



USET

SOVEREIGNTY PROTECTION FUND

Washington, DC Office

1730 Rhode Island Ave., NW, Suite 406
Washington, DC 20036

Nashville, TN Office

711 Stewarts Ferry Pike, Suite 100
Nashville, TN 37214
P: 615-872-7900 | F: 615-872-7417

December 10, 2025

Clayton Fulton
Acting Director
Indian Health Service
5600 Fishers Lane, Mail Stop: 08E86
Rockville, MD 20857

Dear Acting Director Fulton,

On behalf of the United South and Eastern Tribes Sovereignty Protection Fund (USET SPF), we write to express our concern regarding the lack of in-person Tribal consultation sessions in the Nashville Area on the Indian Health Service (IHS) realignment process. While we appreciate that IHS created additional opportunities for engagement on this issue, USET SPF is disappointed that there continue to be no opportunities for in-person engagement on realignment in the Nashville Area.

USET SPF is a non-profit, inter-tribal organization advocating on behalf of thirty-three (33) federally recognized Tribal Nations from the Northeastern Woodlands to the Everglades and across the Gulf of Mexico.¹ USET SPF is dedicated to promoting, protecting, and advancing the inherent sovereign rights and authorities of Tribal Nations and in assisting its membership in dealing effectively with public policy issues.

The Nashville Area of IHS is made up of 36 Tribal Nations in a geographic area spanning over 20 states, with IHS services provided through four federal direct service units, twenty-six Tribally administered programs, and three Urban Indian programs. According to the IHS website itself, the Nashville Area is “the most geographically and culturally diverse Area within IHS.” Our Area represents a vast geographical area made up of Tribal Nations with priorities and concerns that may differ from those in other IHS Areas. As “first contact” Nations, Tribal Nations in the Nashville Area have been forced to contend with colonial and governmental forces that have affected our health, wellness, economic and educational opportunities for centuries, and as a result have developed unique priorities and concerns. Despite this, the Tribal Nations in

¹ USET SPF member Tribal Nations include: Alabama-Coushatta Tribe of Texas (TX), Aroostook Band of Micmac Indians (ME), Catawba Indian Nation (SC), Cayuga Nation (NY), Chickahominy Indian Tribe (VA), Chickahominy Indian Tribe—Eastern Division (VA), Chitimacha Tribe of Louisiana (LA), Coushatta Tribe of Louisiana (LA), Eastern Band of Cherokee Indians (NC), Houlton Band of Maliseet Indians (ME), Jena Band of Choctaw Indians (LA), Mashantucket Pequot Indian Tribe (CT), Mashpee Wampanoag Tribe (MA), Miccosukee Tribe of Indians of Florida (FL), Mississippi Band of Choctaw Indians (MS), Mohegan Tribe of Indians of Connecticut (CT), Monacan Indian Nation (VA), Nansemond Indian Nation (VA), Narragansett Indian Tribe (RI), Oneida Indian Nation (NY), Pamunkey Indian Tribe (VA), Passamaquoddy Tribe at Indian Township (ME), Passamaquoddy Tribe at Pleasant Point (ME), Penobscot Indian Nation (ME), Poarch Band of Creek Indians (AL), Rappahannock Tribe (VA), Saint Regis Mohawk Tribe (NY), Seminole Tribe of Florida (FL), Seneca Nation of Indians (NY), Shinnecock Indian Nation (NY), Tunica-Biloxi Tribe of Louisiana (LA), Upper Mattaponi Indian Tribe (VA) and the Wampanoag Tribe of Gay Head (Aquinnah) (MA).

Because there is Strength in Unity

our Area have historically been overlooked by the U.S. government. USET/USET SPF was established to amplify the voices of our member Tribal Nations as they seek to advance and promote Tribal-federal relations and achieve improved execution of trust and treaty obligations. Over the years, Tribal Nations in our Area have often needed to advocate for equitable funding and attention from the federal government, including for the protection of our Area office.

When considering proposed changes as significant as agency realignment, it is puzzling that IHS has again neglected to provide Tribal consultation opportunities in its largest and most diverse Area. This is particularly concerning considering USET SPF and others raised this concern with IHS when the original consultation notice was published in early November 2025. We acknowledge that IHS added a virtual consultation session on December 22, 2025, in response to Tribal feedback, but we contend that this does not satisfy the need for Tribal consultation specifically in the Nashville Area. Further, we fear the timing of that session during the week of the Christmas holiday may have a chilling effect on attendance on both the Tribal and federal sides. Taken in combination, the lack of a specific opportunity in the Nashville Area and the timing of the virtual session may result in the concerns and priorities of Nashville Area Tribal Nations not being properly heard and considered.

USET SPF respectfully requests that IHS create an additional opportunity for Tribal consultation on realignment within the Nashville Area. A proposed change of this magnitude must undergo robust Tribal consultation and that necessarily includes opportunities for engagement in all regions of Indian Country. We hope that IHS will correct this oversight and commit to meaningful consultation on realignment in all Areas. USET SPF and our member Tribal Nations stand ready to engage with and assist IHS through this realignment effort, but we must be given appropriate opportunities to do so. Should you require further information or require additional insights into the Nashville Areas concerns, please contact Ms. Liz Malerba, USET SPF Director of Policy and Legislative Affairs, at LMalerba@usetinc.org or 615-838-5906.

Sincerely,



Kirk Francis
President



Kitcki A. Carroll
Executive Director