

**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

2121 SW Broadway
Suite 300
Portland, OR 97201
(503) 228-4185
(503) 228-8182 FAX
www.npaihb.org

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.

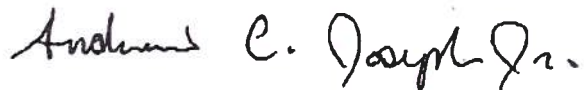
Portland Area Tribes were supportive of the 2007 proposal developed by Dr. Charles Grim, former IHS Director, to allow the IHS to provide funding on an annual basis for new and expanded programs. Despite the fact that Portland Tribes are owed a significant amount of funding from past years' CSC shortfall, 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." ¹ 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.

Sincerely yours,

A handwritten signature in black ink that reads "Andrew C. Joseph, Jr." The signature is written in a cursive style.

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

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