



April 17, 2026

Mr. Jason Bruno
Deputy Assistant Secretary for Management
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Mr. Bruno,

The National Association of Tribal Historic Preservation Officers (NATHPO) appreciates the Department of the Interior's desire to strengthen the role that the Tribal Interior Budget Council (TIBC) plays in ensuring that Tribal priorities inform the budget formulation process.

NATHPO is the only national organization devoted to supporting Tribal historic preservation programs. Founded in 1998, NATHPO is a 501(c)(3) non-profit membership association of Tribal government officials who implement federal and Tribal preservation laws. NATHPO empowers Tribal preservation leaders protecting culturally important places that perpetuate Native identity, resilience, and cultural endurance. Connections to cultural heritage sustain the health and vitality of Native peoples.

Our organization has participated in several TIBC meetings and has found them to be an effective forum for highlighting opportunities and challenges for Tribal Historic Preservation Officers (THPO). TIBC has enabled NATHPO to engage in and shape DOI budget priorities, and strengthen Tribal Nations' ability to protect and preserve cultural resources and sacred places.

The National Congress of American Indians (NCAI) is the main point of contact that NATHPO has had for engaging with TIBC members and we are deeply concerned about DOI's decision not to renew the cooperative agreement that it had with NCAI since 1997. Based on our experience, NCAI was highly effective at organizing and administering TIBC meetings.

The DOI's decision to bring all TIBC meeting coordination and planning in-house at a time when the department has ongoing reorganizations and significantly reduced staffing, will undoubtedly limit the ability of Tribal Nations and organizations to effectively participate in the DOI budget process.

Besides recommending that DOI renew its cooperative agreement with NCAI, NATHPO would also recommend that DOI take these steps to strengthen TIBC:

- Formalize a co-development framework with Tribal Nations through TIBC. This should include a requirement that DOI provide written responses to TIBC recommendations, including clear justification when those recommendations are not adopted.
- Increase transparency by demonstrating how TIBC input is incorporated into annual budget submissions to Congress. This will improve accountability and build trust in the process.
- Along with Congress, invest in Tribal capacity to engage in TIBC. Many Tribal Nations face resource constraints that limit their ability to participate fully. Dedicated funding and technical assistance are necessary to ensure equitable representation.

- Finally, TIBC should prioritize base funding, program flexibility, and long-term investments that support self-governance and reduce reliance on competitive funding structures.

NATHPO encourages DOI to maintain the effective long-term partnership it has had with NCAI that has resulted in TIBC being an effective conduit for Tribal Nations and organizations to engage in the budget process. We also strongly support a thoughtful review of TIBC that would strengthen Tribal communities in general and THPOs specifically, and ultimately result in improved protection and preservation of cultural resources and sacred places.

Thank you for considering our comments. Please do not hesitate to contact us if you would like to discuss this matter or if I can be helpful in any other way.

Sincerely,



Valerie J. Grussing
Co-Executive Director



Ira L. Matt (Salish)
Co-Executive Director