TRIBAL CONSULTATION REPORT AND RESPONSE

Native American Research Centers for Health (NARCH) Program Evaluation

National Institute of General Medical Sciences
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Executive Summary:

In CY2020, the National Institute of General Medical Sciences (NIGMS) initiated a formal evaluation of the Native American Research Centers for Health (NARCH) program to ensure that it continues to optimally meet the health research, education, and training needs identified and prioritized by American Indian/Alaskan Native (AI/AN) communities. As part of this evaluation, NIGMS initiated and held a formal Tribal Consultation to solicit input and feedback from Tribal Leaders, Tribal Nations, and Tribal Organizations on matters related to the evaluation. Specific feedback received from this consultative process included the following: 1) ensuring that both research projects and research infrastructure supported under NARCH are primarily conducted by Tribal Nations and communities rather than traditional academic institutions or partners; 2) removing application barriers to NARCH by simplifying submission requirements, particularly for Tribal Organizations that do not currently hold NIH grants; 3) ensuring that NARCH peer reviewers fully understand the importance of both culture and language as research elements for examining health disparities, resilience, and for dealing with trauma in Indian Country; 4) supporting AI/AN trainees at earlier points in the education and training pathway (e.g., starting in high school) and providing greater support to AI/AN institutions of higher education (e.g., Tribal Colleges and Universities); 5) providing stable Administrative Core funding and increasing overall program funding to further support both new and existing grantees; 6) ensuring the continuity (versus skipped-year cycle) of NARCH funding opportunity announcements; 7) creating opportunities for new applicants to the NARCH program to learn from existing grantees through collaboration and mentorship; and 8) conducting regular Tribal Consultations, including those related to future evaluations and programmatic changes. This document outlines and describes NIGMS' response to the above-described feedback received through Tribal Consultation. The Institute intends to continue its support for the NARCH program at or above current levels.

Background:

NARCH Program History and Goals

The National Institute of General Medical Sciences (NIGMS) within the National Institutes of Health (NIH), in conjunction with multiple other NIH Institutes, Centers, and Offices (ICOs), administers and supports the Native American Research Centers for Health (NARCH) program. The program, established in 2001, provides research and career enrichment opportunities to meet the specific health needs identified and prioritized by American Indian/Alaska Native (AI/AN) Tribes and Tribally based organizations.

Among the current objectives of the NARCH program are to:

- Work toward reducing health disparities in AI/AN communities by allowing these communities to control and prioritize health related research and career enhancement projects and opportunities that are specific to their unique community needs;

- Encourage the growth of research capacity and infrastructure within AI/AN communities by providing such communities with the framework necessary for research sustainability; and

- Enhance health related research partnerships while simultaneously supporting scientists and research professionals interested in AI/AN health research from within and outside of the AI/AN communities.

NARCH awards are made in alignment with the above objectives to support:

- Research directly linked to health concerns specifically identified, selected, and prioritized by Tribal communities; and

- Training resources to support productive careers in biomedical research related to AI/AN community health needs.

In FY 2018, NARCH awards totaled $10.1 million. Grant applications made to the NARCH program are submitted by (and awarded to) Tribes or Tribal organizations, supporting Tribal communities to establish and guide their own research priorities while also drawing upon any necessary added expertise from the research community.

The NARCH program's goals and structure have undergone several changes over the years. In 2014, for instance, the program explicitly added capacity building projects as a goal. Similarly, in 2017, the program removed the requirement for Tribes to partner with a research-intensive academic organization in order to give AI/AN communities better control over their own designated research priorities.

NARCH Program Evaluation

In alignment with NIGMS' strategic priority of ensuring that each of its programs is meeting its intended objectives, the Institute began a formal evaluation of the NARCH program in CY2020. Because NIGMS intends to maintain its support for the NARCH program at or above current levels, the purpose of the

evaluation is to ensure that the program continues to optimally meet the ongoing health research, education and capacity building needs of Tribal Nations and communities.

To facilitate a robust evaluation of the NARCH program, NIGMS empaneled a working group of its National Advisory Council to analyze extensive program data curated by the NIGMS Division of Data Integration, Modeling, and Analytics (DIMA). The evaluation working group included members having a broad range of subject matter expertise in AI/AN-related research, capacity building, and research training, including those having formal Tribal affiliations. This working group formulated a series of impressions about whether the NARCH program was meeting its intended goals and objectives and whether any of these goals and objectives might need to be adjusted. The group also formulated a series of suggestions related to areas wherein the program might be potentially improved, optimized, or strengthened.

In accordance with the evaluation timeline depicted below, NIGMS presented the impressions and suggestions of the NARCH evaluation working group to members of the NIH Tribal Advisory Committee (NIH TAC) and subsequently held formal Tribal Consultation to engage Tribal Leaders and Nations on these impressions and suggestions as well as the specific feedback received from the NIH TAC. Thus, cumulative feedback from these sources (i.e., impressions of the working group, suggestions from the NIH TAC, and recommendations obtained through and from Tribal Consultation) was used as the basis for forming NIGMS' responses as described below.

NARCH Evaluation Timeline and Tribal Consultation Process

CY 2020	Evaluation of the NARCH program initiated; approach included the curation of comprehensive quantitative and qualitative outcomes data as well as the analysis of trends in NARCH applications and awards. Candidates identified for a representative evaluation working group of NIGMS' National Advisory Council; preparations begun for the Tribal Consultation process.
February 17, 2021	Dear Tribal Leader Letter (DTLL) sent to all federally recognized Tribes.
March 16, 2021	Orientation meeting for the NARCH evaluation working group to communicate goals of the evaluation and share NIGMS program analysis/data.
April 23, 2021	Full-day meeting of the NARCH evaluation working group to discuss program analysis/data and to develop draft impressions and suggestions.
May 18, 2021	Presentation of working group results and draft impressions/suggestions to the NIH Tribal Advisory Committee (NIH TAC). Feedback from the NIH TAC solicited and incorporated into draft impressions/suggestions.
June 14, 2021	Tribal Consultation; presentation of draft impressions/suggestions to Tribal Leaders.
August 16, 2021	Due date for written responses pursuant to the Tribal Consultation.
September 9, 2021	Draft evaluation information presented to members of NIGMS' National Advisory Council.[1]
September 24, 2021	Anticipated due date for NIGMS to post response to Tribal Consultation on the NARCH webpage and the NIGMS Evaluation Reports webpage (also accessible through the NIH Tribal Health Research Office's Tribal Consultation webpage).
October 24, 2021	Due date for Tribal Nations to provide written comments on NIGMS' posted response through the NIH Tribal Health Research Office (THRO).
February 3, 2022	Finalization of NARCH program evaluation report, incorporating feedback from Tribal Leaders.
February 2022	Final evaluation report posted on the NIGMS Evaluation Reports page.

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[1] https://www.nigms.nih.gov/about/council/Pages/advisorycouncilroster.aspx

NIGMS Response to Tribal Consultation:

NIGMS has comprehensively examined and analyzed feedback obtained through the processes and engagements described above. The Institute appreciates and acknowledges the points raised during the consultation process; supports the suggestions provided by the NARCH evaluation working group and NIH TAC, and the recommendations from Tribal Leaders; and is assessing specific ways to address these items in a practical and robust fashion. Thus, in addition to the suggested changes to the existing NARCH program as described below, NIGMS is considering additional actions to help bridge the gaps between the expressed needs of Tribal Nations and the types of support and resources that can be effectively achieved or provided through the current NARCH program.

Feedback Item 1: Ensure that both research projects and research infrastructure supported under NARCH are primarily conducted by Tribal Nations and communities rather than traditional academic institutions or partners.

There was a strong emphasis on the need to increase the autonomy of Tribes in conducting NARCH-supported research in much of the feedback that NIGMS received. Tribal Nations and organizations stated that despite the goal of the NARCH program being to build research capacity within Tribal communities, academic partners still received most of the program's benefits. They highlighted evaluation-related data demonstrating that, unlike the number of PhDs from other historically underrepresented racial and ethnic groups in the biomedical sciences, those from the AI/AN community did not increase during the years of the NARCH program's existence. Participants thus felt that there existed too much emphasis on working with external academic partner institutions with comparatively little benefit to Tribes.

NIGMS Response

Beginning with NARCH IX in 2017, NIGMS removed the requirement that a NARCH grantee partner with a research-intensive institution or organization. In addition, NIGMS plans to more equitably support research projects prioritized by AI/AN communities by creating opportunities for Tribes who have not yet applied to NARCH to build their own internal capacity to effectively compete for NARCH funding. NIGMS will revise the NARCH funding opportunity announcement (FOA) to place more emphasis on capacity building (including student development); to further deemphasize the expectation that Tribes will have external academic partners; and to make clear that projects in which Tribes and Tribal Organizations play a lead role in planning, executing and disseminating the research are a priority. The Institute will also work to ensure that Tribal members receive due recognition and career advancement opportunities that are generated by NARCH-supported projects.

In addition, the Institute is considering the creation of *planning grants* that would provide Tribes without existing awards the resources required to develop a full NARCH application. These grants would provide support for Tribes to define their own research questions and develop plans on how to answer them rather than using questions and methods proposed by academic partners. The grants might also be used to assess capacity building and training needs, and/or to identify necessary consultants or collaborators in preparation for submitting a full NARCH application.

Similarly, NIGMS is considering an *IRB grants program* to support the establishment or enhancement of Tribal Institutional Review Boards (IRBs). Establishing additional Tribal IRBs or enhancing the function of existing ones (e.g., through additional support for staff, systems, and training) could help reduce delays in the IRB approval process, diminish reliance on external IRBs, and give Tribes greater autonomy over their own research processes.

Feedback Item 2: Remove application barriers to NARCH by simplifying and reducing the complexity of submission requirements, particularly for Tribal Organizations that do not currently hold NIH grants.

Tribal Leaders responding to the consultation were also concerned that NIH funding is more likely to be awarded to prior NIH grantees and those with experience writing NIH grants, which runs counter to the goal of building research capacity within Tribes and Tribal Nations. They felt that the NIGMS needs to consider changes that will encourage and enable more Tribes to participate in the NARCH program, with an emphasis on first-time awardees. Tribes that have applied for and historically received NARCH funding comprise but a small fraction of the 574 federally recognized Tribes. In addition, while 75% of first-time applicants received funding, those who were not funded were unlikely to apply again. Barriers to submission or re-submission raised in Tribal Consultation and by the NIH TAC include the complexity of the NARCH application and the structure of the NARCH funding cycle (see Feedback Item 6).

NIGMS Response

As it rewrites the NARCH FOA, NIGMS will work to find ways in which the application and award administration requirements can be simplified, as suggested by Tribal Leaders. I addition, the Institute is assessing the possibility of new grant programs to both strengthen its support for internal capacity building within AI/AN communities and to enable more Tribes to participate in the NARCH program. In addition to the planning grants program described above, one option under consideration is a *Tribal Technical Assistance and Resource Center program*, which could provide technical and administrative support and expertise in applying for and administering NIH grants. These centers, which would be similar in concept to the Support for Research Enhancement Resource Centers (PAR-21-227), would provide training and consulting to help Tribes establish or enhance their own Sponsored Programs Offices and to develop capacity for the financial administration of NIH grants. Another potential program would provide grants directly to Tribes to help them build or enhance *Sponsored Programs Offices*, similar to the NIH Sponsored Programs Administration Development program (RFA-RM-19-004), and could support needs such as grants administration staff training, electronic grants management system purchases or upgrades, and pre- and post-award support services.

NIGMS acknowledges the associated concern raised by Tribes that having additional grant programs for new applicants could result in an unintended disproportionality wherein Tribes with current funding, established academic partners, and extensive grant-writing experience would continue to preferentially obtain a more lucrative set of grants. NIGMS would take this concern into account in the development of the proposed programs described above. These programs would be designed to enhance the abilities of Tribes to obtain NARCH (and other NIH) funding

and to address specific capacity building needs of the Tribes. They would not be intended to substitute for the NARCH program but would instead complement it. With these additions, the Institute hopes to provide a suite of support options to Tribal Nations and organizations, including those that have not had any previous NARCH support.

Feedback Item 3: Ensure that NARCH peer reviewers fully understand the importance of both culture and language as research elements for examining health disparities, resilience, and for dealing with trauma in Indian Country.

Tribal Leaders felt that the current NIH peer review process does not sufficiently consider the cultural realities and historical context of research with AI/AN communities and thus may unfairly penalize Tribal organizations without prior NIH grants experience and disadvantage research topics and methods that deviate from traditional academic expectations. Similar sentiments were voiced by the NIH TAC, which suggested that more should be done to ensure that reviewers recognize the importance of both culture and language as research elements for understanding and addressing health disparities, resilience, and trauma within AI/AN communities.

To address the above-described challenges, Tribal Leaders recommended that reviewers for the NARCH program follow the guidelines laid out in the publication, "*American Indian and Alaska Native Research in the Health Sciences: Critical Considerations for the Review of Research Applications*", which is a document commissioned by the NIH Tribal Health Research Office (THRO) to help NIH peer reviewers understand the complexities of AI/AN health research.[2] In addition, participants felt that the emphasis on "grantsmanship" was not sufficiently aligned with the goal or realities of building capacity within Tribes, and that capacity building should therefore become a stronger evaluative factor in the review of applications.

The sentiments above served to augment a series of initial impressions articulated by the NARCH evaluation working group, which suggested that study sections reviewing NARCH applications should include AI/AN researchers. The group additionally suggested that study sections could serve as an important venue for both training and capacity building, such as by inviting AI/AN researchers from Tribes that have not yet been funded by NARCH to serve on study sections to learn about the overall peer review process, akin to NIH's popular Early Career Reviewer program.

NIGMS Response

NIGMS plans to discuss these recommendations with its colleagues at the NIH Center for Scientific Review (CSR), the entity that serves as the central locus of peer review for NIH applications, including those made to the NARCH program. Together, the two organizations hope to identify ways in which the NARCH review process can better align with the goals of the program and the communities that the program serves, while still meeting all requirements of NIH peer review. NIH's Tribal Health Research Office will also be engaged in these discussions.

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[2] https://dpcpsi.nih.gov/sites/default/files/Critical_Considerations_for_Reviewing_AIAN_Research_508.pdf

Like the feedback described above, both the NIH TAC and NARCH evaluation working group emphasized the need to look at indicators other than 'traditional Western metrics' (such as publications) during evaluations as well as in the review process. Projects that are priorities for and within Tribes may not previously have been articulated as research priorities for NIH, but the importance of such projects to Tribes must ultimately be considered. Analysis from the NARCH evaluation highlighted that the process of research itself, rather than just the resulting publications, can be beneficial for the broader AI/AN community. Over 40% of NARCH projects, for instance, have involved the adaptation or development of interventions for AI/AN health disparities. Similarly, career enhancement activities have emphasized training in community-based participatory research methods that allow members of the AI/AN community to be equally involved members in the research development process. Including these types of non-traditional indicators can provide a better understanding of the real-life impact of projects funded through the NARCH program.

NIGMS Response

During this NARCH program evaluation, NIGMS expanded its standard evaluation process to incorporate not just traditional quantitative academic indicators but also a systematic qualitative analysis of NARCH grant applications, awards, and research project progress reports (RPPRs). This integrated approach allowed NIGMS to better understand the impact of funded research on health issues and disparities of importance to AI/AN communities as well as the challenges faced by grantees in the conduct of research, capacity building, and career enhancement activities. The approach also provided NIGMS more insight into the potential use of different types of indicators such as the development of interventions, use of community-based participatory research methods, information dissemination outside of traditional academic journal publications, career progression, and behavior change or modification resulting from funded research or other such activities. NIGMS is therefore considering how to be more inclusive of researchers in Tribes and communities who may not fit the traditional western academic model (i.e., publications, academic appointments, etc.) in the review of grant applications, in the recruitment of study section participants, and in evaluation of progress reports.

Feedback Item 4: Support the development of AI/AN trainees earlier in the training pathway and provide greater support to AI/AN institutions of higher learning.

A crucial part of NARCH's function is to build scientific expertise within Tribal Nations and to provide opportunities and support for AI/AN students to become researchers themselves rather than relying on external academic partners. Data stemming from the NARCH evaluation working group illustrated that unlike biomedical Ph.D.s awarded yearly to other under-represented racial and ethnic groups, which have increased over the past two decades, the number of AI/AN students receiving biomedical Ph.D.s has remained flat. The analysis also revealed that student and Faculty/Researcher Enhancement projects, as well as training-focused capacity-building projects, have mostly supported development at the undergraduate and faculty/researcher stages. Tribal Leaders, in addition to NIH TAC members and members of the NARCH evaluation working group, indicated that more needs to be done to assist and support AI/AN students in developing into biomedical researchers. They thus suggested expanding outreach programs to cover students throughout the Kindergarten to Grade 12 (K-12) educational stage, with a particular emphasis on high school students.

NIGMS Response

Many of the current goals of the NARCH program – building capacity, developing scientists and health research professionals that are committed to AI/AN research, and reducing the distrust of health research – rely upon building robust health research expertise within Tribal Nations. Given the comparative lack of growth in the number of AI/AN students receiving biomedical degrees from the undergraduate stage onward, the need to expand outreach to include earlier stages of the educational process is needed. While NARCH Student Career Enhancement projects can currently include high school students, NIGMS hopes to be able to expand the scope of these projects to include more K-12 students, as recommended. The Institute will assess the feasibility of modifying the NARCH FOA to allow this expansion. In addition, NIGMS already sponsors the [Science Education Partnership Awards (SEPA)](#), which serves the preK-12 community and several funded SEPA projects currently focus on AI/AN students. The Institute will consider ways to solicit more SEPA applications from Tribes and Tribal Organizations.

In addition to the above, NIGMS is considering creating new training grant programs that would support students selected by Tribes to obtain bachelor's and Ph.D. degrees. *Undergraduate training grants (T34s)*, for instance, could provide tuition remission and stipends for either a Bachelor of Arts (B.A.) or Bachelor of Science (B.S.) degree, including for students who start at 2-year Tribal colleges. These grants would also support and provide students with access to research experiences and mentoring. Similarly, *graduate training grants (T32s)* would provide the same support for Ph.D. students, along with associated career development support. Due to both the complexity of training grants and the number of federally recognized Tribes, NIGMS envisions that each training grant would likely support students from multiple Tribes. NIGMS is currently exploring how such programs could be configured to equitably support students from multiple Tribes.

Feedback Item 5: Provide stable Administrative Core funding and increase overall program funding to support new grantees alongside existing ones.

Capacity building was made an explicit goal of the NARCH program in 2014 under NARCH VIII, when it was included as a potential project type. During Tribal Consultation, Tribal Leaders expressed the need for stable Administrative Core funding to build research infrastructure and capacity and to maintain projects over time.

NIGMS Response

While capacity building projects were added as a project option and administrative cores made a required component of NARCH VIII in 2014, NIGMS understands that the complexity of the NARCH application can still be a barrier to potential applicants. Thus, as indicated in the response to Feedback Item 2, NIGMS is currently assessing the possibility of creating new grant programs to both strengthen its support for administrative and research capacity building within AI/AN communities and to encourage more Tribes to participate in the NARCH program. One option under consideration is a program to support a Tribal Technical Assistance and Resource Center, which could provide technical and administrative support and expertise in applying for and

financially administering NIH grants. Another potential program would provide grants to Tribes to help them develop or enhance Sponsored Programs Offices and support needs such as grants administration staff training, electronic grants management system purchases, and pre- and post-award support services. Finally, planning grants for Tribes without NARCH awards are also being considered to both increase the number of competitive NARCH applications and more fully support Tribally-driven, Tribally-conducted research. Such grants would provide resources to allow Tribes to develop their own applications by supporting items such as the consultations needed to develop NARCH applications, staff time, meetings, and/or travel.

NIGMS hopes to be able to increase funding for the NARCH program, contingent on appropriations and a sufficient number of meritorious applications. In addition, NIGMS will work with THRO to encourage other NIH institutes, centers and offices to maintain or expand their support for the NARCH program.

Feedback Item 6: Make funding announcements continuous rather than on the current skipped cycle.

Barriers to the submission or re-submission of NARCH applications raised during Tribal Consultation included not only the complexity of the application itself but also the current structure of the NARCH funding cycle. The cycle of NARCH FOAs, which includes a gap between application periods for paired four-year funding cycles (see Figure 1 below), was cited in Tribal Consultation as a factor that complicates the ability and desire of Tribal Nations to apply or re-apply to NARCH. This structure may also make it more difficult to maintain stable funding. Tribal Leaders recommended that NIH should receive NARCH applications on a yearly cycle instead.
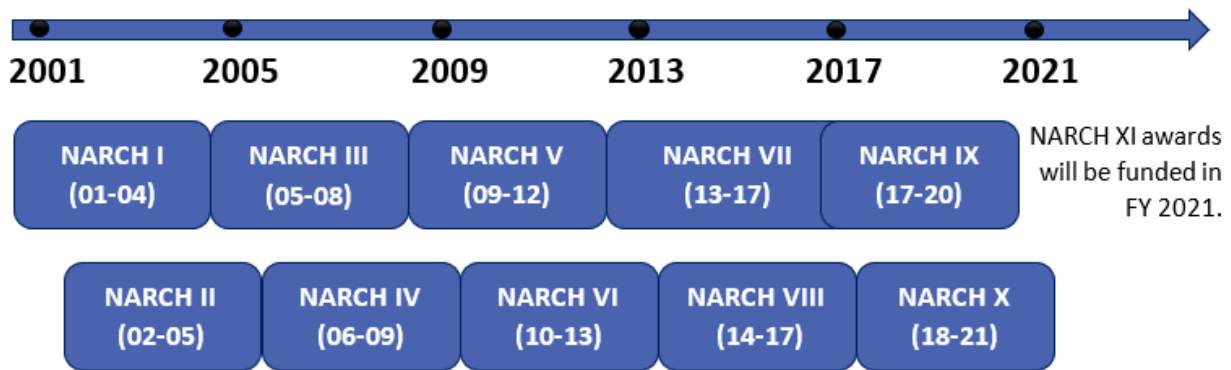

Figure 1. NARCH funding cycles have historically been structured in pairs of overlapping four-year cycles.

NIGMS Response

NIGMS appreciates that the complexities of the NARCH application and funding cycles represent barriers for potential applicants. Historically, NARCH FOAs were not issued every year due to the interagency nature of the program (i.e., administered in conjunction with the Indian Health Service) and the intricacies associated with both the scientific review and funding processes.

NIGMS plans to release future FOAs with a receipt date every year, as recommended by Tribal Leaders.

Feedback Item 7: Create opportunities for new applicants to learn from existing grantees through mentorship or collaboration on proposals.

NIGMS Response

As indicated above, NIGMS is considering multiple ways to be more inclusive of Tribal communities that do not currently have strong research infrastructures, including creating potential new opportunities in the recruitment of study section participants (response to Feedback Item 3), the provision of additional training and career development opportunities throughout the educational pathway (response to Feedback Item 4), and in further supporting research capacity building within Tribes (response to Feedback Items 1 and 2). In particular, the proposed NARCH planning grants will support Tribes in setting up collaborations and seeking advice and mentorship for developing their own research projects and infrastructure. The goal of expanding the membership of NARCH study sections to include Tribal community members who have not previously been involved in NARCH projects could further catalyze these important collaborative and mentoring relationships.

Feedback Item 8: Conduct regular Tribal Consultations, including those related to future evaluations and programmatic changes.

Tribal Leaders commended NIGMS for evaluating the NARCH program and for soliciting meaningful input from Tribal Nations about the evaluative process through formal Tribal Consultation. They suggested that NIH conduct additional Tribal Consultations to help ensure that evaluations of (or changes to) programs such as NARCH meet the specific needs of Tribal Nations. They also requested a Tribal Consultation prior to any future evaluations of the NARCH program.

NIGMS Response

Engaging Tribal Leaders and Nations as well as incorporating their input and feedback is vital to ensuring that programs such as NARCH meet the specific needs identified and prioritized by Tribal communities, including capacity building, support for the professional development of AI/AN researchers, and advancing health equity within and among AI/AN communities. NIGMS has found the Tribal Consultation process to be extremely helpful in allowing the Institute to understand specific Tribal concerns and needs. NIGMS will continue engaging with Tribal Nations and AI/AN researchers through this process in the future.

Closing:

NIGMS appreciates the opportunity to participate in the Tribal Consultation process and has found the feedback received from it to be extremely informative. The Institute is grateful to Tribal Nations and Leaders for their insights and looks forward to continuing these dialogues in the future.