



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

12 June 2023

The Wildlife Society
425 Barlow Place, Suite 200
Bethesda, MD 20008

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Ave, Suite E7400
Alexandria, VA 22314

RE: NSF Proposal and Award Policies and Procedures Guide [FR Doc. 2023-07780]

Dear Ms. Plimpton,

The Wildlife Society would like to thank you for the opportunity to provide input on the National Science Foundation's revisions to its Proposal and Award Policies and Procedures Guide (PAPPG), specifically, those changes which may impact Tribal interests in NSF funding opportunities. Our organization is pleased to submit these comments with the support of The Wildlife Society's Native Peoples' Wildlife Management Working Group.

Founded in 1937, The Wildlife Society (TWS; wildlife.org) and our network of affiliated chapters and sections represent over 15,000 wildlife biologists, scientists, and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitat through science-based management and conservation.

Members of The Wildlife Society's Native Peoples' Wildlife Management Working Group serve TWS as subject matter experts on issues and topics impacting Native American and First Nations wildlife management. Both the Working Group and TWS promote improved relationships between state, provincial, and federal wildlife managers and tribal wildlife managers through improved communications, increased understanding, and training for students. The working group provides a forum for tribal and agency wildlife professionals to discuss wildlife management on reservation, aboriginal, and adjacent lands, and to share viewpoints on proposed policies affecting wildlife management on those lands.

The Wildlife Society is supportive of the NSF's intent to better account for impacts on tribal communities and citizens in its PAPPG. Last year, TWS provided [comments](#) to the Administration in support of greater inclusion of Indigenous Knowledge in federal policy, an effort that is well-aligned with support for tribal engagement in the NSF funding process. We offer the following considerations relating to the implementation of the revised PAPPG:

- We recommend that the NSF consider how processes outlined in the PAPPG will interact with the resources currently available to tribes for engaging with and reviewing research proposals

and funding opportunities. These procedures could create an additional burden on tribes which may have no dedicated institution for engaging with these processes.

- Tribes engaging with the NSF funding process should be provided with a clear avenue for communicating concerns about proposals with identified impacts on tribes, and we recommend continued engagement with tribal nations throughout the implementation of revisions to the PAPPG.

In response to the agency's solicitation of public input on revisions to the PAPPG, please see specific responses to the revisions highlighted in the "for comment" draft of the PAPPG (NSF 24-1) below:

Chapter 1 E(c), page I-6, replacing the term "Tribal Government" with "Tribal Nation"

The NSF currently acknowledges that there are tribes recognized by states but unrecognized by the federal government. We urge the NSF to engage with those communities during research and education initiatives.

NSF proposal eligibility criteria should make the distinction between tribal researchers and tribes conducting research, thus allowing for non-Native researchers to appropriately engage with tribes **after tribes have agreed to the association** with said research on a free, prior, and informed consent basis. The NSF should also recognize that individual tribal citizens should be able to provide proof of tribal citizenship if their claim of citizenship is being incorporated into their request for NSF funding. Tribes should be provided with a clear process to engage with the NSF if an individual's claims to tribal citizenship are shown to be false. It should be clearly established that tribes carry the final determination of individual citizenship and descendency, and the NSF should incorporate a commitment to revoke award funding within the current grant period in cases where claims of tribal citizenship are shown to be false.

Chapter 2 D(2)(i)(iv), page II-34, Special Information and Supplementary Documentation

This section of the PAPPG should include language identifying the NSF as the responsible party for the review, assessment, and assurance that awards approved for funding have followed the established guidelines, and either do not impact tribal resources or otherwise comply with Federal Environmental Statutes. This process may otherwise be overly burdensome to tribal communities, especially those without dedicated institutions and/or internal processes for research review.

Chapter 2 E(10), page II-43, Tribal Nation permissions

Section E(10)(d) currently states that "NSF funding for a proposal that includes an activity that requires prior approval from a Tribal Nation or Tribal Nations **will not be awarded** until the required documented approval from the relevant Tribal Nation(s) has been submitted to NSF." This condition may prove burdensome or challenging for tribes whose policies relating to research do not align with NSF funding timelines. We recommend NSF revise this condition to instead implement a period where funding is "tentatively awarded" based on assurances that the applicant secures the appropriate tribal permissions and follows any applicable tribal laws and policies governing research, data sovereignty and publication. If tribes do not currently have these laws/policies in place, the applicant should provide a letter of support from the appropriate tribal governing body (i.e. business or community council) within a defined period of time. Review of permissions during this "tentatively awarded" period should be the responsibility of the NSF, as this process is burdensome for tribal communities. This portion of the PAPPG

should also include a requirement that applicants describe any plans for data sharing and future publication agreements and have a formalized and jointly agreed upon agreement prior to the end of the award period. Recognizing the critical importance of data sovereignty in this context, we recommend the PAPPG reference and recommend adherence to the CARE Principles relating to protections for indigenous data sovereignty as described by [Carroll et. al \(2020\)](#).

The Wildlife Society thanks the NSF for the opportunity to provide comments on revisions to its PAPPG. Any questions on these comments can be directed to Caroline Murphy, government relations manager, and cmurphy@wildlife.org, or 301-968-1903.

Sincerely,

A handwritten signature in black ink that reads "Donald Yasuda". The signature is written in a cursive, flowing style.

Don Yasuda
Certified Wildlife Biologist®
President | The Wildlife Society