



May 10, 2016

Lawrence S. Roberts, Acting Assistant Secretary – Indian Affairs
Office of the Assistant Secretary – Indian Affairs
ATTN: CSC Comments
1849 C Street, NW, MS-3071-MIB
Washington, DC 20240

Dear Acting Assistant Secretary Roberts:

Thank you for inviting input on the draft Department of Interior/Bureau of Indian Affairs Contract Support Costs Policy (Draft Policy). Following are comments offered by Chugachmiut, the tribal non-profit consortium created to promote self-determination for the seven member tribes of the Chugachmiut service area. Chugachmiut has a forty-two year history of providing health, social services, education & training, and technical assistance to the Chugach Native people in way that is acceptable to Native cultural values and traditions in order to enhance the well-being of the people residing in the region.

Dominant among Chugachmiut's work is a self-determination component. Through these efforts, one Federally recognized tribe and one tribal entity have assumed and successfully administer 100% of their share of Department of Interior/Bureau of Indian Affairs (DOI/BIA) programs, services, functions and activities (PSFAs) while remaining on the Chugachmiut Board of Directors to guide other services. The remaining tribes and one tribal entity exercise their sovereign powers by assumption of partial PSFAs through a pass through agreement with Chugachmiut while directing at the board level, PSFAs entrusted to Chugachmiut for administration.

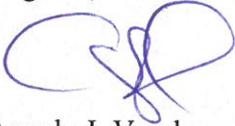
Overall, we welcome DOI/BIA's simplified approach to funding each of the four types of contract support costs (CSC) and appreciate the hard work and accomplishments of the Bureau of Indian Affairs CSC Workgroup.

However, we note that the Draft Policy is silent on an area that is of considerable consequence and benefit to subrecipient tribes. We recommend the addition of language to clarify and systematize DOI's authority to fund both direct and indirect contract support dollars to eligible subrecipient tribes. Doing so will provide much needed guidance to DOI/BIA and tribal personnel in the negotiation and reconciliation of contract support dollars for eligible tribal subawardees/subrecipients.



The Indian Health Service's Draft CSC Policy contains such language on pages 12, 13, 14, 19, and 20; all of which clearly states its understanding of its authority to fund CSC dollars when a request is made by an awardee/receiptant on behalf of eligible sub-awardee/subreceiptants. We strongly recommend that DOI/BIA insert similar language into its Draft Policy.

Regards,



Angela J. Vanderpool, Executive Director
Chugachmiut

CC: Hankie Ortiz, Deputy Bureau Director
Bruce Loudermilk, Alaska Regional Director
Sharee Freeman, Director, Office of Self-Governance