



Self-Governance Communication & Education Tribal Consortium

2312 E Admiral Blvd. • Tulsa, Oklahoma • 74110 • 918.370.4258 • www.tribalselfgov.org

May 28, 2025

Scott Davis

Exercising the delegated authority of the Assistant Secretary for Indian Affairs
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Request to Discontinue Use of ASAP for ISDEAA Fund Transfers

Mr. Davis,

On behalf of the Self-Governance Communication and Education Tribal Consortium (SGCETC), I write to respectfully request that the Department of the Interior (DOI) discontinue the use of the Automated Standard Application for Payments (ASAP) system for transferring funds authorized under the Indian Self-Determination and Education Assistance Act (ISDEAA). In its place, we urge the Department to implement a direct wire transfer process for ISDEAA agreements—consistent with the law, the terms of our agreements, and the proven practices already used by the Indian Health Service (IHS) and the U.S. Department of Transportation (DOT).

The recent addition of a justification requirement by the Department of the Treasury as a condition for drawing down ISDEAA funds through ASAP has raised concerns and highlights a broader issue: why are these funds transferred through a system intended for reimbursement when most ISDEAA agreements require an advance lump sum payment?¹

As you know, both ISDEAA and the Prompt Payment Act require that funds be transferred in a timely manner and without unnecessary bureaucratic delay. A reimbursement-based drawdown system, such as ASAP, contradicts the principle of advance payment embedded in most Self-Governance agreements. This approach, as highlighted by the new justification requirement, can also impose unilateral and unauthorized barriers on Tribal Nations that are not reflected in our ISDEAA agreements.

IHS and DOT have shown that direct wire transfers are efficient, practical, and fully compliant with ISDEAA. IHS and DOT have implemented this approach successfully, and it is one that DOI can and should adopt. Importantly, this request is not about reducing accountability. Tribes will continue to report on the use of funds as required by ISDEAA and our agreements.² Rather, direct wire transfers will increase efficiency and lawfully fulfill the terms of ISDEAA agreements.

We appreciate the Department's willingness to engage with Tribal Nations and modernize its practices to better reflect the intent of ISDEAA. We stand ready to collaborate with your office to identify opportunities that reduce administrative burdens for both Tribal Nations and the federal government.

Sincerely,

W. Ron Allen, Tribal Chairman/CEO, Jamestown S'Klallam Tribe, and
President, Board of Directors, SGCETC

¹ See, e.g., 25 USC 5329(c) (Model Agreement, Section 1(b)(6)(B)(i))

² See, e.g., 25 USC 5305(a)(2).