



November 4, 2025

The Honorable William “Billy” Kirkland III  
Assistant Secretary - Indian Affairs  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

*Sent electronically to:* [william\\_kirkland@ios.doi.gov](mailto:william_kirkland@ios.doi.gov)

**RE: Continuing the Department of the Interior’s Leadership on Implementation of the Tribal 477 Program**

Dear Assistant Secretary Kirkland:

On behalf of the undersigned members of the Coalition for Tribal Sovereignty (CTS),<sup>1</sup> we write to congratulate you on your recent confirmation to serve as Assistant Secretary for Indian Affairs at the U.S. Department of the Interior (DOI) and to acknowledge your commitment and leadership to Indian Country over your distinguished career. We request a meeting with you as soon as possible to discuss how we can work together to implement the Administration’s priorities in a manner that recognizes the sovereign government status of Tribal Nations and the United States’ longstanding trust and treaty obligations. Indian Country and the Administration share many important overlapping priorities, such as returning control to local governments, growing economies, increasing the efficiency of federal funding, and reducing bureaucratic red tape. The 477 Program accomplishes all of these goals and was made permanent via legislation in 2017—signed by President Trump—and we would like to discuss DOI’s continued support for the full implementation of Public Law 102-477, as amended (PL 102-477).

**Collaborating with Indian Country on Shared Priorities**

We look forward to working with you on shared priorities to advance Tribal sovereignty and Tribal self-determination as well as to efficiently deliver on trust and treaty obligations. As was the case when we reached out to Secretary Burgum in February,<sup>2</sup> there remain many opportunities to work together,<sup>3</sup> key among them being the full implementation of the 477 Program. CTS eagerly stands at the ready to collaborate on our shared priorities and seeks to be both a partner and a resource in your efforts to carry out the mission of DOI for the benefit of all Tribal Nations, Tribal citizens, and Tribal communities.

**Fully Implementing the 477 Program is a Clear Area of Alignment**

As you are likely aware, in 1992, Congress passed PL 102-477 creating what is commonly referred to as the 477 Program. The 477 Program was designed to allow Tribal Nations and Tribal consortia the freedom to combine funding from multiple federal programs, spread across different federal agencies, into one comprehensive, Tribally customized 477 plan with the goal to foster employment, self-sufficiency, and economic development. Once combined into a 477 plan and approved by the Secretary

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<sup>1</sup> A CTS briefing paper on the formation and messaging of CTS can be found [here](#), and more information about CTS can be found on our website [here](#).

<sup>2</sup> CTS Letter to Secretary Burgum, Re: [DOI Treatment of Tribal Nations in Implementation of Administration Priorities](#) (February 14, 2025).

<sup>3</sup> A CTS briefing paper on key shared priorities can be found [here](#).

of the Interior, funding is administered by DOI and can be consolidated and reallocated by the Tribal Nation across the services provided within the plan—allowing Tribal governments to better respond to the needs of their community. The 477 plan utilizes a single budget and reporting system, reducing overhead costs and allowing more funding to flow to direct services. Additionally, by passing PL 102-477, Congress has explicitly granted authority to waive integrated programs’ statutory, regulatory, and administrative requirements that obstruct streamlined operations.

Throughout its history, the 477 Program has enjoyed strong support from Congressional Republicans, and Congress has taken concrete steps to ensure federal agencies fully implement it, including enacting legislative clarifications, holding oversight hearings, and sending congressional letters to offending agencies. Building on these efforts, in 2017, President Trump signed into law the Indian Employment, Training and Related Services Consolidation Act,<sup>4</sup> which made the 477 Program permanent and significantly expanded the eligibility criteria for federal programs across 12 federal agencies to be integrated into 477 plans.<sup>5</sup> Now, under the current Administration, there is an opportunity to fully implement the 477 Program in a manner that provides maximum local control to Tribal Nation governments while decreasing federal government redundancies and increasing program efficiencies through the elimination of unnecessary bureaucratic red tape that frequently accompanies funding streams to state, local, and Tribal governments.

In part because the 477 Program returns maximum control to the local level and eliminates onerous record-keeping and reporting requirements, the 477 Program has produced some remarkable outcomes for Indian Country. As of last year, more than 300 Tribal Nations utilized the 477 Program to design and administer workforce development and self-sufficiency approaches that matched their community’s unique needs. The benefits from the 477 Program are some of the most impressive produced by any federal program and include:

- a 94% completion rate of the training and employment goals identified in 477 plans’ “Individual Self-Sufficiency Plans”;
- a return on investment that includes a \$9.45 per hour gain in unsubsidized employment by 477 plan participants;
- an ability to generate discretionary income through placement of funds in interest-bearing accounts;
- a reduction of government silos and more staff time spent delivering direct services; and
- a reduction in federal paperwork by up to 90%.

### **Addressing the Need to Support Full Implementation of the 477 Program**

Despite the 477 Program’s strong alignment with the Administration’s priorities and a track-record of a high return on investment of taxpayer dollars, the 477 Program currently sits at a crossroads due, in part, to federal agencies ignoring the will of Congress in favor of their own bureaucratic decision-making. Repeatedly, before and during the Biden Administration and continuing into the early months of this Administration, employees within federal agencies have fought to maintain the status quo and keep control over their programs in Washington, DC. Such actions contravene clear Congressional instructions, via PL-102-477, to place control at the local, Tribal level in alignment with federalist principles of limited government. In short, federal agencies have time and time again tried to usurp the will of Congress and impose bureaucratic barriers on Tribal Nations by refusing to fully implement the 477 Program. Agency bureaucrats, in an effort to maintain control, have continuously refused to

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<sup>4</sup> [Public Law No. 115-93](#).

<sup>5</sup> PL 102-477 sets forth three criteria that define the universe of programs eligible for integration under the 477 Program. First, the program must be operated by one of the 12 covered federal agencies. *See* 25 U.S.C. § 3404(b). Second, the program must be implemented for one of the covered purposes, which are designed to be broad so that they encompass not just employment and training programs but also related supportive services. 25 U.S.C. § 3404(a)(1)(A). Third, in order for a program to be eligible for integration into a 477 plan, it must receive a covered type of funding. 25 U.S.C. § 3404(a)(1)(B), (a)(2).

respect Tribal sovereignty and the ability of Tribal governments to take care of their own citizens and communities.

The law is not on the side of these obstructionist federal agencies. Congress has reaffirmed that DOI has *exclusive* decision-making authority over whether a program meets the eligibility criteria for integration into a 477 plan.<sup>6</sup> No other federal agency has the authority to make that decision nor to avoid transferring funds associated with a program that DOI has approved. Instead, PL 102-477 mandates funds be transferred promptly under a strict deadline. Congress intentionally put this decision-making authority in the hands of DOI, as DOI has significant expertise in applying the statutory eligibility criteria and in delivering on the United States' trust and treaty obligations, which includes fully respecting Tribal sovereignty.

The 477 Program only works when DOI fully steps into its rightful leadership role, which includes holding other agencies accountable when they do not comply with DOI's statutorily authorized determinations. DOI and Tribal Nations must work together to find a path forward that adheres to the priorities of the Administration and the will of Congress, and that respects Tribal governments and Tribal sovereignty. This path forward will require DOI to carry out its statutory obligations and exercise its authority to direct sister agencies' compliance with the mandates of PL 102-477. Doing so aligns with the Administration's limited government priorities and will allow Tribal Nations to more fully exercise their self-governance powers to grow and multiply the already significant benefits produced by the 477 Program.

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Thank you for your service to Indian Country and your leadership on these important issues. We view this communication as the first in what we hope will be a regular and productive dialogue with you and your staff. We reiterate our request to meet with you in the near future so that we may work together to ensure Indian Country's voice continues to be heard as the Administration continues to pursue its priorities.

Sincerely,

American Indian Higher Education Consortium (AIHEC)  
Affiliated Tribes of Northwest Indians (ATNI)  
Great Plains Tribal Chairmen's Association (GPTCA)  
Indian Gaming Association (IGA)  
National American Indian Housing Council (NAIHC)  
National Center for American Indian Enterprise Development (NCAIED)  
National Congress of American Indians (NCAI)  
National Indian Child Welfare Association (NICWA)  
National Indian Education Association (NIEA)  
National Indian Head Start Directors Association (NIHSDA)  
National Indian Health Board (NIHB)  
Native CDFI Network  
Midwest Alliance of Sovereign Tribes (MAST)  
Rocky Mountain Tribal Leaders Council (RMTLC)  
Seattle Indian Health Board (SIHB)  
Self-Governance Communication & Education Tribal Consortium (SGCETC)  
United South & Eastern Tribes Sovereignty Protection Fund (USET SPF)

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<sup>6</sup> [25 U.S.C. § 3407\(a\)](#).