

# Planning for the Approvals Process

In addition to developing <u>data agreements</u>, getting the right approvals is an important part of the data sharing process - both for those sharing data and those receiving data. This document outlines some important considerations for planning for the approvals process.

## **Types of Approvals**

Tribes and Native-serving organizations, including Tribal and urban Indian organizations and Tribal Epidemiology Centers (TECs), all have their own unique approvals processes.

#### Types of approvals that may be needed for obtaining or sharing data include:

- Approval through a Tribal council or governing board
- Approval from Tribal research review committees or boards

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• Approval from specific departments within a Tribe or organization

To understand what approvals might look like for you, learn who is required to be involved with approving data sharing and what the process looks like. If possible, ask those who have been through the process before about possible challenges that may arise and how to overcome these. This will help you create a more realistic timeline.

#### Keep in mind

- Approvals are required for both those sharing data and those receiving data. Remember to account for both your own internal approval process and your partner's process as well.
- Preparing approval documents creates demands on staff. If you are new to this type of work, ask what specific documents are needed and how long they typically take to complete.
- If you are seeking approvals because you are planning to make a request for data, consider checking out these tips for obtaining health data.
- Approval processes are always changing. In the end, <u>building strong relationships</u> will help pave the way.
- If you need to make an in-person presentation to justify obtaining or sharing data, consider reading these ideas for <u>clearly communicating about data sharing</u>.

### Institutional Review Boards (IRBs)

If you are requesting or sharing data that will be used for <u>human subjects research</u>, the project will need oversight from an IRB. Data that are being used for public health practice typically do not need IRB oversight. However, your Tribe or organization may require that you submit any data collection and use plans to Tribal committees or boards for approval.

This list of Indian Health Service and Tribal IRBs is a great starting place to find local contacts. However, note that there may be Tribal research committees or boards not listed.

To learn more about the difference between data being used for research vs public health practice, read <u>this document</u>.

#### Keep in mind

Preparing documents for IRB review is an involved process and will take time. It is typical for IRBs to need clarification and request several rounds of changes. Because some IRBs do not meet regularly, learn the IRB's schedule and plan for multiple rounds of review and changes in your timeline.

#### A Note for Local, State, and Federal Partners Seeking to Work Respectfully with Tribes and Native-serving Organizations

It is not uncommon for Tribal and Native-serving organization approvals to take longer than you might expect. It is important to be flexible with your project timelines. There is no better way to alienate your partner than pressure them to speed up an approval process that they have little or no control over. Use any additional time you may have to continue to <u>build your relationship</u> and connect with the community or communities you are working with. Remember, relationship and trust building often takes years. There is a long history of non-Tribal entities forming loose connections with Tribes and Native-serving organizations only to obtain data to further their own goals and interests. Working successfully with Tribes and Native-serving organizations should be a collaborative effort where partners make a long-term commitment to working together. Learn more here.

## Need Help?

These <u>data supports</u> can help Tribes and Native-serving organizations understand what data are available to you, how to navigate the data sharing process, and support you in learning about your right to <u>Tribal data sovereignty</u> and exercising your <u>public health authority status</u>.



Got questions? Contact us at ideanw@npaihb.org or visit NativeDATA.npaihb.org.

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