



USET

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Transmitted Electronically
To TIBCimprovement@bia.gov

April 17, 2026

Jason Bruno
Deputy Assistant Secretary – Management
Office of the Assistant Secretary – Indian Affairs
U.S Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Deputy Assistant Secretary Bruno,

On behalf of the United South and Eastern Tribes Sovereignty Protection Fund (USET SPF), we submit these comments to the Department of the Interior (DOI), Bureau of Indian Affairs (BIA) in response to its request for comments on improving the efficacy of the Tribal-Interior Budget Council (TIBC). In its March 16, 2026 Dear Tribal Leader Letter (DTLL), we note that the Assistant Secretary of Indian Affairs (ASIA) has expressed a commitment to enhance TIBC and ensure its budget formulation meetings are meaningful, outcome-driven, and responsive to the priorities of Tribal Nations. USET SPF strongly supports the preservation and improvement of TIBC as one of many critical advisory committees that bring Tribal Nations and the federal government together in a proactive, collaborative manner. We also strongly support the preservation of other Tribal advisory entities, such as the DOI Secretary's Tribal Advisory Committee (STAC), across the federal government and remind DOI that these entities are not "duplicative" advisory bodies. Rather, each has critical functions in upholding trust and treaty obligations, improving Tribal-federal relations, and supporting Tribal sovereignty and self-determination. In preparation for the upcoming TIBC meeting in Washington, DC scheduled May 19-20, 2026, USET SPF offers these comments in support of preserving TIBC while advancing its core mission objectives in collaboration with other necessary Tribal advisory entities, such as DOI's STAC.

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.

¹ USET SPF member Tribal Nations include: Alabama-Coushatta Tribe of Texas (TX), 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), Mi'kmaq Nation (ME), 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 Tribe (VA), and the Wampanoag Tribe of Gay Head (Aquinnah) (MA).

Importance of TIBC and Other Tribal Advisory Committees

TIBC was established to provide essential, substantial input to DOI, as Indian Country and the federal government collaborate on formulating a meaningful budget for Indian programs—one that addresses our priorities and supports our inherent sovereignty and self-determination in pursuit of Nation building and rebuilding. Tribal advisory committees remain a critical part of the Tribal-federal relationship and the accordant obligation for the federal government to consult with Tribal Nations in the formulation of policy that affects us, including the delivery of the funding that we are owed and was promised. Much like its sister advisory committee, the Indian Health Service National Tribal Budget Formulation Workgroup, TIBC ensures that the diverse circumstances and requirements of Tribal Nations across the country are reflected in the Department’s annual budget request. With the recent release of the Fiscal Year 2027 request for BIA proposing a \$744 million cut to the agency, the unequivocal purpose and preservation of TIBC is now more relevant than ever. DOI must ensure that it is appropriately utilizing TIBC to gather critical input from Indian Country on Tribal budget obligations and priorities.

Recalibrating the Focus of TIBC

The federal government’s trust and treaty obligations are the direct result of the millions of acres of land and extensive resources ceded to the U.S.—oftentimes by force—in exchange for which it is legally and morally obligated to provide benefits and services in perpetuity. However, at no point has the federal government fully delivered upon these solemn trust and treaty obligations. Therefore, meaningful change must be made in how the federal government delivers on the federal funding that is promised. These principles are at the very core of why TIBC was established—to provide critical, substantial input to DOI on formulating a meaningful budget for Indian programs that addresses our priorities and supports our inherent sovereignty and self-determination in pursuit of Nation building and rebuilding.

USET SPF recognizes that the TIBC budget formulation process has often become mired in ancillary policy discussions that—though unquestionably important and relevant to Indian Country—avert critical budget formulation discussions. While policy-specific discussions are important to budget formulation and justification processes—and must be included to “tell our story”—they must not become the sole-focus of TIBC. This is primarily the reason STAC was established by DOI at the request of TIBC, to ensure that these critical policy discussions can directly occur with ASIA and other Departmental officials. For these reasons, USET SPF strongly emphasizes that DOI preserves both the TIBC and STAC advisory bodies to ensure that these critical budget and policy discussions have an appropriate venue to take place. We remind DOI that both the TIBC and STAC advisory bodies do not serve duplicative functions. Rather, each has critical functions in the federal budget and policy spaces while operating to improve Tribal-federal relations and support Tribal inherent sovereignty and self-determination.

Since policy and budget specific discussions often intersect in the TIBC and STAC spaces, we further emphasize that there must be greater coordination, collaboration, and participation between TIBC and STAC. USET SPF emphasizes that the continued existence and operation of these advisory bodies is absolutely necessary. TIBC and STAC have specific directives to achieve certain goals and objectives. Yet, these Tribal advisory bodies share and serve a primary purpose—to improve Tribal-federal relations and collaboration in ways that support Tribal inherent sovereignty and self-determination. As a matter of improving the role of TIBC in the budget formulation process, it must also have representation to participate in STAC meetings. This would alleviate overtly policy-specific discussions that consume time required for critical budget formulation priorities during TIBC meetings. The budget formulation process and discussion on policy implications must complement each other in both the TIBC and STAC meeting spaces, as these issues inextricably impact each other on the ground and can have harmful consequences for Tribal Nations, Tribal citizens, and Tribal communities. Similarly, both TIBC and STAC must remain broadly

regionally representative. This is critical to ensure that the broad interests and priorities of Indian Country are present in these important budget and policy discussions.

Issues like this are why it is critically important for transparent and meaningful dialogue between Tribal and federal officials at both the TIBC and STAC meetings. TIBC must have an improved role and coordination with STAC to provide space for both meaningful budget and policy discussions, since policy directly informs and affects the federal government's delivery of trust and treaty obligations to Tribal Nations, Tribal citizens, and Tribal communities. This coordination and collaboration between TIBC and STAC is needed now more than ever following last year's reductions in force (RIFs), deferred resignation, and voluntary early retirement initiatives launched across the federal government. While RIFs reportedly did not impact personnel at BIA, the deferred resignation and voluntary early retirement programs resulted in critical personnel losses that BIA and other Tribal-serving agencies are now trying to backfill. In light of these activities, DOI and BIA leadership must preserve, support, and improve the continued existence and operations of TIBC and STAC. These advisory bodies serve dual, yet distinct, essential purposes as collaborative entities where important budget and policy discussions can be held with ASIA and senior leadership.

TIBC Representatives Must Be Involved in Any Restructuring Process

In preparation for the upcoming May 19-20, 2026 TIBC meeting, we remind DOI that TIBC representatives must be involved in any restructuring decisions. Changes to TIBC must not occur in a vacuum at Indian Affairs. Rather, TIBC's Tribal representatives must be informed, consulted, and a part of the final decision-making process in any restructuring proposals, finalization, and implementation. In addition, we expect that any restructuring of TIBC will require time and deliberation, lasting longer than the single, day long discussion currently scheduled in May. DOI must keep TIBC representatives informed of its work on this matter and should plan to schedule additional in-person and virtual meetings to continue these important restructuring discussions. We strongly recommend that these discussions take place throughout the remainder of 2026 and perhaps even into the early part of 2027.

The Budget Formulation Process Must Be Improved to Fulfill the Purpose of TIBC

TIBC exists as a critical forum for Tribal representatives and federal officials to convene and collaborate on developing annual fiscal year budget requests for Tribal programs at DOI. USET SPF agrees that the TIBC budget formulation process must be improved. TIBC meetings must focus on addressing serious budget questions and financial perspectives for which it was established to facilitate. As aforementioned, this is the reason why the preservation and continued existence of STAC is so important and why TIBC representation in STAC meetings is needed so that budget and policy discussions complement each other. Creating this TIBC-STAC convergence will ensure that TIBC convenings can solely focus on critical budget and financial discussions important to Indian Country. In addition, for the TIBC budget formulation process to be successful, federal representatives on TIBC—including ASIA—must be present, transparent, and actively participate in discussions with Tribal representatives during this process. There must be open, honest dialogue and active participation by ASIA and other senior officials, as well as the BIA regional directors that participate in TIBC meetings.

Further, we emphasize that open, meaningful, and active dialogue between TIBC Tribal representatives and BIA central and regional office personnel is just as important as active dialogue between BIA central and regional office personnel during these meetings. Too often we have witnessed a disconnect in communication, direction, and collaboration between the BIA central and regional offices. This, in turn, contributes to regional office personnel inappropriately or inadvertently interpreting and implementing central office policy decisions in a manner that has harmful impacts for service delivery under Tribal

programs. This disconnection in policy decision-making and implementation and the budget formulation process is a primary reason why it is critically important that TIBC and STAC are not only preserved but supported by BIA to collaborate with each other. This collaboration will ensure that both policy and budget formulation discussions are informing BIA at the highest levels to guide and support the delivery of trust and treaty obligations to Tribal Nations, Tribal citizens, and Tribal communities. Further, in addition to central and regional office personnel being present during these meetings, USET SPF strongly recommends that all necessary and relevant federal personnel with a Tribal-serving nexus at DOI must be present, active participants in TIBC budget discussions. These important budget formulation sessions must appropriately include DOI personnel that have trust and treaty obligations to provide services to Indian Country.

Conclusion

The very purpose of TIBC is the only justification required for its continued existence and preservation as an advisory body to DOI. It is inappropriate to view, label, or define TIBC as duplicative, unnecessary, or contradictory to supporting the federal government in upholding its trust and treaty obligations to Indian Country. As BIA leadership proceeds in working with TIBC representatives to preserve, improve, and strengthen the budget formulation process for Indian programs, we emphasize that these discussions must occur in a transparent, productive, and meaningful manner. This must begin with ASIA and BIA senior officials—as well as all relevant DOI personnel that provide services to Indian Country—being present and actively engaged in these critical budget formulation discussions with TIBC Tribal representatives. For the budget formulation process to be a successful function of TIBC, federal personnel must be present and actively contribute to these discussions through transparent, open dialogue with Tribal representatives on these important matters. This will ensure that DOI is fulfilling its trust and treaty obligations to develop an annual Tribal budget request that is fully representative of Tribal priorities.

Further, central office leadership must support and encourage active, transparent, and meaningful participation from BIA regional office personnel in TIBC discussions. Regional personnel are critical to upholding the federal government's trust and treaty obligations as they have significant on the ground responsibilities to deliver funds and services to Tribal Nations, Tribal citizens, and Tribal communities. Moving forward, USET SPF stands ready to work with ASIA and BIA senior officials to improve the operation and impact of TIBC. However, we stress that this will also require a commitment from ASIA, BIA senior officials, and regional personnel to have transparent, honest, and meaningful dialogue to improve the budget formulation process that TIBC was established to facilitate. It also requires the preservation of TIBC and STAC, as well as greater coordination and collaboration between these Tribal advisory bodies. We look forward to these important discussions taking place at the upcoming May 19-20, 2026 TIBC meeting and anticipate robust dialogue on these issues with ASIA, BIA senior officials, and regional personnel. Should you have any questions or require further information, please contact Liz Malerba, USET SPF Director of Policy and Legislative Affairs, at LMalerba@usetinc.org or 615-838-5906.

Sincerely,



Chief Kirk Francis
President



Kitcki A. Carroll
Executive Director