



**NATIONAL ASSOCIATION  
OF TRIBAL HISTORIC  
PRESERVATION OFFICERS**

P.O. BOX 19189  
WASHINGTON, D.C. 20036-9189  
(202) 628-8476  
INFO@NATHPO.ORG  
WWW.NATHPO.ORG

April 12, 2024

Bryan Newland  
Assistant Secretary for Indian Affairs  
Department of the Interior  
1849 C St NW  
Washington, DC 20240

Dear Assistant Secretary Newland,

The National Association of Tribal Historic Preservation Officers (NATHPO) has the following comments regarding the U.S. Department of the Interior's (Department) Federal Indian Boarding School Initiative (Initiative).

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.

NATHPO appreciates the Department's commitment to addressing the troubled history of Federal Indian boarding school policies and their legacy for Indigenous Peoples. For far too long, our Nation chose to ignore this dark chapter and its impact on Tribal Nations. NATHPO strongly supports the Department's acknowledgement of what happened and its support for the National Native American Boarding School Healing Coalition's work to gather first-person survivor narratives.

Moving forward, the National Park Service's (NPS) plan for the preservation and interpretation of places associated with the Federal Indian boarding school system should recognize Tribal Historic Preservation Officers' (THPOs) knowledge and experience. A significant role for THPOs in the process would both empower Tribal Nations and serve as an acknowledgement of Tribal Sovereignty.

The Department has specifically sought the answer to questions regarding how Federal Indian boarding school system resources in National Parks should be acknowledged, and how it should protect the physical sites of historical Federal Indian boarding schools that are currently located on Federal lands. It has also asked how NPS' historic preservation programs can support the Federal Indian Boarding School Initiative. The answer to all of these questions is that the story of Federal Indian Boarding Schools must be told by Tribal Nations, not the NPS. The NPS has a valuable role to play in supporting Tribal Nations, but for there to be spiritual and emotional healing, Tribal Nations must be the ones telling their stories.

Placing THPOs front and center in the work is a natural fit because of the existing relationship that the NPS has with THPOs. THPOs were created by the National Historic Preservation Act (NHPA) and receive funding from the Historic Preservation Fund (HPF), both of which are under the jurisdiction of the NPS.

While it is important that THPOs lead the process to preserve and interpret places associated with the Federal Indian boarding school system, it would be an injustice if they were not properly compensated by the federal government for taking on this responsibility. Tribal members in general and THPOs specifically should not be expected to volunteer their time to tell the story of the federal government's decades long effort to extinguish their culture.

**PROTECTING NATIVE PLACES**

Part of the effort to make sure Tribal Nations have the resources they need to tell this story should include a significant increase in the funding that THPOs receive through the HPF. With the current total of NPS recognized THPOs at 222, the \$23 million that was appropriated for THPOs in Fiscal Year 2024 averages out to about \$104,000 per THPO. This is not enough to do the thousands of consultations that are delegated to THPOs in the NHPA and certainly is not enough to pay for additional tasks.

Besides making budget requests that increase THPO funding in the HPF, the NPS should also request specific funding to provide THPO staff working on preserving and contextualizing the story of Federal Indian Boarding Schools with emotional and spiritual support.

During the Department listening sessions on NPS engagement on the Federal Boarding School Initiative, I appreciated hearing Deputy Assistant Secretary for Indian Affairs Kathryn Isom-Clause say that she and others in the Department want to “Make sure we do not cause additional pain.” She clearly understands the psychological burden that comes with doing this work.

Finally, I would urge the Department to focus on more than the tangible sites associated with the Federal Indian boarding school policies and their legacy. Focusing solely on the physical sites fails to fully understand Tribal Nations’ broader understanding of cultural resources.

NATHPO appreciates the work that the Department has already done and looks forward to engaging with the Department as it takes on this important and difficult work.

Sincerely,

A handwritten signature in black ink that reads "Valerie J. Grussing". The signature is written in a cursive, flowing style.

Valerie J. Grussing, PhD  
Executive Director