

Department of the Interior
Policies for Considering Indigenous Knowledge
An Informational Presentation by L. Michelle Baker, PhD¹
[The Conservation Writing Pro](#)

Introduction

On December 5, 2023, the Department of the Interior (DOI; Department) implemented [Service Manual Section 301 DM 7](#), “Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research” (Service Manual). In response to its own directive to propagate relevant guidance, the DOI published the [Handbook](#) “Procedures for the Inclusion and Application of Indigenous Knowledge in the Actions of the Department” (Handbook) on January 17, 2025.

Together, these two documents provide the policy framework under which the DOI includes Indigenous Knowledge as part of its mandate to use the best available scientific and commercial data in the Department’s decision-making processes.

This presentation is intended to raise awareness about the framework and to offer suggestions for its implementation to both Indigenous Knowledge Holders and Department employees. It is divided into five parts:

- (1) Table of Contents, Preview
- (2) Best Available Science and Indigenous Knowledge
- (3) For Indigenous People
- (4) For DOI Personnel
- (5) Resources

(1) Table of Contents, Preview

The Handbook is presented in five chapters and ten appendices, as follows:

Section 1. How to Use this Handbook

Section 2. Embracing Indigenous Knowledge

Section 3. Historical Context of the Disruption of Indigenous Knowledge

Section 4. Elevating, Including, and Applying Indigenous Knowledge in Departmental Actions and Scientific Research.

¹ As the founder of [Conservation Writing Pro](#), Michelle has spent the last ~20 years teaching environmental scientists how to write with greater clarity, working at the intersection of environmental science and regulation. She is the author of [Writing in the Environmental Sciences: A Seven-Step Guide](#) (Cambridge, UP 2017) and the developer of courses including Argument for Scientists, Writing Science with Clarity, and Keys to Effective Editing.

Section 5. Case Study—Alexander Archipelago Wolf Species Status Assessment.

Appendix 1. 301 DM 7: Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research. *refers readers to the Service Manual.*

Appendix 2. Understanding Your Proficiency to Include Indigenous Knowledge. *A self-assessment questionnaire intended to help DOI employees determine their ability and fitness for working with IK.*

Appendix 3. Quick Reference—Key Points and Actions in Elevating Indigenous Knowledge To Be on Equal Footing with Other Scientific Approaches and Information. *Constitutes a quick-reference for actions to be taken cross-walked to the Department Manual chapter.*

Appendix 4. Practical Tips Flow Chart—Elevating Indigenous Knowledge. *Offers a sample flowchart for the work flow from project planning to execution.*

Appendix 5. Elevating Indigenous Knowledge in Statutes and Regulations. *Describes the relationship between this policy and other statutes and regulations.*

Appendix 6. Statutory Protections of Indigenous Knowledge. *Describes the statutes that protect IK.*

Appendix 7. Mechanisms for Compensating Knowledge Holders and Payments to Support Tribal and Indigenous Participation. *Describes various ways of compensating IK holders.*

Appendix 8. Paperwork Reduction Act. *Boilerplate language summarizing the information necessitated for all government policy.*

Appendix 9. Potential Performance Standards for Cultural Competencies. *Offers some examples of performance responsibilities for employees engaged with and in charge of procuring and curating IK.*

Appendix 10. Additional Resources. A bibliography sorted by subject.

(2) Best Available Science and Indigenous Knowledge

In statutes and regulations related to the environmental sciences and natural resources, the U.S. Federal Government has long referenced “best available commercial and scientific data” as the gold standard. With these policies, the U.S. Department of Interior acknowledges that for too long, this standard has been interpreted to mean the best available commercial and scientific data generated under a Western knowledge system that privileges one discourse type at the expense of others. The two policies referenced here, Service Manual Chapter 7 and the accompanying Handbook, serve as an attempt to rectify this exclusionary attitude and re-integrate Indigenous Knowledge into the Department’s decision-making processes.

The Service Manual defines Indigenous Knowledge broadly, using a set of “agreed upon universal concepts” (301 DM 7.4.A) that consider the natural world in terms of relationships, not resources (Handbook, p. 4). The definition focuses on Indigenous Knowledge’s experiential as well as its informational aspects and its holistic applicability to “biological, physical, social, cultural, and spiritual systems” (301 DM 7.4.A), thus forming a comprehensive system of thought.

The Handbook acknowledges that “Western knowledge systems have been privileged as the dominant paradigm and have often dismissed Indigenous Knowledge as inferior” (p. 13). To re-establish Indigenous

Knowledge as knowledge system equivalent to those derived from Western philosophies and histories, which the Handbook “term[s] “other scientific approaches’ [...] because Western science incorporates scientific elements developed outside of the Western part of the world” (p. vii), the Handbook offers the following explanation of research paradigms in general:

Research paradigms provide frameworks that guide disciplinary theories, practices, and ultimately, methods. Embedded in research paradigms are assumptions about the nature of reality (ontology), how knowledge is gained (epistemology), and the tools and approaches used to gain and validate knowledge (methodology). Indigenous paradigms and paradigms based in Western worldviews often differ in these embedded assumptions (ontology, epistemology, and methodology) that guide research. (Handbook p. 37)

The Handbook further acknowledges that the fundamental principles upon which Indigenous Knowledge is based, “such as the relationship and interconnectedness of humans and ecosystems,” “are recognized as sound and necessary principles that can be relied upon in decision making” (p. 3). Thus, both the Service Manual and the Handbook reframe Western scientific knowledge, define Indigenous Knowledge as an equivalent research paradigm, and direct DOI employees to rely upon both in their decision-making processes.

(3) For Indigenous People

These policies have many implications for Indigenous People, Tribal Nations, Native Hawaiians, and Pacific Islanders, each of whom is treated slightly differently by the U.S. Congress and under the U.S. Constitution.² Each group will want to develop its own response. The following suggestions are offered as starting points.

(a) Ensure Accurate Representation. Both the Service Manual and the Handbook’s Foreword provide context regarding the people to whom these policies apply, specifically, Indigenous People, Tribal Nations, Native Hawaiians, and Pacific Islanders. Chapter 3 of the Handbook also describes some of the ways in which Indigenous People and the knowledge they possess were disrupted, discontinued, or eradicated by the U.S. Federal Government. All groups of Indigenous People should review these legal and contextual descriptions to ensure that they accurately reflect their own experiences.

(b) Free, Prior, and Informed Consent. These DOI policy documents state that Indigenous Knowledge Holders must be treated according to the United Nations’ guidelines of Free, Prior, and Informed Consent (FPIC), specifically as follows:

Free: Knowledge Holders should not be coerced or pressured into sharing Indigenous Knowledge with the Department.

Prior: Knowledge Holders should be involved at the earliest stage and consent should be received before Indigenous Knowledge is shared.

² This presentation focuses exclusively on the status of present policy and refrains from speculating on the injustice of such various treatments, their histories, or their ramifications.

Informed: Knowledge Holders should be provided information regarding the Bureau or Office's request for Indigenous Knowledge and understand the potential risks and opportunities of sharing their Indigenous Knowledge.

Consent: Affirms the right of Indigenous Peoples to (1) agree to participation, (2) decline or withdraw participation without any repercussions, legal or otherwise, or (3) agree with conditions. (Handbook, p. 8)

(c) Knowledge Dissemination. The DOI has certain statutory obligations regarding the sharing of information that comes into its possession, and DOI employees should advise Indigenous People of this legal obligation before any information-sharing commences. Indigenous People have the rights to withdraw from participation at any time and to subsequently reengage (Handbook, pp. 8–9), but they may have limited rights regarding what happens once they share Indigenous Knowledge. Thus, Indigenous Knowledge Holders should carefully consider what to share and when, and while they may be informed of Department responsibilities by Department employees, such Knowledge Holders may wish to confer with independent legal counsel or members of their own groups before and during knowledge-sharing.

(d) Compensation. IK Holders must be compensated for their time and knowledge and are encouraged to work with their communities to develop compensation parameters that are in line with those offered by the DOI. For more information on the latter, see the Handbook section "Compensating Knowledge Holders for Time and Services" (p. 23) and Appendix 7, "Mechanisms for Compensating Knowledge Holders and Payments to Support Tribal and Indigenous Participation." Similarly, a number of federal policies are related to hiring Knowledge Holders, specifically, "(1) the Indian Preference Policy, (2) Intergovernmental Personnel Act Mobility Program, and (3) Indian Self-Determination and Education Assistance Act" (Handbook p. 23).

(e) Training. The DOI has developed training for implementing this policy. While the training is designed for DOI employees, Indigenous People should consider attending to ensure their interests are properly represented. More information is available on DOI Talent, where the training is titled "Indigenous Knowledge: Building Awareness of and Honoring Indigenous Knowledge." See <https://www.fws.gov/training/how-to-register-for-courses-in-DOI-Talent>, External, Non-DOI Customers for more information.

(f) Knowledge Presentation Forms. Manual 301 DM 7 acknowledges Indigenous Knowledge is available in formats such as stories, songs, or dance. The Service Manual directs the DOI to develop guidance on their interpretation, but the Handbook simply reiterates the Manual's directive. Consider developing principles or methodologies for extracting decision-making information from presentation modes that differ from a monograph or research article, such as hula, oli, or mele.

(g) Arbitrary and Capricious Use. The Service Manual and Handbook do not have the same status as a statute or regulation, meaning that the DOI's failure to comply with the policy is not sufficient to warrant a lawsuit. However, all DOI policy must be applied consistently across the United States. Indigenous People, including Native Hawaiians and Pacific Islanders, should monitor DOI decisions to ensure the fair and equitable use of Indigenous Knowledge and treatment of its holders. Failures in this regard can be deemed "arbitrary and capricious," resulting in a decision's remand or reversal.

(4) For DOI Personnel

(a) Raise Personal Awareness. DOI employees are each individually responsible for ensuring that all DOI policies are upheld, meaning each employee should obtain and review copies of the Service Manual Chapter and the Handbook. Employees should also consider taking the DOI training, “Indigenous Knowledge: Building Awareness of and Honoring Indigenous Knowledge” (available on DOI Talent). DOI employees engaged in the decision-making space should familiarize themselves with the best practices outlined in Chapter 4 and the checklists and flowcharts offered in Appendices 3 and 4.

(b) Get Help Engaging the Community. In the decision-making context, engage local partners early and often. A call-out box on p. 28 of the Handbook called “Promising Practices” offers suggestions for how to reach out to the community. Be aware that the DOI has resources such as [Tribal Liaison Officers](#) and an Indigenous Knowledge Community of Practice (via an internal SharePoint site). Help your colleagues by compiling and disseminating resources as you discover them. Finally, understand that because many Indigenous People were forced to leave their lands, an absence of inhabitation does not equate to an absence of interest or available knowledge (Handbook, p. 22). Recognize that a decision NOT to interact must be respected but can also be rescinded, resulting in re-engagement that should not be penalized.

(c) Self-Reflect and Self-Assess. None of us is a blank slate; we all have preconceived biases. The Handbook acknowledges that treating Indigenous Knowledge and Western knowledge systems with equivalence may be uncomfortable, especially for individuals trained to hold the latter in high esteem. Suggestions are offered for employees to self-assess their potential biases and individual proficiencies at applying IK (see Handbook, p. 2 and Appendix 2).

(d) Take Ownership for Your Actions. This DOI policy recognizes that, although acting on behalf of a U.S. Federal department, DOI employees are individuals who engage with other individuals on important and sensitive topics. Therefore, the Handbook suggests that DOI employees “should introduce themselves as individuals, who they are, where they come from, and what motivates them, not just professional titles, and roles” (Handbook, p. 28). Employees are also encouraged to approach Indigenous Knowledge Holders with humility, awareness, and good intentions (Handbook, p. 29–30). A good place to begin is by educating yourself about the community, their history, and any meeting protocols or etiquette that require your compliance (Handbook, pp. 30–33).

(5) Resources³

Climate and Traditional Knowledges Workgroup [CTKW], 2014, Guidelines for considering traditional knowledges in climate change initiatives, at <https://climatetkw.wordpress.com/>.

Huntington, H. 2019, The many dimensions of knowledge: National Park Service. [Available at <https://www.nps.gov/subjects/tek/henry-p-huntington.htm>.]

³ Regrettably, most of the resources provided by the DOI are generated either internally or via the UN. More resources developed by Indigenous Knowledge Holders are needed. If you are aware of such, please contact the author of this presentation, [Michelle Baker](#), so they can be added to this list.

- Kūlana Noi‘i Working Group, 2021, Kūlana Noi‘i, version 2.0: Honolulu HI, University of Hawai‘i Sea Grant College Program, 22 p., at https://seagrant.soest.hawaii.edu/wp-content/uploads/2021/09/Kulana-Noii-2.0_LowRes.pdf.
- National Oceanic and Atmospheric Administration, 2024, NOAA tribal resources and updates: National Oceanic and Atmospheric Administration web page, at <https://www.noaa.gov/legislative-and-intergovernmental-affairs/noaa-tribal-resources-updates>.
- National Park Service, 2023, Indigenous knowledge and traditional ecological knowledge, National Park Service web page, at <https://www.nps.gov/subjects/tek/guides.htm>.
- Rinkevich, S., Greenwood, K., and Leonetti, C., 2011, Traditional ecological knowledge for application by service scientists: U.S. Fish and Wildlife Service Fact Sheet, 5 p., at <https://www.fws.gov/sites/default/files/documents/TEK-Fact-Sheet.pdf>.
- United Nations, 2014, The knowledge of indigenous peoples and policies for sustainable development—Updates and trends in the second decade of the world’s indigenous people: United Nations report, 15 p., at https://www.un.org/en/ga/69/meetings/indigenous/pdf/IASG%20Thematic%20Paper_%20Traditional%20Knowledge%20-%20rev1.pdf
- United Nations, 2007, United Nations declaration on the rights of indigenous peoples: United Nations Resolution, 32 p., at https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
- United Nations Declaration on the Rights of Indigenous Peoples and Free, Prior, and Informed Consent: United Nations Declaration on the Rights of Indigenous Peoples (2007), <https://documents.un.org/doc/undoc/gen/n06/512/07/pdf/n0651207.pdf>
- United Nations Educational, Scientific, and Cultural Organization [UNESCO], 2024, Local and Indigenous Knowledge Systems (LINKS): United Nations Educational, Scientific, and Cultural Organization, at <https://www.unesco.org/en/links>
- U.S. Geological Survey, 2023, Webinar series—Incorporating indigenous knowledges into Federal research and management: U.S. Geological Survey web page, at <https://www.usgs.gov/programs/climate-adaptation-science-centers/webinar-series-incorporating-indigenous-knowledges>.