

DOI SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication and Education

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December 6, 2013

Kevin Washburn, Assistant Secretary – Indian Affairs
Department of the Interior
1849 “C” Street, NW
4140-MIB
Washington, DC 20240

RE: New Financial Policy for Self-Governance Accounts

Dear Assistant Secretary Washburn:

Recent changes to the self-governance financial accounts policies have come to the attention of the Self-Governance Advisory Committee. We understand that the new process requires recoding of Self-Governance funding being transmitted to the Tribes on a program-by-program, Tribe-by-Tribe basis. While it may be in the best interest of Self-Governance Tribes to have greater transparency in the funding provided, we consider this to be a significant change in operations affecting participating Tribes and contrary to the original intent of the permanent Self-Governance legislation and regulations regarding base funding. Changes as significant as those described to us require Tribal Consultation. Not only do we need to fully understand the new process and procedure, we must ensure that any transition is smoothly conducted and that Tribal concerns are addressed in advance.

Although we are not fully informed about the new process, it appears that it will require additional significant effort to maintain. When the financial systems in the Office of Self-Governance (OSG) were created, one major goal of the Tribes was to streamline bureaucratic systems and ensure timely payment while still maintaining financial accountability. The OSG has been very effective in achieving both of these goals since its beginnings over twenty years ago.

There are several initial specific concerns about the new system, including:

- **Payments to Self-Governance Tribes continue to be made efficiently and timely.**
- **The OSG is appropriately supported with additional staff and other resources necessary to maintain the increased workload required by the new procedure.** Release of funds in a timely, efficient manner relies on the competent work of the OSG. As you are aware, OSG is currently understaffed and this change has happened at a time when it is difficult for offices to seek additional support. SGAC would like to make sure the

Department of Interior is responsibly managing the change, both internally and externally, to make sure that Self-Governance Tribes can continue to support and operate programs.

- **The Self-Governance Tribes continue to have access to accurate and timely data concerning their funding amounts.** Formerly, most of these funds have been consolidated and transferred to the Tribes in a streamlined manner and reprogramming data for each Tribe has been readily available for viewing by Tribally-authorized persons through the OSG database. Tribes must ensure that this level of information, at a minimum, is continually accessible by all Tribally-authorized persons without a lapse.

Given these and other concerns, we request that these changes be immediately placed on hold until fully explored and discussed with Self-Governance Tribal leadership and technical staff at our next Self-Governance Advisory Committee meeting in January, 2014. Any policy change with such significant impact should be fully disclosed and advanced through a partnership with the Tribes affected.

Thank you for your consideration of this request, and do not hesitate to contact me at (360) 681-4621 or email rallen@jamestowntribe.org should you have any questions or need additional information.

Sincerely,



W. Ron Allen, Chairman/CEO, Jamestown S'Klallam Tribe
Chairman, Self-Governance Advisory Committee

cc: Thomas Thompson, Deputy Assistant Secretary for Management and Budget
– Indian Affairs
Sharee Freeman, Director, Office of Self-Governance
Self-Governance Advisory Committee Members
Self-Governance Advisory Committee Technical Workgroup Members