

IHS TRIBAL SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication and Education
P.O. Box 1734, McAlester, OK 74501

Telephone (918) 302-0252 ~ Facsimile (918) 423-7639 ~ Website: www.tribalselfgov.org

Via E-mail: Denise.Turk@ihs.gov

Original sent USPS

February 5, 2015

Dr. Yvette Roubideaux, M.D., M.P.H.
Acting Director
Indian Health Service
801 Thompson Avenue, Suite 440
Rockville, MD 20852

Re: Mandatory Appropriations for Contract Support Costs

Dear Dr. Roubideaux:

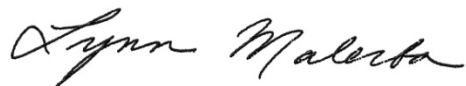
I write on behalf of the Tribal Self-Governance Advisory Committee (TSGAC) to provide you with our input and recommendations regarding mandatory appropriations for Contract Support Costs (CSC). Tribes were very pleased to learn that the FY2016 President's Budget proposal includes a timeline for reprogramming CSC to become mandatory appropriations. This will, at last, match Federal budgetary policy with the legal requirement in the Indian Self-Determination and Education Assistance Act (ISDEAA) to fully fund CSC obligations to Tribes. This change in policy provides stabilization in the budget for all Indian Health Programs; Direct Service and Self-Governance alike. It also strengthens the government to government relationship between the Indian Health Service and Tribal Governments in recognition of Tribal Governments assumption of Federal functions. Our Committee offers the following initial recommendations on behalf of the TSGAC to advance this important and historic proposal:

- 1. Tribal Consultation on Mandatory CSC Appropriations should begin immediately and be expedited in a timely manner.** The budget reprogramming that Indian Health Service (IHS) was required to perform in FY 2014 in order to fully fund CSC requirements was unacceptable to Tribes across the country. Indian Country is unified in its resolve that health services should not be compromised or funding re-programmed or reduced in order for the government to satisfy its obligation to fund CSC. Therefore, we urge the Agency to begin Tribal Consultation as soon as practicable in order to expedite implementation of mandatory appropriations for CSC, which will protect health service budgets in the future.

2. **Mandatory Appropriations for CSC should be implemented in Fiscal Year 2016.** In the IHS Budget Justification that was released earlier this week, the proposal to transfer CSC to a mandatory appropriation is slated to begin in FY 2017. It is a very high Tribal priority that permanent solutions addressing CSC be implemented as soon as possible, thus preserving the integrity of the health services appropriation. The IHS has been consulting with Tribes robustly over the last year and a half, and has completed a great deal of progress in technical improvements to achieve consistent and accurate calculations of CSC requirements across Areas. Further, the IHS has been actively working with the CSC Workgroup on these issues and recommendations. We believe the work of the CSC Workgroup (which was a Tribal/Federal partnership) has provided assurance and consistency not only in the process for calculating Contract Support Costs but also in the accuracy of the required budgeted amount requested. Therefore, we fully support the implementation of mandatory CSC appropriations beginning in FY 2016, rather than FY 2017.

In closing, the TSGAC is very encouraged by this development, and appreciates your partnership and leadership to advance long-term solutions for funding CSC. We look forward to working with you closely over the coming months on this important proposal. If you would like to discuss further, please do not hesitate to contact me at (860) 862-6192; or via email: lmalerba@moheganmail.com. Thank you.

Sincerely,



Chief Marilyn (Lynn) Malerba
Chair, Tribal Self-Governance Advisory Committee

cc: TSGAC and Technical Workgroup Members
P. Benjamin Smith, Director, Office of Tribal Self-Governance