

## **NORTHWEST PORTLAND AREA INDIAN HEALTH BOARD**

Burns-Paiute Tribe  
Chehalis Tribe  
Coeur d'Alene Tribe  
Colville Tribe  
Coos, Suislaw &  
Lower Umpqua Tribe  
Coquille Tribe  
Cow Creek Tribe  
Cowlitz Tribe  
Grand Ronde Tribe  
Hoh Tribe  
Jamestown S'Klallam Tribe  
Kalispel Tribe  
Klamath Tribe  
Kootenai Tribe  
Lower Elwha Tribe  
Lummi Tribe  
Makah Tribe  
Muckleshoot Tribe  
Nez Perce Tribe  
Nisqually Tribe  
Nooksack Tribe  
NW Band of Shoshone Tribe  
Port Gamble S'Klallam Tribe  
Puyallup Tribe  
Quileute Tribe  
Quinalt Tribe  
Samish Indian Nation  
Sauk-Suiattle Tribe  
Shoalwater Bay Tribe  
Shoshone-Bannock Tribe  
Siletz Tribe  
Skokomish Tribe  
Snoqualmie Tribe  
Spokane Tribe  
Squaxin Island Tribe  
Stillaguamish Tribe  
Suquamish Tribe  
Swinomish Tribe  
Tulalip Tribe  
Umatilla Tribe  
Upper Skagit Tribe  
Warm Springs Tribe  
Yakama Nation

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**SENT VIA TELEFAX: (301) 443-4794**

February 22, 2012

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

Dear Dr. Roubideaux:

As you are aware, the Northwest Portland Area Indian Health Board (NPAIHB) represents all forty-three federally-recognized Tribes in the Portland Area. On behalf of our Tribes, we are responding to your March 2, 2012 Dear Tribal Leader Letter, in which you requested input on two important contract support cost (CSC) issues.

The first issue related to the confidentiality of CSC data with a deadline of March 30, 2012. We will respond to this request under a separate letter by the deadline. The second issue relates to allocation of the FY 2012 CSC increase and whether the IHS Director should establish an Indian Self-Determination (ISD) fund for new and expanded programs. This letter addresses this issue and provides our recommendation pursuant to your request.

The NPAIHB has long represented CSC issues on behalf of Portland Area Tribes. The Board is also an Indian Self-Determination and Education Assistance Act (P.L. 93-637, or ISDEAA) contractor with the Indian Health Service (IHS). As with every Tribe we represent, the Board is due unpaid CSC funding stemming from past years' contracts with the IHS. Like our Tribes, we are also included on the IHS' CSC shortfall report. In our role we are very familiar with the position of Portland Area Tribes on CSC issues. This includes whether the IHS should use CSC program increases toward establishing an ISD fund or whether the increase should be used completely toward shortfall.

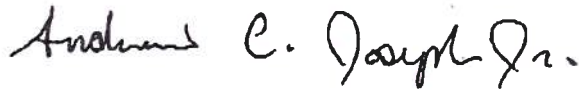
Portland Area Tribes were supportive of the 2007 proposal developed by Dr. Charles Grim, former IHS Director, to allow the IHS to provide funding on an annual basis for new and expanded programs. Despite the fact that Portland Tribes are owed a significant amount of funding from past years' CSC shortfall, Northwest Tribes supported this policy because it allowed new Tribal programs to benefit from the achievements of self-determination. Portland Tribes support direct service Tribes—and those existing contracting or compacting programs—to expand their self-determination opportunities. Thus, we believe that funds should be set aside each year for new and expanded programs in order to achieve the Congressional and Secretarial goals of supporting self-determination for all Tribes and Tribal Organizations.

We also believe that the IHS has a responsibility to uniformly and fairly administer its CSC Policy. The Policy speaks to the issue of fairness and stipulates that the "IHS will provide for a uniform and equitable system of distributing CSC funds to new and existing

Public Law 93-638 (ISDEAA) compacts and contracts and preserve and support each awardee's right to contract under P.L. 93-638." <sup>1</sup> Thus, we recommend the IHS Director should establish a ISD fund for new and expanded programs when there is a program increase adequate to do so. This year's CSC increase of \$73 million is adequate to provide up to \$10 million for an ISD fund and to provide the balance to address past years' CSC shortfalls. This recommendation is consistent with the goals of promoting Indian self-determination and complies with the requirements of the IHS CSC Policy.

Thank you for the opportunity to provide comments on this very important matter. If you should have any questions concerning our recommendation, please contact Jim Roberts, Policy Analyst, at (503) 228-4185 or by email [jroberts@npaihb.org](mailto:jroberts@npaihb.org).

Sincerely yours,

A handwritten signature in black ink that reads "Andrew C. Joseph Jr." with a stylized flourish at the end.

Andrew Joseph, Jr., NPAIHB Chair  
Colville Tribal Council Member  
Portland Area Representative, CSC Workgroup

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<sup>1</sup> The Indian Health Service, "Contract Support Cost Policy", at Section 6-3(1)(C).