



To: Chuck Hoskin Jr., Principal Chief

From: Registration Code and Process Reform Task Force

Date: January 08, 2026

Re: Registration Code and Process Reform Task Force Report II

Chief Hoskin,

The Principal Chief's Task Force on Registration Code and Process Reform ("Task Force") submits Report II with the following recommended reforms to Cherokee Nation's citizenship code, registration processes and improvements to photo ID technology, established in Executive Order 2024-08-CTH. In our work, we provided recommendations that can lead to a more secure, inclusive, and accessible registration experience. Our recommendations are grounded in the principle that Cherokee Nation's citizenship services should be efficient, equitable, and reflective of the Cherokee Nation's sovereign identity and commitment to all citizens.

On behalf of my colleagues and members of this Task Force, we appreciate the opportunity to continue to review and inform on topics related to citizenship and registration. It is the intention of this group to not only strengthen the Cherokee Nation's registration code but also reinforce our commitment to upholding the rights and dignity of all citizens, ensuring that the citizenship process remains transparent, equitable, and reflective of Cherokee values.

Wado,

Shella Bowlin
Cherokee Nation Secretary of State
Chair, Registration Code and Process Reform Task Force



GWY.Ø DBP
CHEROKEE NATION®

**Task Force on
Registration Code and Process Reform**

Report II

January 08, 2026

Table of Contents

Introduction	4
Executive Summary	6
Recommendations	7
Threshold Assessment of the Fiscal Impact	13
Conclusion	16
Glossary.....	17

Introduction

The Principal Chief's Task Force on Registration Code and Process Reform ("Task Force") was established on December 6, 2024, by [Executive Order 2024-08-CTH](#), to examine and recommend necessary reforms to the Cherokee Nation Citizenship Code and associated registration processes.

The Task Force includes the following members:

Position	Name
Secretary of State (chair)	Shella Bowlin
Deputy Secretary of State (co-chair)	Canaan Duncan
Chief of Staff (member)	Dr. Corey Bunch
Cherokee Nation Registrar (member)	Derrick Vann
Attorney General (member)	Chad Harsha
Delegate to Congress and Executive Director of Government Relations (member)	Kim Teehee
Chief Information Officer (member)	Paula Starr

Pursuant to Executive Order 2024-08-CTH, the Task Force was assigned two primary objectives:

The first objective is [Task Force Report I](#) submitted on March 03, 2025, to recommend reforms to the following subject areas of the Cherokee Nation Citizenship Code and/or the Registration processes, specific to:

- Role of the Registration Committee
- Relinquishment Process
- Post-relinquishment period process
- Dual enrollment/citizenship
- Alignment of Registration process with the Executive Order on Equality and the Principal Chief's directive of June 10, 2024, to remove barriers to access to members of the 2SLGBTQ+ community
- Recommendations as to whether the Registration should adopt a comprehensive set of policies governing citizenship, photo ID and CDIB processing
- Any other statutory or process reforms recommended by the Task Force (other than subjects to be addressed in part II)

Additional time was requested and approved to provide a recommendation addressing dual citizenship. Under the section of this report titled, "other statutory or process reforms," the development of a revocation process was added as a recommendation. Both recommendations are included in Task Force Report II.

Objective two is addressed in Task Force Report II and provides recommendations as to the photo ID, more specifically examining:

- “Enhanced Tribal ID” in coordination with the U.S. Customs and Border Patrol
- Security/ data storage features embedded in IDs
- Clarity of relevance of REAL ID to photo IDs
- Digitization as to all or parts of the citizenship/CDIB/Cherokee Nation photo ID application process

In examining potential photo ID improvements, the Task Force should conduct at least a threshold assessment of the fiscal impact of recommended changes.

Executive Summary

To ensure efficient and effective governance, the Cherokee Nation (CN) must comply with its legal authority, national interests, and equitable practices in administering citizenship processes. A comprehensive review reveals that while processes have evolved, the Registrar operates under a single policy from the Bureau of Indian Affairs (BIA).

In response to Executive Order 2024-08-CTH, the Task Force on Registration Code and Process Reform examined the following areas of the Cherokee Nation Registration Code and processes, making the following recommendations:

Task Force Report I Objectives

Dual Citizenship: Disallow dual enrollment outside of those specifically included in the Cherokee Nation Constitution, Statutes and Treaties, namely the Delaware Cherokee and Shawnee Cherokee.

Other Statutory or Process Reforms:

Revocation: Develop a policy to address revocation of citizenship and Certificate of Degree of Indian Blood.

Clarification – Report I listed Digitization of the citizenship application process to be addressed in Report II, that was a typo, and it was addressed in Report I.

Task Force Report II

Enhanced Tribal ID in Coordination with U.S. Customs and Border Protection

The Task Force recommends that by **March 1, 2026**, Cherokee Nation initiate communication to pursue development of an Enhanced Tribal Card (ETC) in coordination with U.S. Customs and Border Protection. A standard CN Photo ID should remain available as an alternative for citizens who do not require ETC-level credentials.

Security/ Data Storage Features Embedded in IDs

The current CN Photo ID, unchanged for more than a decade, requires updating to ensure broader utility and security due to limitations of the current software and hardware. By **May 1, 2026**, the Task Force recommends that the Registrar provide a summarized plan addressing the following items:

- CN Photo ID software and hardware updates
- CN Photo ID redesigned to include expiration date, veteran status, expanded markers, and the citizen's Cherokee name
- CN Photo ID infrastructure prepared for future upgrades and up-to-date security protection

Clarity of Relevance of REAL ID to Photo IDs

The Task Force emphasizes the importance of public clarity around usage and limitations of the Cherokee Nation Photo ID. Although the CN Photo ID is not, and will not become, a REAL ID, enhancements such as an expiration date can help align it with current security expectations. Furthermore, the development of an ETC program provides additional ID options for CN citizens.

Digitization as to all or Parts of the Citizenship/ CDIB/ Photo ID Application Process

By **August 1, 2026**, the Task Force recommends digitization of the citizenship/CDIB application process.

By **January 1, 2027**, the photo ID renewal process should also be available online.

Recommendations

Task Force Report I

Dual Citizenship

Cherokee Nation will always honor the Cherokee Nation Constitution and Treaties as it relates to citizenship where the Delaware Cherokees and Shawnee Cherokees are allowed dual citizenship. The Task Force feels there are inherent threats continuing to allow dual citizenship outside of Delaware and Shawnee Cherokees.

The Task Force discussed recent actions in the years of 2024 and 2025 taken by the United Keetoowah Band (UKB), who are aggressively pursuing rogue policing and economic development opportunities within the Cherokee Nation Reservation where federal law was overturned to allow UKB to place land into trust to reopen a casino. As recently as October 2025, the CN Registrar was informed that UKB Registration will no longer verify citizenship for our services and will not verify citizenship for CN Marshal Service for a citizen case. At the current time, UKB only allows “exclusive” membership in its Tribe. It is critical that Cherokee Nation do its part to protect our Reservation, tribal sovereignty and treaty rights and minimize risks by eliminating dual citizenship with UKB.

In addition, the Task Force finds that by allowing dual citizenship, Cherokee Nation is vulnerable to the exploitation of federal and Tribal programs by citizens who strategically manipulate dual citizenship, a key reason many Tribes do not allow dual citizenship. Although evidence does not appear to be abundant, it is not easy to track as Tribes do not share information to help identify such practices.

For these reasons stated above, the Task Force recommends that the Registrar Policy only allows singular citizenship outside of Delaware and Shawnee Cherokees. Requiring singular citizenship would further ensure protection of our resources and communities.

Other Statutory or Process Reforms Not Addressed

Revocation Process

Task Force Report I identified that the revocation process be reviewed, and recommendations provided within Task Force Report II.

The Task Force found that during the period of 2011 to 2019 Cherokee Nation’s Registration Department undertook a so-called “audit” of citizenship records to determine whether any citizens lacked a sufficient factual basis for citizenship due to fraud or mistake in the submission or review of records. Citizens deemed to have no legitimate basis for citizenship were notified that their descendants would be ineligible for citizenship but, because Cherokee Nation lacks a law or policy allowing for the revocation of citizenship, the flagged citizens retained citizenship. The audit was conducted by a contractor, but it is unclear what policies, rules, or procedures were followed. There does not appear to have been a process in place for a citizen deemed illegitimate to have the determination reviewed. Accordingly, the Task Force recommends further review of this process, whether the process was guided by appropriate policies, rules and procedures, whether the practices associated with this process arguably denied impacted citizens their due process, and

how, prospectively, Registration should audit citizenship records and, ultimately, under what circumstances and under what legal authority Cherokee Nation may revoke citizenship.

As for revocation itself, the Task Force finds that Cherokee Nation does not have a citizenship revocation policy and does not appear to have an express statutory basis for such a policy. It is recommended that such statutory basis be enacted and a policy be created.

The Task Force recommends that, whether by fraud or mistake, individuals who acquired citizenship on an illegitimate basis should face revocation proceedings. Just as the process for flagging citizens as having an illegitimate basis for citizenship should be the product of a transparent policy that protects due process, the revocation process itself should be based in transparent, written, law and policy which affords the subject individual due process and an opportunity to have a determination reviewed.

The Task Force identified several areas of focus for Cherokee Nation leadership if it considers a revocation code and policy:

- Revocation of illegitimate citizenship obtained by fraud or mistake
- Security – protect Cherokee Nation and its citizens security by removing individuals who may pose a threat or have affiliations that could compromise our best interests
- Addressing Misrepresentation – if an individual obtains citizenship through false information or concealment, revocation can ensure that only truthful individuals hold citizenship
- Compliance – ensure compliance with citizenship standards and CDIB standards
- Good Governance – having a clear process for revocation of citizenship can prevent misuse of citizenship status

The Revocation Policy is essential to maintain integrity and security of our citizenship governance and legal system.

Task Force Report II

Enhanced Tribal ID in Coordination with U.S. Customs and Border Protection

By **March 1, 2026**, the Task Force recommends that Cherokee Nation initiate communication with U.S. Customs and Border Protection (CBP) for the purpose of establishing a formal agreement through a Memorandum of Agreement (MOA) to pursue an Enhanced Tribal Card (ETC).

ETCs meet the standards of the Western Hemisphere Travel Initiative (WHTI) and allow tribal citizens to use a tribal-issued ID for international land and sea travel as well as federal facility access. ETC provides a high-security form of identification to serve as an alternative to state-issued REAL ID. Standard photo IDs should remain available, offering citizens flexibility in choosing the document that best meets their needs.

Since first piloted by the Pascua Yaqui Tribe of Arizona in 2010, seventeen federally recognized tribes across the United States, including three Oklahoma tribes, have adopted the ETC program, each tailoring their participation to their unique geographic, cultural, and political needs. The reasons for issuing ETCs vary by region, reflecting assertion of tribal sovereignty, tribal ID modernization, and meeting travel needs of tribal citizens in an affordable manner.

Participation in an ETC program requires a MOA with CBP and a projected three-year development/implementation period. Costs associated with ETC issuance include ETC Program staff, secure ETC Program operating space, laser printing systems, software, and maintenance.

Security/Data Storage Features Embedded in IDs

To support strategic planning and modernization efforts, the Task Force recommends that the Registrar submit a summarized implementation plan by **May 1, 2026**. This plan should address the following key areas:

- CN Photo ID software and hardware updates
- CN Photo ID redesigned to include expiration date, veteran status, expanded markers, and the citizen's Cherokee name
- CN Photo ID infrastructure prepared for future upgrades and up-to-date security protection

Following the submitted summarized implementation plan due on May 1, 2026, the Task Force recommends a comprehensive upgrade to the CN Photo ID, including:

- Implementation of new ID software allowing the following:
 - Revised ID card design with:
 - Expiration date
 - Veteran status marker
 - Expanded gender markers
 - Citizen's Cherokee name
 - Cherokee Speaker status marker
 - Cherokee name (if applicable)
 - Extendable platform to support data storage and improved security features
- Acquisition of new hardware
 - Software compatible cameras
 - Updated signature pads

In evaluation of the current Cherokee Nation registration databases and software, the citizenship database is technically sound, secure, and capable of supporting the recommended digital expansions. No replacement is required currently.

These updates are consistent with identity verification protocols currently used by state and federal agencies.

Clarity of Relevance of the REAL ID to Photo IDs

Currently, the CN Photo ID is non-expiring. The indefinite valid period has been known to create unnecessary scrutiny for CN citizens using the Photo ID for local and official business, even more-so with the 2025 deadline of the REAL ID Act. Passed by Congress in 2005, the REAL ID Act sets federal security standards for the issuance of state-issued driver's licenses and ID cards. As of May 7, 2025, U.S. citizens must present a REAL ID or another form of acceptable form of ID boarding domestic commercial flights, entering federal buildings, and accessing nuclear facilities.

The REAL ID helps federal officials verify identities more efficiently in high-security environments, contributing to a safer environment for travelers, federal employees, and visitors to federal facilities by setting the minimum-security standards for state-issued IDs. The Task Force recommends the following updates to the CN Photo ID:

- An expiration date
- Optional identity markers such as veteran status, Cherokee name, and expanded gender designations

The ETC provides an ID option that meets federal access requirements for domestic travel and entry into federal buildings. An ETC would establish a federally recognized ID format incorporating enhanced security features in compliance with CBP guidelines. Through its scan technology and partnered issuance with CBP, the ETC provides the highest level of ID security beyond Cherokee Nation use. Offering multiple ID formats allows Cherokee Nation to meet varying identification needs among its citizen population.

ID Comparison Overview

	State Issued REAL ID	CN Photo ID <i>Improved CN Photo ID</i>	ETC	US Passport
Locations Accepted				
	<i>Airports within the United States through TSA</i>	✓	with Secondary ID ✓	✓
	<i>Access to Federal Buildings</i>	✓	No <i>No</i>	✓
	<i>North America Land and Sea port access</i>	No	No <i>No</i>	✓
	<i>Local and State Voting Polls</i>	✓	✓	✓
	<i>Receive Cherokee Nation Tribal Services</i>	No	✓ ✓	No
Information Printed on ID				
	<i>Full name</i>	✓	✓ ✓	✓
	<i>Cherokee Name</i>	No	No	✓
				No

		✓		
<i>Date of Birth</i>	✓	✓ ✓	✓	✓
<i>Address</i>	✓	✓ ✓	✓	✓
<i>Cherokee Nation Citizenship Registry Number</i>	N/A	✓ ✓	✓	No
<i>Veteran Status Marker</i>	✓	No ✓	✓	No
<i>Cherokee Speaker Status Marker</i>	No	No ✓	✓	No
<i>Expanded Gender Marker Option</i>	No	No ✓	Unknown	No

Card Expiration Periods & Costs

	<i>Card Expiration</i>	4 years OR 8 years	N/A 8 years	8 years	10 years for adults, 5 years for minors
	<i>Citizen Cost</i>	\$40 OR \$80	No cost, \$5 replacement fee No cost, \$10 replacement fee	\$30, \$30 replacement fee	\$100- \$130 for a passport book \$15- \$30 for a passport card

Digitization of Citizenship/ CDIB/ Photo ID application process

By **August 1, 2026**, the Task Force recommends digitization of the citizenship/CDIB application process.

By **January 1, 2027**, the photo ID renewal process should also be available online.

Review of the processes of citizenship, CDIB and photo ID reveal opportunities for improvements. The Task Force recommends changes to CN Registration processes to improve accessibility, clarity, and efficiency for all citizens. These reforms aim to reduce barriers created by outdated systems, ensure inclusivity for all, and leverage technology to streamline services. These changes reflect a broader commitment to equitable access and a more responsive, citizen-focused registration system.

Furthermore, in alignment with Task Force Report I, by **December 7, 2026**, it is recommended to develop an updated set of operational policies and procedures for the Registration Department, pertaining to newly

established citizenship/CDIB and Photo ID processes. These sections should also ensure alignment with Executive Order 2020-05-CTH on Equality.

Citizenship/CDIB Process

By **August 1, 2026**, the Task Force's recommendation is that the Registrar will update the Citizenship Application process to achieve greater clarity and provide an online application for those not available to complete the process in person. Reform recommendations are:

- Launching a secure online citizenship/ CDIB application including:
 - Application status updates
 - Access to electronic communication with Registration staff
- Revised application materials to provide clarity on the citizenship/CDIB process
- Expanding inclusivity in form instructions for:
 - 2SLGBTQ+ citizens
 - Adopted Cherokee children
 - Freedmen Descendants

As a part of this recommendation, the Task Force recommends a strategic communications plan coordinated by the CN Communications Department, CN Government Relations and the Registrar, the plan should aim to support citizen awareness and understanding of the recommended changes. Key components include:

- Clear, accessible instructional content and FAQs regarding the Citizenship Application process
- Public education via social media, videos, and outreach regarding the Citizenship Application process
- Social Media outreach

Materials should be accessible, culturally relevant, and tailored to address the unique needs of all in the registration process.

Photo ID Process

By **January 1, 2027**: The Task Force recommends streamlining the renewal process for CN Photo IDs. Though new photo IDs will still be processed in person, renewals can be provided through the Gadugi portal.

The current Cherokee Nation Photo ID application and renewal process requires all applicants to appear in person for the collection of a photo and signature. We recommend reforming the Photo ID process that balances security, citizen convenience, and technological feasibility. The Cherokee Nation already retains digital images and signatures from in-person applications. Most Photo ID renewals do not require updated new biometric data. Online renewal features include:

- Login-based access through the Gadugi Portal
- Automatic population of existing photo and signature data

- Secure document upload system
- Secure payment processing for any applicable fees
- Mailing of renewed Photo ID

As a part of this recommendation, the Task Force recommends a strategic communications plan coordinated by the CN Communications Department, CN Government Relations and the Registrar, the plan should aim to support citizen awareness and understanding of the recommended changes. Key components include:

- Clear, accessible instructional content and FAQs regarding the CN Photo ID renewal process and the improved Cherokee Nation Photo ID
- Public education via social media, videos, and outreach regarding the online CN Photo ID renewal process and the improved Cherokee Nation Photo ID
- Social Media outreach

Materials should be accessible, culturally relevant, and tailored to address the unique needs of all in the registration process.

Threshold Assessment of the Fiscal Impact

To improve CN's Registration processes, the Task Force proposes a three-pronged reform strategy prioritizing data security, system efficiency, and equitable access for all.

1. Development of online Registration processes
2. Redesign of the CN Photo ID
3. Implementation of the ETC program

Project 1: Online CN Citizenship/ CDIB and Photo ID renewal process

An online process will centralize Registration services, offering a secure, user-friendly interface for citizenship/CDIB applications, photo ID renewals, and updates. The process will integrate into existing infrastructure and will be developed internally. Developed through internal IT resources, only minimal network costs may incur.

Project 2: Improved Cherokee Nation Photo ID

This project involves redesigning the existing Cherokee Nation Photo ID and replacing software and hardware. No additional replacement of software is needed, as the current citizenship database is stable and capable of supporting the improvements to the CN Photo ID.

Estimated card cost: \$1.76, an increase from \$1.23. See chart below.

Major Components:

ID Software Upgrade Costs	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Perpetual Software License (6 QTY)	\$10,758	\$ -	\$ -	\$ -	\$ -	\$ -
Annual Software Support (6 QTY)	\$3,420	\$3,420	\$3,420	\$3,420	\$3,420	\$3,420
Training, Installation, Tech Support (6 QTY)	\$3,600	\$ -	\$ -	\$ -	\$ -	\$ -
Hardware-Cameras, Signature pads						
Hardware-Cameras, Signature Pads (5 QTY)	\$5,150	\$ -	\$ -	\$ -	\$ -	\$5,150
Supplies-Cards, Lamineate, Printing Ribbon	\$31,782	\$31,782	\$31,782	\$31,782	\$31,782	\$31,782
Total Estimate	\$54,710	\$35,202	\$35,202	\$35,202	\$35,202	\$40,352

Project 3: Development of an ETC program

The ETC provides a secure, federally recognized ID solution that meets heightened federal standards. Its design incorporates laser engraving, machine-readable zones, and robust software. Estimated per-card material cost: \$13.75

Five-Year Implementation Costs:

ETC Implementation Costs	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Laser Printing System (3 QTY) *	\$191,100	\$ -	\$ -	\$ -	\$ -	\$ -
License Package (3 QTY) * <i>One time license per serial number</i>	\$22,750	\$ -	\$ -	\$ -	\$ -	\$ -
Card Software and Design*	\$47,127	\$ -	\$ -	\$ -	\$ -	\$ -
Training, Installation, Tech Support*	\$12,444	\$12,444	\$12,444	\$12,444	\$12,444	\$12,444
Travel and Accommodations Estimate *	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000	\$20,000
Card Materials, Postage, and Hardware (~4,000 cards) ***	\$55,000	\$55,000	\$55,000	\$55,000	\$55,000	\$55,000
Registration Department Staff and Space Expansion**	\$345,000	\$210,000	\$210,000	\$210,000	\$210,000	\$210,000
Equipment Maintenance and Technology and Upgrades	\$ -	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Total Estimate	\$693,421	\$302,444	\$302,444	\$302,444	\$302,444	\$302,444

Prices can fluctuate based on final card design

*Costs provided by vendor

**Costs provided by internal Cherokee Nation Departments

***Based upon information provided by tribal nations currently issuing ETCs

Conclusion

The Task Force recommends code and policy allowing only singular citizenship outside of Delaware and Shawnee Cherokees, and that individuals who acquired citizenship on an illegitimate basis should face revocation proceedings.

The Task Force recommends a strategic modernization of the CN Registration Departmental processes and systems, grounded in evaluation, digital transformation, tribal sovereignty, and citizen access. This includes:

- Evaluation for improvement of processes affecting dual citizenship and revocation
- Development of a centralized, accessible online Registration system
- Redesign and upgrade of the CN Photo ID
- Implementation of an ETC program

Collectively, these reforms position the Cherokee Nation to better serve its citizens through secure, efficient, and inclusive services while asserting tribal sovereignty through the Registration process. The Task Force urges implementation of these reforms, with full deployment.

Glossary

Cherokee Nation citizenship card: Commonly referred to as “**Blue Card**,” printed on blue paper. It confirms that the holder is a citizen of the Cherokee Nation.

Certificate Degree of Indian Blood (CDIB): Commonly referred to as “**White Card**,” an official document issued by the Bureau of Indian Affairs through the Cherokee Nation that certifies an individual’s percentage of Native American ancestry based on descent from a person listed on the Dawes Rolls. Required for tribal enrollment.

Cherokee Nation Citizenship: Legal recognition as a tribal citizen, granted by the Cherokee Nation based on lineal descent from an individual listed on the Dawes Rolls and submission of required documentation.

Cherokee Nation Citizenship Application: The formal paperwork required to request enrollment in the Cherokee Nation. Applicants must provide proof of lineal descent from a Dawes Roll enrollee.

Cherokee Nation Photo ID: A tribal-issued identification card proving citizenship in the Cherokee Nation. It includes the citizen's name, registration number, photo, and date of issue. It is not a federally recognized travel document.

Customs & Border Protection (CBP): A federal agency under the U.S. Department of Homeland Security responsible for securing the nation’s borders. CBP enforces immigration and customs laws, inspects travelers and goods entering the U.S., and works with tribes on programs like Enhanced Tribal Cards (ETCs).

“Dawes Rolls”: A federal census created between 1898–1906 listing individuals eligible for land allotments in the Five Civilized Tribes (including the Cherokee Nation). Cherokee Nation citizenship is based on descent from someone listed on these rolls.

Dual Citizenship: Holding citizenship in two tribes.

Enhanced Tribal Card (ETC): A secure, federally approved photo ID issued by certain U.S. tribes that complies with the Western Hemisphere Travel Initiative (WHTI). It allows land and sea travel between the U.S., Canada, Mexico, and the Caribbean.

REAL ID: A federal standard for state-issued driver’s licenses and ID cards that meet enhanced security guidelines.

Relinquishment: The formal process of giving up tribal citizenship.

State Driver’s License: An official card issued by a U.S. state government that permits an individual to legally operate a motor vehicle. It also serves as a widely accepted form of photo identification.

State ID Card: A government-issued photo ID provided by a U.S. state to individuals who do not drive. It verifies a person’s identity, age, and residency, and is commonly used for activities like banking or voting.

Improved Cherokee Nation Photo ID: A newer version of the tribal photo ID issued by the Cherokee Nation that may include updated security features, formatting, or branding. It serves the same function as the original: proof of Cherokee citizenship.

Western Hemisphere Travel Initiative (WHTI): A U.S. law requiring travelers to present specific IDs when entering the U.S. by land or sea from Canada, Mexico, and the Caribbean. Enhanced Tribal Cards, U.S. Passports, and Passport Cards are WHTI-compliant.