



Via Email

October 23, 2025

The Honorable Senator Crapo, Chair Senate Committee on Finance Washington, D.C. 20510

The Honorable Congressman Hill, Chair House Committee on Financial Services Washington, D.C. 20515

The Honorable Senator Wyden, Ranking Member Senate Committee on Finance Washington, D.C. 20510

The Honorable Congresswoman Waters, Ranking Member House Committee on Financial Services Washington, D.C. 20515

Re: Support for continuation of the SSBCI Program for Tribal Nations and current deadlines

Dear Honorable Members,

On behalf of NAFOA's Board of Directors and our 185 Member Tribes across the Country, we express our concern for the State Small Business Credit Initiative (SSBCI) program and the Administration's proposal to move up the Tribal expenditures deadline from October 2026 to November of this year. Congress created the State Small Business Credit Initiative (SSBCI) to strengthen small business lending and investment, including in Indian Country, and this change in expenditure date is a significant shift in program expectations. It could have severe consequences for Tribal governments and Native-owned businesses.

As you know, the SSBCI is a federal program administered by the U.S. Department of the Treasury that provides capital to states, territories, and Tribal governments to expand access to financing for small businesses. Initially established in 2010 following the financial crisis, the program was later reauthorized and developed under the American Rescue Plan Act of 2021, which allocated \$500 million to Tribal governments. Regarding these allocations, the Treasury does not make loans directly; instead, participating governments design programs and work with banks, credit unions, and Native Community Development Financial Institutions (CDFIs) to leverage private capital and expand access to small business financing.

Tribes have been able to use SSBCI funds to support eligible small business financing in any eligible manner they choose. This includes assisting small businesses on Tribal lands, small businesses located in states where Tribal lands or Tribal members reside, and small businesses

owned by Tribal members throughout the United States. Most Tribes received their first SSBCI tranche in the fall of 2023, establishing a three-year statutory window — through the fall of 2026 — to deploy at least 80% of those funds before requesting subsequent allocations. Nationally, many Tribal programs are still in the early stages of implementation, with average expenditures between 20-30% of their first tranche as they develop lending infrastructure and small business pipelines.

We therefore respectfully request your support to urge the Treasury to:

- 1. Maintain the full statutory expenditure timeline for Tribal governments.
- 2. Ensure SSBCI allocations remain fully available for deployment to Native borrowers and Tribally owned businesses; and
- 3. Continue to support technical assistance and program flexibility to help Tribes achieve meaningful and sustainable economic outcomes.

The SSBCI program is among the most significant capital access programs ever available to Indian Country. If the Treasury expedites the deadline and recaptures funds prematurely, it would significantly jeopardize Tribal governments, Native CDFIs, and Tribal businesses that are only just developing their lending infrastructure. This premature action by Treasury would not only hinder the progress of small business development in Indian Country but also withhold crucial capital, thereby resulting in a missed opportunity for Native entrepreneurs. Protecting and fully implementing it will help Tribal Nations advance entrepreneurship, job creation, and economic self-determination.

Attached is a summary document that provides an overview of the NAFOA Member Tribes and their SSBCI funding by State. We have also provided a document that outlines all Tribal SSBCI funding for Tribal Nations, including those that are not currently Member Tribes of NAFOA. You will see from the documents that the potential impact for Tribal Nations and the surrounding communities of rural America is significant. NAFOA is prepared to serve as a resource should your offices have any questions or requests for information.

Respectfully,

Chairman Rodney Butler, NAFOA President

Mashantucket Pequot Tribal Nation