

**Summary of Comments Received in Response to Consultation
Regarding the Departmental Manual, Part 301: Major Program Issues and Decisions**

Proposing to Add

A Handbook supplement to 301 DM Chapter 7: Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research

Overview

In December 2023 the Department of the Interior (Department) issued a new chapter in its Departmental Manual (DM) entitled *Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research*, 301 DM 7. This Chapter establishes the Department's policies, responsibilities, and procedures to respect, and equitably promote the inclusion of Indigenous Knowledge in the Department's decision making, resource management, program implementation, policy development, scientific research, and other actions.

The Department also drafted a companion Handbook reviewing procedures for implementing the policies found in 301 DM 7, pursuant to *011 DM 5 - Handbooks that Supplement Departmental Manual Chapters*. In June 2023, a team of employees representing a number of Department's Bureaus and Offices met with Indigenous leaders, scholars, experts, and Knowledge Holders. Attendees discussed the importance of Indigenous Knowledge and the importance of elevating Indigenous Knowledge to be on equal footing with other scientific approaches and information in the Department's work. This Handbook takes into consideration the individual views and expertise presented at that meeting and reviews by subject matter experts.

As was done for preparation of the Departmental Chapter, 301 DM 7, in 2022, the Department sent letters to leaders of Tribes, Alaska Native Corporations, and the Native Hawaiian Community seeking input on the content of this draft handbook on November 6, 2024. The Office of Insular Affairs also sent letters to Indigenous leaders in U.S. Territories and Freely Associated States. These letters sought oral and written comments, with comments due by January 8, 2025.

Input on the following questions was specifically sought:

1. Does the draft Handbook describe appropriate methods for working with Tribal Nations and Indigenous communities on Indigenous Knowledge issues? (see draft Handbook section 4 (B), Engaging).
2. Does the draft Handbook describe appropriate methods for receiving Indigenous Knowledge from Tribal Nations and Indigenous communities? (see draft Handbook section 4 (D), Receiving Indigenous Knowledge).

3. Does the draft Handbook describe appropriate methods for applying Indigenous Knowledge to Departmental actions and scientific research? (see draft Handbook section 4(E), Applying Indigenous Knowledge).

Three virtual consultation sessions were held, online using Zoom:

- December 9, 2024—Focus: All Federally Recognized Tribes (174 registrations)
- December 10, 2024—Focus: The Native Hawaiian Community (45 registrations)
- December 13, 2024—Focus: Alaska Native Corporations (40 registrations)

One virtual listening session was held, online using Zoom:

- December 11, 2024—Focus: U.S. Territories (137 registrations)

Oral and written comments received during the consultation period, as well as the listening session with U.S. territories and Freely Associated States, were reviewed and the draft handbook revised as appropriate. This report summarizes virtual session comments and responses received in writing (10 comment letters were received), from both consultation and listening session participants. The table at the end of the report identifies Handbook revisions stemming from the consultation process.

Given the depth of familiarity and expertise with the topic, commenters did not necessarily organize their comments around the Department's questions and thus this report is not organized around the questions asked. Comments from the Territorial listening session are identified separately in this document in order to distinguish results from consultation requirements found under part 512 of the Departmental Manual. Recommendations stemming from these efforts are reviewed and revisions to the handbook stemming from comments are summarized.

Review of Comments Received – Consultation

Comments received during Consultation with Tribal Nations, the Native Hawaiian Community, and Alaska Native Corporations include:

1. *Does the draft Handbook describe appropriate methods for working with Tribal Nations and Indigenous communities on Indigenous Knowledge issues?*
 - The discussion on the overthrow of 1893 (pg 18-19), appears very superficial and over simplifies a complex political time in Hawaii without any reference of the Provisional Government, the Committee of Safety, diplomatic actions of the Queen, impacts of disease, or even the legal questions surrounding annexation itself, etc... The manual references prior DOI works (i.e. Boarding School Investigative Report) as the source of information. But, wondering if this section can be expanded or is it restricted to repeating what's previously been published?
 - Does the research process include community participatory action research methods? Do the topics, projects, or research questions ever get generated from the indigenous communities themselves or do they mostly originate from the DOIs needs/inquiries?

- Agencies should acknowledge the history of the department or agency they represent, and the Federal Government broadly, when working with Tribes and Indigenous Peoples. Recognizing past injustice, while upholding Tribal treaty and reserved rights, and respecting Tribal and Indigenous communities, cultures, and values will assist Agencies in developing collaborative processes that are more equitable and inclusive of Indigenous Peoples and their knowledge systems.
 - Instead of approaching IK through contexts of history and time, the Handbook must contextualize IK first and foremost through spatially oriented systems of perspective and relation. Broader examples representing various geographic, ecologic, and policy scenarios will better illustrate the integration of Indigenous Knowledge.
 - The Tribe points the DOI to a discussion of the basics of cultural humility at <https://inclusion.uoregon.edu/what-cultural-humility-basics>.
 - Engagement should begin with government-to-government consultation.
 - How do Alaska Native Corporations fit into the Handbook?
 - Food and refreshment, especially meetings that overlap the lunch hour, are a given. It is our duty to feed our guests, and if our guests refuse, that can be seen as an insult.
 - “Seek to build institutional relationships based on Bureau or Office roles, as opposed to individuals.” We understand that people’s roles are their roles, but that does not mean that we can’t also learn about them as people.
 - Unlike other communities, Native Hawaiians do not necessarily have elected or selected leaders. How does that impact the criteria selection for who is a "knowledge holder" for Native Hawaiians?
 - Ensure that the topic of engaging, forcibly removed tribes in their homelands is a topic of conversation in the DOI.
 - For Hawaii in particular with a limited federal land base, how to help support projects or advocate for projects that are trying to incorporate indigenous knowledge and research management and land use even if it's not on lands holding with DOI jurisdiction?
2. *Does the draft Handbook describe appropriate methods for receiving Indigenous Knowledge from Tribal Nations and Indigenous communities?*
- Can a section be added or considered to ensure that the analysis and dissemination of large scale projects contextualize the findings to the various communities?
 - Document privileges mainstream western notions of time and timeframes and worldviews. The handbook does not discuss deference to Indigenous Knowledge.
 - We are concerned these (compensation) rates may not always be fair, equitable, or culturally appropriate.

- Clarify and expressly state that ownership of materials, knowledge, documents, reports, publications, or other information collected from Tribes, remain with the Tribes. At no time shall ownership transfer.
- There may be limitations placed on Tribal staff on what they are allowed to engage in.
- It is important to also make sure that a review (checklist) addressing Highly Influential Scientific Assessment and Information Quality Act considerations be included.
- Include a section describing dealing with some type of emergency or natural disaster. This is where indigenous knowledge really needs to come in quickly.
- Will we receive notice that this information is going to be released and may impact your tribe. Already addressed in Handbook.
- The practice of using methods such as stakeholder or rights-holder analysis is problematic, as it skews the focus off of working with Tribes in favor of working with groups that might not consider Tribal input as carefully.
- The Tribe believes that the Department should Consult with Tribes to determine which avenue is appropriate: whether the Department should possess the shared Indigenous Knowledge or just the conclusions. This should not be a decision that the Department makes unilaterally.
- Time frames for comments should be considered on a project-by-project basis, but no fewer than 30 (thirty) days.
- Calling Indigenous Knowledge (IK), also known as Tribal Ecological Knowledge (TEK) with emphasis on the word “knowledge” discredits this body of knowing as part of evidence-based scientific practices by those trained under “Western Science”. IK or TEK is Indigenous Applied Science (IAS) and needs to be acknowledged and treated as such.
- The Department must ensure encourage fostering relationships with understanding and respect, and not necessarily about having the technical details that could be considered IAS.
- IAS oftentimes is not just place specific, but can also be time specific.
- If an employee’s initial timeline for including and applying Indigenous Knowledge is constrained, the employee should consider whether they can follow up with the Tribal Nation, Indigenous community, or Knowledge Holder after completion of the original action or research to conduct a more complete project.”
- The Handbook also fails to identify or provide any operational mechanisms of accountability for DOI staff and personnel who passively disregard or actively work to undermine the vital importance and applicability of IK for agency decision making.

- One difficulty not addressed is who and how evaluations are completed. Without clear guidelines and authority, some decisions may be arbitrarily influenced by individual judgment
- Additional detail tailored to specific cultural, historic, or geographic contexts is needed to avoid a one-size-fits-all approach.

3. Does the draft Handbook describe appropriate methods for applying Indigenous Knowledge to Departmental actions and scientific research?

- Does this policy portend that there might be something coming across all the government agencies within Hawaii in terms of how to treat indigenous knowledge?
- Alignment between federal legal obligations and ethical principles (Belmont Report, UNDRIP) is not clearly articulated.
- Will this initiative continue given the changes in federal leadership?
- The Handbook needs to be followed by actual appropriation and allocation of funds.
- The section on reconciling conflicts between knowledge system section warrants additional content and discussion.
- When Indigenous and western knowledge are in conflict there is usually one that is wrong, not always both valid and correct. They can be both valid and correct as noted in the manual but when there is a conflict it usually means someone or maybe both sides of that intellectual coin further exploration and understanding of what assumptions they're making that are leading to different conclusions.
- A government-to-government consultation is with each individual tribe. It's not on a big group like this.
- The Handbook ultimately leaves decision making to the arbitrary and biased whims of those who already hold Western priorities and values, work through and deem valid Western forms of knowledge production, and engage and live the world through the parameters of temporally oriented worldview systems.
- In decision making, will one knowledge system be prioritized over another?
- Are the recommended measures in the framework or mechanism of engagement geared towards the creation of Memorandums of Agreement/Understanding with Indigenous communities in proposed actions of the Department or other federal entities?
- The Tribe would prefer that the nine FOIA exemptions be specifically stated within the Handbook. The lack of a FOIA exemption, and requirements such as the OPEN Act, jeopardizes data sovereignty.

- We recommend that the Department engage in further government-to-government consultation on tribal intellectual property issues. Until we collaboratively address this greater issue, the Department should add language to the Handbook to create opportunities for the legal protection of Indigenous Knowledge.

Other Comments

- There are no measurable tools, self-assessments, or metrics for employees to evaluate or improve their competency.
- Without regular feedback the handbook may fail to adapt or evolve to address gaps, incorporate lessons, learned, or strengthen principles.
- How will the HB be integrated into the current DOI University course “Consulting with Tribal Nations”? That course is a 101 level, and the HB is advanced 500 level content.
- Requests that the trainings are also open to Tribal comment and consultation, prior to the trainings going live. This will allow the Tribes opportunities to contribute and comment on the effectiveness and culturally appropriateness of the trainings. The Tribe requests that trainings be developed in coordination with Tribes.

Review of Comments received – Listening Session

Comments received during Consultation with U.S. Territories and Freely Associated States include:

1. Does the draft Handbook describe appropriate methods for working with Tribal Nations and Indigenous communities on Indigenous Knowledge issues?

- Existing Handbook language about bringing federal employees ‘into contact with’ Indigenous people is inappropriate. Instead, you could consider text that may involve collaboration with indigenous peoples.
- The Handbook needs to recognize the dynamic natures of indigenous cultures and incorporate the culture evolution of indigenous cultures into this document.
- Ensure the Handbook discusses that there are protocols within each culture with regards to the sharing of traditional knowledge.
- Imagery and illustrations for the Pacific Islands are lacking in the Handbook.
- The description of reciprocity is overly transactional.
- Can it be stated in the Handbook that whether or not we are federally recognized, the Department works with Indigenous peoples?

- While there is recognition of the historical context from land disposition, the Handbook does not include the Treaty of Paris and how many of us here found ourselves in this political conundrum.
 - The phrase “language limitations” could suggest that Indigenous languages are deficient in some way.
 - There is a lack of information on the governing structures for the unincorporated Territories, despite the suggestion for Department of Interior employees to understand the governing structures for Indigenous communities.
2. *Does the draft Handbook describe appropriate methods for receiving Indigenous Knowledge from Tribal Nations and Indigenous communities?*
- There may be unintended or inadvertent consequence to giving the wrong person recognition as a knowledge holder.
 - If political and economic variables are not included, does any application also miss the economic benefits to the community? Or the political recognition?
3. *Does the draft Handbook describe appropriate methods for applying Indigenous Knowledge to Departmental actions and scientific research?*
- What are suggestions/ best practices for working with Tribal Nations and Indigenous communities to rectify a situation where the disclosure of Indigenous knowledge causes harm or exploits the community?
 - Will the accumulation of knowledge in the history of a Tribal Nation/Indigenous community be utilized by the Department in an existing archive or depository?
4. *Other Comments*
- Could there be opportunities for Indigenous people to engage in traditional activities that are currently prohibited, such as harvest of species not currently allowed?
 - Is there a way that the Department of Interior can empower indigenous groups in their territories that are not listed in NAGPRA or as tribal nations to give them power to consult and try to bring these back?

General Recommendations applicable to the Handbook and other Departmental Processes

Several comments highlighted the opportunity for procedural improvement in Department communications and consultations. Where appropriate, these facets of these comments are also identified in following sections summarizing revisions to the Handbook based on comments received.

- Not all the virtual session participants were familiar with how to access the draft Handbook for review.
- Commenters indicated the combination of a virtual session and opportunity to submit written comments did not fulfill the requirement for government-to-government consultation. As stated in one comment letter:

Consultation is when two sovereigns come together to discuss how one's action will impact the other's sovereignty, and discuss ways to minimize impact on each other or to figure out ways to benefit both. The session on December 9 (2024) was more in lines of a Coordination where technical merits are shared such that it can inform the parties involved on if the topic needs to be raised to a level of Consultation.
- Commenters were concerned that decision-making authority with Department actions that affect Tribal interests, being retained by the Department, could undermine Tribal input.
- Not all engagements are Consultation. There are many forms of engagements that are considered Coordination. Both Consultation and coordination need to occur.
- Commenters encouraged the Department to both work with other relevant Federal agencies with decisions and actions, as well as to partner with other agencies where DOI capacity may be lacking. For example, the Office of Native Hawaiian Relations fills this roll in Hawaii, even though the Handbook applies to the Department of the Interior and its Bureaus and Offices.
- Communication regarding compensation for services should continue, and in communities with a community base for input rather than governance structure (e.g. Native Hawaiians) continue to build relationships which help facilitate identification of appropriate knowledge holders.
- The Department's training on Indigenous Knowledge was not a subject of direct consultation. While relevant revisions to the Handbook will be propagated into the training, a number of comments received are topics for which the training elaborates. Examples include: use of term preferred by the Tribal Nation or Indigenous community, additional detail regarding ethical considerations (e.g. Belmont or UNDRIP), relationship building practices, that there is not a single template to follow, and opportunities to evaluate competency.

Summary of Handbook Revisions

Attendees generally supported the content of the draft Handbook and found the discussion of Indigenous Knowledge implementation to be helpful. Several commenters commended the Department for its efforts to elevate Indigenous Knowledge with release of the Department Manual chapter and this Handbook. Specific comments focused on concerns, limitations, and potential improvements with and to the Handbook. Several virtual session attendees had questions about how the draft Handbook would be used in practice, which the drafting team answered during these sessions.

The Handbook was reviewed in light of the comments, and revisions were made in a number of sections with the majority of revisions affecting Section 4 (Elevating, Including, and Applying Indigenous Knowledge in Departmental Actions and Scientific Research). The following points *summarize* revisions to the handbook.

1. Several commenters pointed to areas where contextual, background, or historical Handbook content could be augmented to more clearly communicate issues, the unique nature of relations with Indigenous Peoples, or specific regional circumstances. The Handbook revisions took these into consideration. Revisions also considered counter-veiling comments regarding the need to keep the Handbook succinct and comments which urged the Department to not superficially address a wide range of topics, but instead urge staff to build relationships and understanding at a local level.

Relevant revisions emphasized:

- The Department/Bureaus/Offices should identify and coordinate with Tribal Nations or Indigenous communities that may have an interest in their action or research or on who's lands an action or research project may take place during the planning process. Tribal Nations or Indigenous communities may have been removed from their traditional homelands, but still have an interest in, and deep connection to those lands. Moreover, they may retain Tribal treaty and reserved rights within the landscape and have cultural connections even if they no longer reside there.
 - The Department/Bureaus/Offices should invite collaboration. This can occur through a variety of aspects in the context of the Handbook, from supporting Tribal Nations and Indigenous communities to store, manage, and protect their knowledge, to considerations of whether knowledge should be passed to the Department or if only conclusions from interpretation of relevant IK should be shared with the Department.
 - Recognize the ties to landscape and issues through language. Translation can be challenging. One goal with understanding language differences is to add context to information and findings, while avoiding over-generalization.
 - Corrections to figure in the Alexander Archipelago Wolf Species Status Assessment (case study) were made.
 - Attempt to understand background and history not only from a Western perspective, but also from an Indigenous lens.
 - Governance structures for Indigenous peoples differ widely, including those in the U.S. Territories and Freely Associated States.
2. Commenters stated the draft Handbook continued to privilege mainstream Western notions over Indigenous Knowledge.

Relevant revisions emphasized:

- It is important to note that 301 DM 7 and thus this Handbook applies to all Indigenous Peoples as defined in this Handbook.

- Knowledge systems are dynamic and evolve over time.
 - Handbook language addressing reciprocity was modified to emphasize collaboration rather than transactional activities.
3. Commenters highlighted that the discussion of reconciling conflicts between Western knowledge and Indigenous Knowledge needed additional information and explanation.

Relevant revisions emphasized:

- The Department/Bureaus/Offices should seek to build enduring institutional relationships and not rely solely on individual employees or Indigenous community members. Nevertheless, Department employees are individuals and rapport and relationships may be built on shared connections and not solely professional responsibilities.
 - In some cases, conclusions based in one, or both, knowledge system and associated approaches may be incorrect. In seeking to build consensus further exploration and understanding of the assumptions made that are leading to different conclusions may be necessary.
 - In cases where Indigenous Knowledge from multiple Tribal Nations or Indigenous communities is included, discuss the level of specificity each Tribal Nation or Indigenous community desires in the final product.
4. Commenters were concerned with the Department's ability to fully implement the suggested processes and practices in the draft Handbook, including reliance on Tribal and Indigenous community capacity. The following concerns should be considered when including Indigenous Knowledge in the Department's work:
- Tribal nation staff have finite resources (i.e. capacity constraints) and may also be limited in what they are allowed to engage on in their positions with the Tribe.
 - The Department/Bureaus/Offices should work with the Tribal Nation or Indigenous community to develop a plan for receiving and documenting Indigenous Knowledge that minimizes harm to the Nation or community should Indigenous Knowledge be disclosed to the public. There is not a single approach (such as establishing Memorandum) for such efforts.
 - Indigenous Knowledges can and should contribute to emergency response efforts (including when the phrase "other actions" is used in the Handbook). For example, in responding to emergencies or natural disasters it may be necessary to receive Indigenous Knowledge quickly in order to inform response actions and protect culturally significant areas. The amount of time one has for in-depth engagement on Indigenous Knowledge issues is reduced.

The following table identifies Handbook revisions stemming from this consultation process.

Handbook to 301 DM 7 – Original Language	Handbook to 301 DM 7 – Updated Language	Explanation of Changes
Forward (p. iii) and Section 1: How to use this Handbook - Intended Audience		
This Handbook is intended for Department employees who have a role in decision making, resource management, program implementation, policy development, scientific research, and other actions that may bring them into contact with Tribal Nations or Indigenous communities to engage with Indigenous Knowledge.	This Handbook is intended for Department employees who have a role in decision making, resource management, program implementation, policy development, scientific research, and other actions that may bring them into contact involve collaboration with Tribal Nations or Indigenous communities to engage with Indigenous Knowledge.	Original phrasing could have unintended implications that could be seen as impersonal, transactional, or as though we are coming into “contact with” an alien.
Section 1: How to use this Handbook		
No corresponding initial text.	It is important to note that 301 DM 7 and thus this Handbook applies to all Indigenous Peoples as defined in this handbook	Clarification added to the Handbook that the policy and Handbook apply to all Indigenous Peoples.
Section 1: How to use this Handbook -Intended Audience		
This Handbook is intended for Department employees who have a role in decision making, resource management, program implementation, policy development, scientific research, and other actions.	This Handbook is intended for Department employees who have a role in decision making, resource management, program implementation, policy development, scientific research, and other actions (other actions may include emergency or disaster response) .	Identify emergency and disaster response in the actions of the Department where Indigenous Knowledge should be included.
Section 1: How to use this Handbook -Getting Started		
Indigenous Knowledge may be appropriately applied in a variety of Department actions, including ecosystem and community resilience work, climate change scenario planning, environmental compliance work, and various environmental studies.	Indigenous Knowledge may be appropriately applied in a variety of Department actions, including ecosystem and community resilience work, climate change scenario planning, environmental compliance work, and various environmental studies as well as emergency and disaster response .	Identify emergency and disaster response in the actions of the Department where Indigenous Knowledge should be included.

Section 2: Embracing Indigenous Knowledge - What is Indigenous Knowledge		
We are all situated within one or more knowledge systems that are culturally influenced and that shape the ways we perceive, interact with, and understand the world. Knowledge systems are the foundation of all societies.	We are all situated within one or more knowledge systems that are culturally influenced and that shape the ways we perceive, interact with, and understand the world. Knowledge systems are the foundation of all societies; they are dynamic and may evolve over time.	Acknowledge the dynamic nature of (Indigenous) culture.
Indigenous Knowledge is often specific to a landscape and encoded in language.	Indigenous Knowledge is often specific to a landscape and encoded in language. deeply tied to specific landscapes and expressed through language. Some concepts in Indigenous languages may not have direct equivalents in English, making translation complex and potentially leading to a loss of nuance. Recognizing the challenges of translation and the richness of all languages is essential to understanding and respecting Indigenous Knowledge.	Original language (specifically “encoded” may be hard for the reader to understand as well as serve to other Indigenous languages.
Section 4: Elevating, Including and Applying Indigenous Knowledge in Departmental Actions and Scientific Research --Planning		
In some cases, there may be statutory or regulatory timing limitations, or project timelines may be limited for other reasons. The employee should inform the Tribal Nation, Indigenous community, or Knowledge Holders of the timing limitations and determine with them the scope of the Indigenous Knowledge that could realistically be included in the action or research given the time limitations.	In some cases, there may be statutory or regulatory timing limitations, or project timelines may be limited for other reasons. For example, in responding to emergencies or natural disasters it may be necessary to receive Indigenous Knowledge quickly in order to inform response actions and protect culturally significant areas. If the amount of time one has for in-depth engagement on Indigenous Knowledge issues is reduced. In such cases, the employee should inform the Tribal Nation, Indigenous community, or Knowledge Holders of the timing limitations and determine with them the scope of the Indigenous Knowledge that could realistically be included in the action or research given the time limitations.	Identify emergency and disaster response in the actions of the Department where Indigenous Knowledge should be included.

<p>The Department’s Indigenous Knowledge Policy encourages ongoing relationships with Tribal Nations and Indigenous communities regarding Indigenous Knowledge.</p>	<p>An employee should identify Tribal Nations or Indigenous communities that may have an interest in their action or research or on who’s lands an action or research project may take place during the planning process. Keep in mind that Tribal Nations or Indigenous communities may have been removed from their traditional homelands, but still have an interest in, and deep connection to those lands. Moreover, they may retain Tribal treaty and reserved rights within the landscape and have cultural connections even if they no longer reside there. The Department’s Indigenous Knowledge Policy encourages ongoing relationships with Tribal Nations and Indigenous communities regarding Indigenous Knowledge.</p>	<p>Ensure that Tribes removed from their homelands are engaged to work with the Department on actions that impact their homelands.</p>
<p>Section 4: Elevating, Including, and Applying Indigenous Knowledge in Departmental Actions and Scientific Research – Engaging: Assessing Capacity to Engage</p>		
<p>The capacity to share Indigenous Knowledge may differ depending on the scope and scale of the action or research. Tribal Nations and Indigenous communities may lack staff, leadership, or Knowledge Holders to work with the Department. In such cases, the employee should seek to support the capacity of Tribal Nations and Indigenous communities to engage in actions and research where possible through, for example, cooperative agreements, technical assistance, grants, or other means, as appropriate. Tribal Nations and Indigenous communities should identify their own capacity and need for capacity building.</p>	<p>The capacity to share Indigenous Knowledge may differ depending on the scope and scale of the action or research. Tribal Nations and Indigenous communities may lack staff, leadership, or Knowledge Holders to work with the Department. In addition to capacity constraints, Tribal staff may be limited in what they are allowed to engage on in their positions with the Tribe. In such cases, the employee should seek to support the capacity of Tribal Nations and Indigenous communities to engage in actions and research where possible through, for example, cooperative agreements, technical assistance, grants, or other means, as appropriate. Tribal Nations and Indigenous communities should identify their own capacity and need for capacity building.</p>	<p>The Department must be aware that there may be limitations placed on Tribal staff on what they are allowed to engage in, and assess what would be considered for merit in Consultation for that particular Tribal Nation or Indigenous Community.</p>
<p>Tribal or Indigenous history: What is the history of this Tribal Nation or Indigenous</p>	<p>Tribal or Indigenous history: What is the history of this Tribal Nation or Indigenous community?</p>	<p>This phrase (“an Indigenous lens in addition to a Western lens”) has been</p>

<p>community? Were they relocated or do they reside on their ancestral homelands? Each Tribal Nation and Indigenous community is unique, and each has a unique relationship with the Federal Government and the Department. It is the employee’s responsibility to learn this history and how it will impact their engagement and subsequent work with the Tribal Nation or Indigenous community. Attempt to learn this history through an Indigenous lens in addition to a Western lens.</p>	<p>Were they relocated or do they reside on their ancestral homelands? Each Tribal Nation and Indigenous community is unique, and each has a unique relationship with the Federal Government and the Department. It is the employee’s responsibility to learn this history and how it will impact their engagement and subsequent work with the Tribal Nation or Indigenous community. Attempt to learn this history through an Indigenous lens in addition to not only a Western lens.</p>	<p>edited to clarify the guidance is intended to direct the reader to seek out histories written by the Indigenous group as opposed to solely relying on outsider accounts.</p>
<p>Political organization: Tribal Nations are sovereign and have their own political organization and governments, which may differ among Tribes. An employee should understand a Tribal Nation’s or Indigenous community’s governing structure before engaging to ensure that they work with the appropriate individuals to receive official consent.</p>	<p>Political organization: Tribal Nations are sovereign and have their own political organization and governments, which may differ among Tribes. Additionally, the U.S. Territories and Freely Associated States have their own governing structure. An employee should understand a Tribal Nation’s or Indigenous community’s governing structure before engaging to ensure that they work with the appropriate individuals to receive official consent.</p>	<p>A sentence has been added to make it clear that research must be conducted to understand governance structures in the territories and freely associated states not just sovereign Tribal Nations</p>
<p>Section 4: Elevating, Including, and Applying Indigenous Knowledge in Departmental Actions and Scientific Research – Engaging: Relationship Building—Outreach and Coordination on Indigenous Knowledge</p>		
<p>Recognize that a relationship between a Tribal Nation or Indigenous community and the Department is a serious commitment. If an employee is seeking Indigenous Knowledge to meet an immediate need or does not have the capacity in their Bureau or Office to develop a long-term relationship, the employee should be transparent and communicate this to the Tribal Nation or Indigenous community. The employee should not commit to a relationship if they are unsure of Bureau or Office capacity and ability to follow through on the commitment. The employee</p>	<p>Recognize that a relationship between a Tribal Nation or Indigenous community and the Department is a serious commitment. If an employee is seeking Indigenous Knowledge to meet an immediate need or does not have the capacity in their Bureau or Office to develop a long-term relationship, the employee should be transparent and communicate this to the Tribal Nation or Indigenous community. The employee should not commit to a relationship if they are unsure of Bureau or Office capacity and ability to follow through on the commitment. The employee Bureaus and Offices</p>	<p>Edited to put the onus of an institutional relationship on the bureau or office as opposed to individuals as employees should feel free to have personal relationships.</p>

<p>should seek to build enduring institutional relationships between the Department and the Tribal or Indigenous community that does not rely exclusively on individual relationships between the employee and Tribal Nation or Indigenous community members or staff. Institutional relationships will be more successful in the long term as people move on and staff changes.</p>	<p>should seek to build enduring institutional relationships between the Department and the Tribal or Indigenous community that does not rely exclusively on individual relationships between an the employee and Tribal Nation or Indigenous community members or staff. Institutional relationships will be more successful in the long term as people move on and staff changes.</p>	
<p>Relationships between Tribal Nations, Indigenous communities, and the Department are based on unequal power relations. As such, developing relationships takes time and attention to power dynamics. Strive for reciprocal rather than transactional relationships that provide shared benefits to the Department and the Tribal Nation or Indigenous community. Be transparent about the Department’s ability to share authority when working collaboratively. Decisions about what and how Indigenous Knowledge is shared to inform an action or research can only be made by the Tribal Nation, Indigenous community leadership, and Knowledge Holder(s). Decision-making authority regarding scientific outcomes or decisions on Departmental actions must be made by the Department.</p>	<p>Relationships between Tribal Nations, Indigenous communities, and the Department are based on unequal power relations. As such, developing relationships takes time and attention to power dynamics. Although Department employees are building relationships on behalf of their Bureau or Office, they should introduce themselves as individuals, who they are, where they come from, and what motivates them, not just professional titles, and roles. Rapport, and thus relationships may be built on shared connections to land and familial roles of parent, child, or sibling, experiences that can transcend culture and build shared understanding (see Appendix 10 for additional resources on building relationships). Strive for reciprocal rather than transactional relationships that provide shared benefits to the Department and the Tribal Nation or Indigenous community. Be transparent about the Department’s ability to share authority when working collaboratively. Decisions about what and how Indigenous Knowledge is shared to inform an action or research can only be made by the Tribal Nation, Indigenous community leadership, and Knowledge Holder(s). Decision-making authority regarding scientific outcomes or decisions on Departmental actions must be made by the Department.</p>	<p>Two sentences were added to emphasize the relationship building relies on making personal connections.</p>

Section 4: Elevating, Including and Applying Indigenous Knowledge in Departmental Actions and Scientific Research -Applying Indigenous Knowledge --Planning		
Indigenous Knowledge may be appropriately applied in a variety of Department actions, including ecosystem and community resilience work, climate change scenario planning, environmental compliance work, and various environmental studies.	Indigenous Knowledge may be appropriately applied in a variety of Department actions, including ecosystem and community resilience work, climate change scenario planning, environmental compliance work, and various environmental studies as well as emergency and disaster response.	Identify emergency and disaster response in the actions of the Department where Indigenous Knowledge should be included.
Section 4: Elevating, Including and Applying Indigenous Knowledge in Departmental Actions and Scientific Research – Reconciling Conflict Between Knowledge Systems		
Divergent perspectives between knowledge systems can be valid and true at the same time.	Divergent perspectives between knowledge systems can be valid and true at the same time, however they are not always. In some cases, conclusions based in one, or both, knowledge system and associated approaches may be incorrect. In seeking to build consensus further exploration and understanding of the assumptions made that are leading to different conclusions may be necessary.	In some cases when there is disagreement between Indigenous Knowledge and Western Science one of them may in fact be incorrect and it is necessary to examine underlying assumptions that led to divergent conclusions.
Section 4: Elevating, Including and Applying Indigenous Knowledge in Departmental Actions and Scientific Research – Applying Indigenous Knowledge		
As appropriate, and only with free, prior, and informed consent, an employee should document the application of Indigenous Knowledge in their decision or research findings. The employee should first consider and consult with the Tribal Nation or Indigenous community about the level of detail and relevant Indigenous Knowledge necessary to document the final decision or research finding. Documentation should recognize the origin of the Indigenous Knowledge and give credit to the ideas, insights, and other forms of Indigenous Knowledge in ways requested by the	As appropriate, and only with free, prior, and informed consent, an employee should document the application of Indigenous Knowledge in their decision or research findings. The employee should first consider and consult with the Tribal Nation or Indigenous community about the level of detail and relevant Indigenous Knowledge necessary to document the final decision or research finding. In cases where Indigenous Knowledge from multiple Tribal Nations or Indigenous communities is included, discuss the level of specificity each Tribal Nation or Indigenous community desires in the final product. Documentation should recognize the origin	Address concerns about overgeneralization of Indigenous Knowledge when several Indigenous communities are described in a product (the commenter referenced the Boarding Schools Report) and expressed a desire to have specific community results contextualized.

<p>Tribal Nation, Indigenous community, or Knowledge Holder.</p>	<p>of the Indigenous Knowledge and give credit to the ideas, insights, and other forms of Indigenous Knowledge in ways requested by the Tribal Nation, Indigenous community, or Knowledge Holder.</p>	
<p>Section 4: Elevating, Including, and Applying Indigenous Knowledge in Departmental Actions and Scientific Research – <i>Protecting Indigenous Knowledge and Disseminating Results</i></p>		
<p>These and other disclosure statutes require that an employee carefully consider how to receive and document Indigenous Knowledge. Reach out to the Solicitor’s Office for advice on other statutory protections that may apply to the specific situation. Receipt and documentation procedures should protect sensitive information to the greatest extent possible.</p>	<p>These and other disclosure statutes require that an employee carefully consider how to receive and document Indigenous Knowledge. Department employees should work with the Tribal Nation or Indigenous community to develop a plan for receiving and documenting Indigenous Knowledge that minimizes harm to the Nation or community should Indigenous Knowledge be disclosed to the public. Reach out to the Solicitor’s Office for advice on other statutory protections that may apply to the specific situation. Receipt and documentation procedures should protect sensitive information to the greatest extent possible.</p>	<p>In response to the question: “If Indigenous Knowledge must be disclosed and doing so may harm or exploit Tribal Nations and/or Indigenous Communities, how may DOI ensure the least amount of harm is caused?” the following sentence has been added.</p>
<p>Consider supporting the Tribal Nation and Indigenous community in building their capacity to store, manage, and protect their Indigenous Knowledge. Consider whether the action or research requires that the Department possess the shared Indigenous Knowledge or just the conclusions from the interpretation of relevant Indigenous Knowledge.</p>	<p>Consider supporting the Tribal Nation and Indigenous community in building their capacity to store, manage, and protect their Indigenous Knowledge. In collaboration with the Tribal Nation or Indigenous community consider whether the action or research requires that the Department possess the shared Indigenous Knowledge or just the conclusions from the interpretation of relevant Indigenous Knowledge.</p>	<p>In response to a comment regarding the following sentence in the Handbook, <i>Consider whether the action or research requires that the Department possess the shared Indigenous Knowledge or just the conclusions from the interpretation of relevant Indigenous Knowledge</i>: “The Tribe believes that the Department should Consult with Tribes to determine which avenue is appropriate. Whether the Department should possess the shared Indigenous Knowledge or just the conclusions,</p>

		this should not be a decision that the Department’s make unilaterally.”
Appendix 10: Additional Resources		
No corresponding initial text.	Two new resources have been added: <ol style="list-style-type: none"> 1. What is Cultural Humility? The Basics Division of Equity and Inclusion 2. https://www.bia.gov/sites/default/files/medi_a_document/sacred_sites_guide_508_2023-1205.pdf 	Resources recommended in submitted comments.
Glossary: Elevating Indigenous Knowledge		
Elevating Indigenous Knowledge: This phrase means raising Indigenous Knowledge up to be on equal footing with other scientific approaches and information in Department actions, including scientific research and decision-making.	Elevating Indigenous Knowledge: This phrase means promoting raising Indigenous Knowledge up to be on equal footing with other scientific approaches and information in Department actions, including scientific research and decision-making.	The Handbook privileges Western Science in its reference to “elevating” Indigenous Knowledge. Promoting is consistent with the policy, “It is the Department’s policy to respect and promote the inclusion of IK...”
Other		
An Indigenous Leader from Guam provided input that they did not see themselves in the imagery in the Handbook. We have received art and use permission from a Pacific Islander artist and one of their pieces will be included.		