

IBC/OMB

1. Work through the Aging list of Tribes negotiating current IDC rates (60-70% of Tribes don't have current rates)
Recommendation: IBC to identify problems with timeframe to approve agreements
 - (a) Streamline process and reduce IBC administrative burden
 - (b) If proposal not approved within 90 days, proposal deemed approved
 - (c) Multi-year rates
 - (d) Assigning consistent examiners and the examiners process when negotiating
2. Identification of exclusions
Recommendation: Correctly identify pass thrus and exclusions in base definition (Modify standard language to reflect what Tribe has negotiated in the DC base)
3. IBC representative attend the CSC meetings
Recommendation: ASIA to request IBC representative be a member of WG
4. Clearinghouse for disseminating IDC rates/proposals
Recommendation: IBC to develop website with security controls
5. Consistency between IBC and DCA
Recommendation: IBC and DCA to meet to share best practices

DOI/IHS

1. ISDEAA
Recommendation: No changes to the Law.
2. CSC funding
Recommendation:
 - a) Work with Congress and OMB to develop legislation to make CSC funding a mandatory indefinite appropriation.
 - b) X-year CSC appropriation
3. 100% CSC funding
Recommendation: No program dollars should be used to fund CSC.
4. New program dollars
Recommendation: When the President requests an increase in a given program, the President's Budget should also identify the projected additional CSC requirement that is associated with that increase.
5. Sequestration
Recommendation: Tribes and Federal Government to be restored the amount that was sequestered (Both program and CSC).
6. CSC distribution "Overpayment"
Recommendation: BIA/IHS should adopt a fair, predictable and consistent approach for dealing with CSC "overpayments".
 - a) Adequate notice to the Tribes of "overpayments" with appeal rights.
 - b) Option to repay in the current year or with an off-set in the following year.
 - c) "Overpayment" defined as a distribution of CSC based on the most current IDC rate and most current negotiated DCSC or lump sum negotiated amounts at September 30. The calculation of the "overpayment" is based on the most current available rate at September 30. That date is used for every Area/Region to include OSG, no exceptions.
7. CSC policy consistency as much as possible, for example: IDC rate 3 yrs or 4 yrs

Recommendation:

- a) BIA and IHS staff to jointly review policy and provide recommendations to CSC workgroups. (Please note- DCSC should be excluded from this consistency analysis as the BIA CSC workgroup will continue to work on this). The CSC Policy of both Agencies to follow their respective missions.
 - b) Retain the three pool structure. It works for years where 100% CSC funding is not available.
 - c) Provisions need to be established for non-current IDC rate adjustments (CDA claims, fixed-carry forward IDC rate adjustments)
8. CSC Training
- Recommendation:
- a) DOI-Develop training model with CSC workgroup members and Awarding Officials on CSC policy, implementation on data required for the CSC report.
 - b) Currently BIA offers ISDEAA classroom training, webinars, and on-line training
 - c) IHS-Develop CSC training
 - d) Attach trainings to National Meetings (Example: TBIC, NCAI, SG Conference, Providers Conference, Partners in Action, etc.)

BIA

1. Timely distribution of funds (Program and CSC)
Recommendations:
 - a) Deadline should be established for all programs
 - b) Review of distribution/obligation process to reduce backlog
 - c) Tribes provide required documentation as soon as possible
 - d) Disseminate information on any funding increases or decreases as soon as possible
2. Increase percentage of DCSC to salaries due to increase in fringe costs
Recommendation: Increase percentage to 18% of program salaries
3. CSC Report
Recommendation:
 - a) Statement of what the individual is certifying
 - b) Establish a data cutoff date (September 30)
4. Small and Needy Tribes without IDC rates
Recommendation: Provide CSC in the amount of \$65,000 or their total contracted 106(a)(1) amount, whichever is less
5. Increased workload for Lump Sum negotiations (due to Super Circular/raised audit threshold)
Recommendation: Training of BIA and Tribal staff to include creation of templates, samples and training mentors
6. Possibility of pilot rates (negotiated fixed reimbursement rate)
Recommendation: Have BIA research IHS pilot project to determine if it might be a feasible option

OSG

1. Submission Form
Recommendation: To develop submission form that captures all data elements necessary to complete the CSC calculation and seek OMB approval for future years.
2. Timely distribution of funds
Recommendations:

- a. Deadline should be established for all programs
 - b. Review of distribution/obligation process to reduce backlog
 - c. Tribes provide required documentation as soon as possible
 - d. Disseminate information on any funding increases or decreases as soon as possible
 - e. Hiring of a budget analyst
3. Increase percentage of DCSC to salaries due to increase in fringe costs
Recommendation: Increase percentage to 18% of program salaries

BIE

1. Administrative cost grant

Recommendation: Consideration of full funding of the Administrative costs grant

2. Choctaw Decision Schools

Recommendation:

- a) Consistency in applying the exclusions
- b) Consistency in applying criteria for eligibility
- c) All Choctaw Decision Schools be included on the CSC report

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