



Dear Researcher,

Thank you for your interest in applying for a research permit with the Tohono O'odham Nation's (TON) Institutional Review Board (IRB). We, The Tohono O'odham Nation's IRB are responsible for ALL research within the geographical boundaries of any of the Nation's reservations. Members of the board are Tohono O'odham citizens who have been nominated by the TON Executive Branch and elected by the Nation's Legislative Council tasked to ensure the health and safety of tribal members, living and non-living materials, animate and inanimate entities located on the Tohono O'odham Nation as outlined in the [Tohono O'odham Nation's Research Code](#). As a board, we are committed to ensuring that all researchers working with the Tohono O'odham Nation conduct themselves in accordance with the IRB's guidelines and operate with the highest integrity.

To submit a research project to the TON IRB for review, please draft a proposal that is 10 to 25 pages (double to 1.5 spacing, one-inch margins), not including informed consent sheets or other documents, that contains the following information listed below. Please be aware that depending on a project's topic and/or methodology the IRB may require consultation. The IRB may also request revisions before any review of the documents can take place. The information and documents needed for review are subject to change based on the nature of any given research project submitted. The TON IRB will view documents within 30 days after their submission and will make decisions regarding permits within 60 days after a project's initial review. Please submit a copy of the receipt for administration fees associated with the review of the proposal and permitting. The TON IRB is meant to be a resource for researchers, please feel free to email the board at [IRB@tonation-nsn.gov](mailto:IRB@tonation-nsn.gov) if you have any questions or concerns.

Sincerely,  
Tohono O'odham Nation  
Institutional Review Board

Name	Position	Project Title
Please attach a CV for convenience.		
<p><b>Abstract</b> The project abstract should be a brief description of your project that is no more than 150 words.</p> <p><b>Project Overview/Introduction.</b> A project overview should include the following:</p> <ul style="list-style-type: none"> <li>○ Topic <ul style="list-style-type: none"> <li>▪ This should include a general description of your project’s background. All scientific, conceptual, methodological, or other field-specific terms must be defined.</li> </ul> </li> <li>• History of topic <ul style="list-style-type: none"> <li>▪ There should be enough background information for a beginner reader on your research topic.</li> </ul> </li> <li>• Research intervention <ul style="list-style-type: none"> <li>▪ State the intervention your research is attempting to make. The board recognizes that research is a process and understands that a project's intervention may not be the same at the end of a research project.</li> </ul> </li> </ul>		
<b>Data and Methodology</b>		
Research Question(s)		
<p><b>Data Collection</b></p> <ul style="list-style-type: none"> <li>• Describe the inclusion or exclusion of human subject participants and/or data specimens.</li> <li>• Outline how research participants will be recruited. If flyers or other materials will be used, please send drafts with your research proposal. The Nation’s IRB understands that recruitment materials are subject to change, however, if approved research materials are to be updated with the Nation’s IRB.</li> <li>• In the case of human subjects’ research, list if research participants will be compensated. If yes, please include what compensation will consist of and methodological justification for compensation.</li> <li>• For research with non-human subjects such as plants and wildlife please describe protective measures that will be applied during the phase of data collection. For example, you will limit the total</li> </ul>	<p><b>Biological Samples</b></p> <ul style="list-style-type: none"> <li>• Section 8101 of the Nation's research code defines biological samples as, but not limited to, “bacteria and other microorganisms, bacteria, plant, animal, or any human biological materials, genetic samples, any copies of the original genetic samples, any cell lines containing copies of the original genetic samples, and data derived from these samples.” <ul style="list-style-type: none"> <li>○ Section 8106 (9) of the Nation’s research code also states, “Ownership of specimens, control by the individual research participants over the use of their own specimens, and the Nation’s control over the current and future use of the specimens must be disclosed and agreed to by the researcher and the IRB prior to a permit being issued.”</li> </ul> </li> <li>• Researchers are required to always maintain a complete list outlining descriptions of the samples or information, the source of biological</li> </ul>	

number of survey days and crew size to minimize human traffic in the said wildlife habitat.

- Note: The Tohono O’odham Nation’s IRB prohibits the making of new walking/hiking trails and roads for data collection on the Nation so that wildlife is not disturbed. Historic trails and roads, and those made by Border Patrol agents may be used. Please include maps of trails that will be used going in and out of the survey area. Describe survey drop-off and pick-up locations if there are multiple crews walking transects.
- Describe your emergency management plan. The Tohono O’odham Nation is located in the Sonoran Desert where temperatures can reach triple digits. For this reason, it is imperative you develop an emergency plan with the contact information of appropriate emergency services (T.O.N. police department, hospital, etc.). If possible, take a satellite phone and always pack extra water and an emergency kit. We also ask that you consider whether your vehicle is appropriate for the terrain you will be working in.
- Briefly offer 5-7 sentences about your understanding of the Tohono O’odham political system (e.g., the Tribal Nations relationship to other Tribes).

samples, the purpose of each sample, the person who is responsible at each location that will house physical samples or information regarding biological samples collected from the Nation’s members.

- Upon the termination, cancellation, or the completion of a project, all biological samples must be returned to the Tohono O’odham Nation.
  - Detail how biological samples will be returned to the Tohono O’odham Nation, and how the cost of equipment and the maintenance of biological samples will be paid for.
- Explain how biological samples will be returned to the Tohono O’odham Nation once the proposed research project is complete, is canceled, or in the case that the proposed research is approved and later terminated.
  - Detail how the equipment necessary to maintain biological samples will be either donated or purchased for the Tohono O’odham Nation once the proposed project is complete, canceled, or terminated.
  - Section 8109 (1) of the Nation’s research code states “If the IRB decides to revoke a research permit or any portion thereof for good cause and requests the return of all biological samples, the researcher, and any other parties, must immediately comply.”
  - Section 8109 (6) of the Nation’s research code states “No entity may seek to patent or use for commercial purposes any biological materials obtained from the Nation or its members, from the Nation’s Lands, or under the authority of the Nation. This includes genetic samples, any copies of the original genetic samples, any cell lines containing copies of the original genetic samples, and data derived from these samples.”

<p><b>Scope and Timeline of Data Collection</b></p> <ul style="list-style-type: none"> <li>• Provide a timeline that outlines how long it will take to complete data collection, when data collection will take place (e.g., twice a month for 3 months), and when other research tasks will approximately take place.</li> </ul>	<p><b>Location</b></p> <ul style="list-style-type: none"> <li>• If your project will be taking place at an archeological site, village currently occupied, district, or any geographic location, please state the location and why the location is important to your project. Please provide location coordinates (UTMs preferred), maps, and shapefiles if any have been developed for your project. State how many times you will be visiting your proposed project site, when, and for the duration (e.g., every first and fourth Saturday of the month from 6 AM to 12 PM for a twelve-month period).</li> <li>• If you will be visiting archives or other off-reservation sites for data collection, please list these locations/archives.</li> <li>• Geographical and Locational Data <ul style="list-style-type: none"> <li>○ Note: The Tohono O’odham Nation IRB prohibits point location maps and coordinates and other locational data such as physical maps and shapefiles from being shared with anyone not listed on a project’s IRB application. In your writeup, geographical and locational data should be referred to in broad terms like “centrally located on the Tohono O’odham Reservation” or “North of highway 86.” The use of historic maps and location descriptions from already published materials may be used.</li> <li>○ You must provide a resolution from the village and district to work in the area your research will be taking place.</li> </ul> </li> </ul>
<p><b>Population</b></p> <ul style="list-style-type: none"> <li>• If your project involves research with Tohono O’odham Elders (55 years and older), please indicate what role Elders will play in the research being proposed and why their knowledge is necessary to the research project.</li> <li>• If the project involves research with human subjects or any other biological specimens, please state the specimen and why it is important to the research project.</li> <li>• List the districts and communities that you will be working with or plan to work with in your research. If you have received prior approval in an individual district or community, attach all documentation authorizing your current or past research projects (e.g., village and district resolutions).</li> </ul>	
<p><b>Burden Hours</b></p> <ul style="list-style-type: none"> <li>• State the approximate number of hours that will be required of members of the Tohono O’odham Nation during data collection.</li> </ul>	<p><b>Recording</b></p> <ul style="list-style-type: none"> <li>• Include what devices will be used to record information.</li> <li>• Describe how participants will clearly understand all plans for recorded information and any potential future uses of recorded information. <ul style="list-style-type: none"> <li>○ Participants must consent to participating in your study. A copy of their consent must be provided to the IRB (audio, video, or written consent are acceptable)</li> <li>○ No personal device may be used for data collection.</li> </ul> </li> <li>• State how you will store the data you collect throughout your study.</li> <li>• Copies of video, audio, and photographs taken throughout your study must be provided to the IRB.</li> </ul>

<p>Himdag and T-Apedag</p> <ul style="list-style-type: none"> <li>○ O’odham Himdag, our way of life and T-Apedag, our well-being are central to how we organize our communities, our government, and conduct research. How will you take into consideration Tohono O’odham Himdag and T-Apedag in your research design and practices?</li> </ul>	<p>Benefit and Risks</p> <ul style="list-style-type: none"> <li>○ Indicate any potential opportunities and benefits for the O’odham individuals, individual villages and districts, the Tohono O’odham Nation, and or Native Americans and Indigenous peoples.</li> <li>○ Outline all potential and inherent risks to the physical, psychological, social, economic, political, and cultural wellbeing of the Tohono O’odham Nation that are associated with the research being proposed. <ul style="list-style-type: none"> <li>▪ List all steps that will be taken to minimize potential and inherent risks.</li> </ul> </li> </ul>
<p>Data storage and Ownership</p> <ul style="list-style-type: none"> <li>○ Describe how and where data will be stored, who will have access to data collected, and how long researchers will need to have access to data collected from members of the Tohono O’odham Nation.</li> <li>○ Describe how collected data will be returned to the Nation and the justification for data that will not be returned to the Nation.</li> <li>○ Describe how the Tohono O’odham Nation will be acknowledged in published materials.</li> <li>○ If the proposed research is being done in collaboration with a nonprofit, school, research group, or any other entity or institution, please list these institutions and specify the scope of their involvement in data collection, data analysis, and writing.</li> <li>○ The Board may determine the final place for data (e.g., data may not be destroyed and housed on the Nation).</li> </ul>	<p>Collaboration and Access to Information, Biological, and/or Non-biological Samples</p> <ul style="list-style-type: none"> <li>○ Attach a curriculum vitae of all individuals who will have access to biological samples or data pertaining to the Tohono O’odham Nation. This includes: <ul style="list-style-type: none"> <li>▪ Post doctoral fellows</li> <li>▪ Doctoral students and candidates</li> <li>▪ Scientific and other collaborators</li> <li>▪ Undergraduate research assistants</li> <li>▪ All others who might have access to any biological samples collected from members of the Tohono O’odham Nation.</li> </ul> </li> <li>▪ <b>ALL researchers</b> who intend to analyze, present, and publish information collected from biological samples and/or data collected from the Tohono O’odham Nation must undergo review by the Nation’s IRB.</li> <li>▪ Section 8109 (3) of the Nation’s research code states, “No biological samples from this study may be released to, or used by, any other researcher, research institution, or any other entity, whether public or private, without the prior and fully-informed written approval of the IRB.</li> <li>▪ Section 8109 (5) of the Nation’s research code states, “Any situation where biological samples will leave the possession or control of the researcher will require review by and a separate agreement with the IRB and the external party in accordance with this Chapter.”</li> </ul>

<p><b>Ethnographic Research &amp; Ethnoarchaeology</b></p> <ul style="list-style-type: none"> <li>○ Please state whether you will be using already documented interviews or if you will be creating new data by conducting interviews <ul style="list-style-type: none"> <li>▪ Describe how your interviews will be taking place (Virtual, in person, through email). If interviews are taking place in-person, the researchers must adhere to the Nation’s COVID-19 policies.</li> <li>▪ Provide a list of questions you will be asking participants</li> </ul> </li> <li>● Describe whether you will be creating new data through excavation. If so, provide state site number(s), clearly state current ownership of land, and how the creation of new data will benefit your ethnoarchaeological study.</li> <li>● If you are working with a collection of artifacts, please indicate where the collection is currently housed and where they originate from (e.g., housed at the Arizona State Museum originally collected from AZ AA:12:34).</li> </ul>	<p><b>Funding</b></p> <ul style="list-style-type: none"> <li>● List funding sources that you have received for the project you are submitting for IRB approval. For research grants that require a budget, please submit their budget in addition to your research proposal.</li> <li>● To your knowledge will the requirements of the funding you’ve received or plan on applying for require additional interpretation of the data collected? Or require publication in an academic journal? If so, please state the journal and any other additional requirements. <ul style="list-style-type: none"> <li>○ Archiving data and materials collected (even after IRB approval), at any institution, requires additional IRB approval.</li> </ul> </li> </ul>
<p><b>Positionality</b></p> <ul style="list-style-type: none"> <li>● Please describe how the positionality of all researchers involved in the proposed project might influence data collection and analysis. For example, will the researcher’s academic or social position, cultural heritage, or gender benefit the research design and outcomes?</li> </ul>	<p><b>American Indian Citizenship or Descendancy</b></p> <ul style="list-style-type: none"> <li>○ If you are a citizen or descendant of an American Indian Nation, please attach proof of citizenship or descendancy.</li> <li>▪ As an independent tribal IRB, it is not the IRB’s position to determine anyone’s citizenship status or identity. Being Tohono O’odham, Native American, or Indigenous is also not required when applying for a research permit. The Tohono O’odham Nation’s Institutional Review Board is interested in working with researchers from all walks of life. However, we recognize the real violence of ethnic fraud and feel it necessary to protect Tohono O’odham tribal members, histories, stories, and other materials. Thus, we find it necessary to ensure that when tribal membership is claimed that these claims are recognized by the communities themselves</li> </ul>
<p><b>Informed Consent</b></p> <ul style="list-style-type: none"> <li>○ If this project includes human subjects, describe how consent will be obtained.</li> <li>○ State whether research participants will be anonymized and the methodological justification for anonymization.</li> </ul>	<p><b>Dissemination Description</b></p> <ul style="list-style-type: none"> <li>○ Include how information collected will be disseminated to the larger Tohono O’odham community. <ul style="list-style-type: none"> <li>▪ Community/Nation presentations and written products as well as input from community about data interpretation</li> </ul> </li> </ul>

<ul style="list-style-type: none"><li>○ Included drafts and/or finalized informed consent sheets that will be used for the proposed project.</li><li>○ Discuss any possible physical or physiological harms participants might experience.</li></ul>	<ul style="list-style-type: none"><li>▪ Presentations</li><li>• Note: Community presentations are required for all research permit holders.</li><li>• Written Products</li><li>• Other products (digital story, etc.)</li><li>• The Board strongly encourages a Tohono O’odham author to be included in publications.</li></ul>