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Larry Wright, Jr.
Ponca Tribe of Nebraska

April 16, 2026

Carmelia Strickland
Administration for Native Americans
330 C Street SW
Washington, DC 20201

via email to: anacomments@acf.hhs.gov

Dear Director Strickland,

The National Congress of American Indians (NCAI) submits these comments in response to [Federal Register Notice 2026-05484](#), dated March 20, 2026, regarding proposed changes to the Administration for Native Americans (ANA) Social and Economic Development Strategies (SEDS) program.

NCAI, founded in 1944 and based in Washington, D.C., is the oldest, largest, and most representative national organization comprised of American Indian and Alaska Native (AI/AN) Tribal governments and their citizens. NCAI advises and educates the public, state governments, and the federal government on a broad range of issues involving Tribal sovereignty, self-government, treaty rights, and policies affecting Tribal Nations. NCAI's primary focus is protecting the inherent sovereign legal rights of Tribal Nations through positions directed by consensus-based resolutions. These resolutions are promulgated at NCAI national conventions by the organization's entire membership, which is annually renewed at approximately 300 Tribal Nations.

Through resolutions and other processes, NCAI serves the broad policy interests of Tribal governments by working to promote strong Tribal and federal government-to-government policies. This includes advancing Tribal Nations' leadership in improving the health and welfare of AI/AN Tribal members throughout the country.

Failure to Adequately Conduct Tribal Consultation

The ANA plays a critical role in advancing Tribal self-determination by supporting community-driven economic development, governance capacity, and cultural sustainability. The proposed elimination of the SEDS program and its replacement with a new framework represents a significant policy shift with substantial implications for Tribal Nations. Such changes warrant formal, government-to-government Tribal consultation, not solely notice-and-comment



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rulemaking. NCAI is concerned that the process outlined in the notice does not reflect meaningful Tribal consultation consistent with the U.S. Department of Health and Human Services (HHS) Tribal Consultation Policy, Executive Order 13175, and the federal trust responsibility.

While this Federal Register notice invites public comment, it is not a substitute for government-to-government consultation. The absence of Tribal Leader Letters, consultation sessions, and publicly available summaries of Tribal input demonstrates that Tribal Nations were not meaningfully engaged prior to the development of these proposals.

We respectfully urge the HHS to pause implementation of these changes until formal Tribal consultation is conducted in accordance with the HHS Tribal Consultation Policy.

Importance of SEDS and Concerns with Replacement

The SEDS program has long been one of the most effective federal investments in Tribal self-determination and economic sovereignty. SEDS funding is unique in its flexibility, allowing Tribal Nations and Native organizations to define priorities and design projects based on locally identified needs.

Eliminating the SEDS program risks losing a proven, community-driven model that has supported thousands of successful projects across Indian Country. Its broad eligibility and adaptability are essential to meeting the diverse needs of Tribal communities and provides a critical mechanism for the federal government to meet its trust and treaty obligations.

Concerns Regarding the Undefined EAGLE Framework

In addition to concerns about the lack of consultation, NCAI is troubled that the proposed Economic Advancement Grants for Local Empowerment (EAGLE) program remains insufficiently defined in the notice.

The notice indicates that the EAGLE will replace the SEDS and SEDS-Alaska; however, it does not provide sufficient detail regarding:

- Eligible activities and allowable project scope;
- Funding levels and award structures;
- Evaluation criteria and performance expectations; and
- Degree of flexibility afforded to Tribal applicants.

Moving to eliminate a longstanding, successful program in favor of a new and undefined framework imposes uncertainty on Tribal Nations, disrupts long-term planning, and may deter participation — particularly for smaller or under-resourced Tribal communities.



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Without clear parameters, it is difficult for Tribal Nations to assess whether the EAGLE program will preserve the core strengths of the SEDS program, including flexibility, community-driven design, and cultural responsiveness.

NCAI strongly recommends that the ANA fully define and publicly vet the EAGLE framework through Tribal consultation before moving forward with any transition.

Recommendations to Strengthen — Not Replace — the SEDS Program

Rather than eliminating the SEDS program, we strongly recommend that Administration for Native Americans:

- Engage in collaborative and meaningful consultation in accordance with the HHS Tribal Consultation Policy, Executive Order 13175, and the federal trust responsibility;
- Retain the SEDS program as a core funding stream alongside any new initiatives;
- Fully define the EAGLE program and subject it to Tribal consultation prior to implementation;
- Ensure maximum flexibility in all Tribal funding structures;
- Provide clear transition guidance and technical assistance to applicants; and
- Maintain support for cultural, governance, and community priorities — not solely economic outputs.

Comments on Proposed Programmatic Changes

NCAI supports continued investments in economic development, workforce training, and infrastructure. However, NCAI cautions that:

- Prescriptive project categories may not reflect diverse Tribal priorities;
- Increased administrative requirements without additional resources may create barriers; and
- Consolidated technical assistance must ensure equitable and accessible support.

Upholding Tribal Self-Determination

The ANA's mission is grounded in self-determination. This requires supporting Tribal-designed solutions, not replacing flexible models with undefined or potentially restrictive frameworks.

We urge the HHS to ensure that any policy updates strengthen, not limit, the ability of Tribal Nations to determine their own economic and social futures.

The SEDS program represents a cornerstone of federal support for Tribal self-determination. Replacing it with an undefined program, absent meaningful and mandated Tribal consultation, raises significant concerns.



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We respectfully request that HHS pause implementation of the proposed rule changes, conduct formal Tribal consultation, and work collaboratively with Tribal Nations to ensure any program changes build upon the success of the SEDS program.

We appreciate your consideration and look forward to continued engagement.

Respectfully,

A handwritten signature in black ink, reading "Larry Wright, Jr." in a cursive script.

Larry Wright, Jr.
Executive Director
National Congress of American Indians