 11, 2021, which will further help in the development of NSF's next, updated Action Plan and in defining the focus of future listening sessions.

Based on the work conducted by the NSF team during the 90 days following issuance of the Presidential Memorandum, including the compilation of comments (verbal and written) received through April 14, 2021, potential areas to address in order to enhance NSF's Tribal consultation practices have been identified:

1. What are best practices for researchers and institutions (including Indigenous researchers and Tribal Colleges/Universities) to follow for early and appropriate engagement with Tribal Nations regarding proposed NSF-funded research (for example, holding regularly scheduled planning sessions during the year)?
2. How can NSF engage Indigenous researchers and Tribal Nations to better respect principles of Tribal sovereignty (for example, establishing advisory groups of Indigenous researchers and/or Tribal Nation representatives to address certain issues)?
3. How can NSF enhance its screening process to better identify when government-to-government consultation is needed?
4. What additional guidance should NSF provide in its policy documents regarding government-to-government consultation with Tribal Nations when interests of Tribal Nations are involved?
5. How can NSF better support engagement between Tribal Nations and researchers?
6. How can NSF increase investments in community-engaged scholarship?
7. How can NSF co-design its engagement planning so that the actions NSF takes are informed by Tribal priorities rather than informing Tribal Nations about NSF's priorities?
8. What can NSF do to make progress on the issues of data sovereignty, data education, and data governance with regard to data and information from Tribal Nations?
9. What can NSF do to reduce the barriers for rural Indigenous communities to develop competitive proposals in areas of research, engineering and education?
10. How can NSF recruit reviewers capable of evaluating the potential impacts of proposed work on Tribal Nations?
11. How can NSF elevate Indigenous scholars and community members to include them in designing and/or submitting proposals?

12. What are good practices for timing solicitation deadlines so that they are congruent with Tribal government and TCU calendars?

13. What internal training should NSF develop to ensure that the proposal review process carefully considers the needs of Tribal Nations?

Path Forward

In order to continue to build relationships with Tribal Nations, to further explore the topics identified above, and to identify concrete steps that NSF can take to enhance its Tribal consultation practices, NSF commits to the following future actions:

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.

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.

3. NSF will hold additional listening sessions with Tribal Nation Leaders and/or other Tribal 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.

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.

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.

Attachment: Matrix of comments received through April 14, 2021

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ATTACHMENT- Comments submitted through April 14, 2021

	Comments from 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
5	These dialogues must be focused on points of leverage for Tribal communities.
6	Indigenous people have unique cultures for each tribe/band that must be considered individually
7	Hoping NSF is serious about engaging with Tribal Nations
8	There is a difference between Tribal engagement and informing; NSF really needs to co-design this engagement planning with Tribal Nations
9	We need greater emphasis on the issues of data sovereignty, data education, and data governance
10	Language revitalization and sustainability is critical
11	NSF should consider consulting on a regional basis, particularly with issues like climate change
12	NSF should recognize the importance of the unique status as Tribal Nations
13	Rural communities have challenges in developing competitive proposals
14	There is a sense of loss of the multiple benefits of NSF investment, including ultimately STEM graduates, with the loss of grants
15	Agreed that regional meetings have value, so NSF can understand common challenges

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16	NSF should create an Indigenous peoples office to address concerns and build a bridge (to Indigenous science and perspectives)-
17	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
18	NSF deadlines are incongruent with how Tribal Nations govern and Tribal colleges run
19	Indigenous people should be elevated in terms of their involvement, with their unique expertise acknowledged, not included just to have a higher score
20	Indigenous data scientists and scholars/researchers should provide input into this set of guidelines, in addition to Tribal leaders
21	Early consultation with Tribal members on language research is extremely important
22	Role of native language speakers should be elevated from consultant position to research collaborator and should include authorship of products
23	Accessibility (to information, funds, and resources from NSF) is a major issue for many Tribes in isolated regions
24	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.
25	Oral communication (sharing) is an important means of communication with the Alaska Natives she represents. They have invaluable knowledge to share, but language barriers complicate sharing.
26	Collaboration in research is very important to Alaska Natives, for example, to protect their environment.

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27	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.
28	NSF can consult with tribes regarding what the tribal research agenda is and seek to support that research.
29	NSF can help tribes develop basic research capacity both applied and theoretical.
30	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 it's internal structures for issues of systemic racism and bias. It should particularly address issues of equity.
31	Indigenous researchers should be funded at levels and frequencies proportionate to non-indigenous researchers.
32	Tribal Nations should be included in all documentation and solicitation on a level equivalent to States.
33	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.
34	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.

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35	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.
36	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
37	There are problems with Tribal involvement in research; guidelines 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•Proposals should be written to benefit Tribal communities and TCUs•Data sovereignty must be protected; data security should be managed by Tribal communities
38	Inclusion is not the same as equity. Using Tribal data/citations without empowering Tribal communities is not supporting equity.
39	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.
40	The nation-to-nation approach disenfranchises non-federally recognized tribes and urban Indians
41	Funding for digital archiving of languages is needed
42	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

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43	Not acknowledging a comment is a significant sign of disrespect
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