

**DOI SELF-GOVERNANCE ADVISORY COMMITTEE**  
**c/o Self-Governance Communication and Education**  
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January 5, 2021

The Honorable Tara MacLean Sweeney  
Assistant Secretary – Indian Affairs  
U.S. Department of the Interior  
1849 C Street, NW  
Mail Stop 4660  
Washington, DC 20240

**Re: Program Formula Matrix Workgroup Updated Report - Submission of Phase II Recommendations**

Dear Assistant Secretary Sweeney:

On behalf of the Department of the Interior Self-Governance Advisory Committee (DOI-SGAC), we write to provide our formal recommendations on key formulas and programs under Title IV of the Indian Self-Determination and Education Assistance Act (ISDEAA). These recommendations have been developed as a result of a long-term effort and significant work conducted under a Joint Tribal/Federal Workgroup, entitled "*Program Formula Matrix Workgroup*".

Originally formed in 2011, the Workgroup developed and published a program formula matrix outlining the issues and proposed recommendations on the following:

- Identify how BIA funds are being distributed;
- Identify areas where the formulas and methodologies currently used by the BIA for distribution can be improved and provide recommendations;
- Confirm that Self Governance Tribes are being properly included in the formulas; and,
- Ensure that Self Governance Tribes are being treated equally as the rest of the Tribes.

Unfortunately, although the recommendations were supported by the Office of Self-Governance (OSG), many of the Workgroup recommendations were not acted upon or implemented within BIA.

In 2017, the DOI Office of Inspector General (OIG) published a report focused on the "*distributions of funds to Title IV Tribes, examining the accuracy of the distributions, how the Office of Self Governance maintained Tribal records, and the internal controls present.*" Several of the findings and recommendations in the OIG report correlated to many of the recommendations previously developed by the Program Formula Matrix Workgroup.

In 2018, the SGAC established the formation of a new Joint Tribal/Federal Workgroup to update the issues and recommendations included in the original program formula matrix

report. The new Workgroup divided their work into two phases<sup>1</sup> and spent significant time and resources to thoroughly engage with OSG staff and relevant BIA Program Directors to develop an updated analysis, evaluate various options and then propose recommendations for action. Phase I of the Workgroup effort was completed, and consensus was reached on the recommendations. Those Phase I recommendations were formally transmitted from this Committee to you in a previous letter dated July 13, 2020.

In September 2020, the Workgroup reached consensus and completed its analysis on Phase II and provided a draft report to the SGAC. In October 2020, the SGAC Tribal leadership held a Webinar to review the recommendations that were developed under Phase II. Based on the further input received by Tribal leaders and representatives, the SGAC is formally transmitting their final Phase II recommendations as outlined in the attached Final Report by way of this letter.

For further information, we have attached the full narrative report (which is inclusive of both Phase I and Phase II) in order to create a complete record of the detailed analysis. We strongly urge your immediate attention and action on these recommendations.

Please do not hesitate to contact me at 206-369-6699 or via email at [rallen@jamestowntribe.org](mailto:rallen@jamestowntribe.org) if you have any questions or would like to discuss this letter further. Thank you.

Sincerely,



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

cc: Sharee Freeman, Director, Office of Self-Governance  
Mark A. Cruz, DAS, Policy and Economic Development, DOI  
Jessie Young, Senior Counselor to the AS-IA -PDAS - DASPED, DOI  
SGAC, Technical Workgroup Members and DOI Self-Governance Tribes

Enclosures: Final Program Formula Matrix Workgroup Update Report (dated November 2020)  
Report Attachments

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<sup>1</sup> Phase I includes those programs which correlated to the OIG report. Phase II is other BIA programs and these recommendations are being transmitted via this letter and enclosures.