



June 19, 2023

To: National Science Foundation
Attn: Suzanne H. Plimpton, Reports Clearance Officer
2415 Eisenhower Avenue, Suite E7400
Alexandria, Virginia 22314
Sent via email to: splimpto@nsf.gov

Re: NSF PAPPG proposed changes comment request (88 FR 22488; document number 2023-07780)

Ms. Plimpton,

This letter is being submitted on behalf of Kawerak, Association of Village Council Presidents, the Aleut Community of St. Paul Island, and the Bering Sea Elders Group. The Tribal entities submitting this letter represent 77 federally-recognized Tribes. We are writing to provide comments on a number of the proposed changes to the National Science Foundation's (NSF's) Proposal and Award Policies and Procedures Guide (PAPPG). Thank you for providing an extension through June 19, 2023 for submittal of our comments.

We support NSF's recognition of underrepresented and underserved communities in STEM fields, as well as the attention to environmental justice as relates to minority and low-income populations, in the proposed changes. We also applaud the increased attention NSF will place through these PAPPG changes on the impacts of research on Tribal Nations, and the importance of researchers working collaboratively with Tribes and obtaining Tribal permission for research which has impacts on Tribes.

With regard to proposal-related requirements pertaining to Tribes as outlined in **Chapter 2 Section E(10)**, we encourage a broad interpretation of activities which require review and approval by Tribal Nations. Acknowledging that the bulleted list in this section is meant only as examples, we also stress the need for the requirement for Tribal review and approval to extend to research activities being proposed on or within traditional Tribal lands or waters, as well as research that has impacts on resources which, if impacted, Tribes would perceive as having had impacts on the Tribe itself. What may or may not have an impact is a culturally-defined question, understandings of which may vary significantly between Tribes and non-Tribal researchers (see e.g. Bielawski 1992, 1996, Fienup-Riordan 1999, Raymond-Yakoubian and Raymond-Yakoubian 2017, Kawerak 2021). What may or may not have an impact on Tribes is a question for Tribes to answer. In addition to assisting in properly addressing the potential impacts of research on Tribes, this would also assist in the implementation aspect of the proposed Tribal review and approval policy (the implementation aspect is, in general, lacking in detail as the proposed revisions currently stand). NSF recognizing a broad and

Tribally-based interpretation of activities which require Tribal Nation review and approval would also likely encourage researchers to work collaboratively with Tribes, and to do so as early as possible in the research process.

While supportive of the important effort to consider the impacts to Tribes as pertains to research, we also encourage all research institutions—including NSF—to conceive of the relationship between Tribes and research broadly, beyond just a focus on impacts: rather, we stress the need to focus on an *indigenization of research*, an understanding that Tribes are part of what research fundamentally is (Raymond-Yakoubian and Raymond-Yakoubian 2017, Kawerak 2021). Among other things, such a consideration broadens the suite of requisite epistemic and ethical considerations for research, such as greater movement towards co-production of knowledge. One small way this broader understanding could be realized in the PAPPG revisions would be to include some examples of activities which could be considered as a researcher’s “Synergistic Activities” (see Chapter 2 Section D(2)(h)(iv)) that are not traditionally western in nature, such as serving on a co-management body or expertly sharing Traditional Knowledge across generations and/or cultural groups.

It is our understanding that information about these revisions and the associated request for comments were sent to Tribal leaders. Having had a chance to review email correspondence that was sent to this effect, we encourage NSF to also include in such correspondence an invitation to Tribes to engage in formal Tribal Consultation on these and other issues. Providing comment is something anyone in the public can do; Tribes have special status, rights and relationships which must be recognized and affirmed in processes such as this.

The Tribal entities signing on to this letter also wrote to NSF in 2020 and 2021 with regard to significant concerns and problems associated with NSF research processes (Kawerak et al. 2020, 2021). We do not feel that there has been adequate progress or engagement with Tribal entities regarding those issues. We do see these proposed revisions to the PAPPG as a positive step towards improving the nexus related to Tribes and research. As such, we encourage continued work along such paths, including in a more substantial way and with greater involvement of Tribal entities.

You may direct any correspondence related to this letter to Dr. Julie Raymond-Yakoubian, Kawerak Social Science Program Director ((907) 443-4273; juliery@kawerak.org), who is serving as our collective point person for this letter.

Sincerely,



Melanie Bahnke
President
Kawerak, Inc.



Vivian Korthuis
Chief Executive Officer
Association of Village Council Presidents



Amos Philemonoff
President
Aleut Community of St. Paul Island



Jaylene Wheeler
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References

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Kawerak, Inc., Association of Village Council Presidents, Aleut Community of St. Paul Island, and Bering Sea Elders Group (2021) Letter to NSF regarding Executive Order 13985 and the Navigating the New Arctic Program. December 17, 2021. <https://kawerak.org/download/dec-2021-nna-follow-up-letter/>

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