

# Contract Support Cost National Workgroup Update



# CSC Workgroup Purpose

The CSC Workgroup meets to further the federal governments' administration of CSC within IHS. The Agency, in active participation with Tribes, has developed a comprehensive CSC policy to implement the statutory provides of the ISDEAA.

## California Representatives

Tribal Representative

**Chris Devers**

Technical Representative

**Bill Gallagher**

Tribal Representative

**Preston Pete**

Federal Representative

**Beverly Miller**

# CSC Policy Serves as a Guide

- CSC Policy is a guide for IHS and Tribes during
  - Preparation
  - Negotiation
  - Determination
  - Payment
  - Reconciliation Process

CSC Policy is located on the IHS webpage:

[https://www.ihs.gov/ihm/index.cfm?module=dsp\\_ihm\\_pc\\_p6c3#6-3.1](https://www.ihs.gov/ihm/index.cfm?module=dsp_ihm_pc_p6c3#6-3.1)

# Policy Guiding Principles

- Process should be Efficient
- Minimize Litigation
- Government to Government Relationship
- Minimize burdens imposed upon Tribes and IHS
- Assure Consistency
- Assure Transparency
- Built on trust among IHS and Tribes
- On a regular basis the Policy will be reviewed to ensure it is working

# CSC Workgroup Meetings

- August 16, 2017 in Tulsa, Oklahoma
- March 6-7, 2018 in Albuquerque, NM
  - Dear Tribal Leaders Letter December 21, 2017
    - Temporarily Rescinded 6-3.2E(3) which addresses duplication
    - The Tribal workgroup formally objected to the rescission as we were not consulted with nor were Tribal Leaders

# CSC Workgroup Meetings

- March 6-7, 2018 Continued
  - The Tribal workgroup formally objected to the rescission on January 3, 2018 as we were not consulted with nor were Tribal Leaders
  - 13 Cases were provided by IHS that IHS stated justified their decision to rescind the policy
- Additional meetings are in the works for 2018 to discuss an upcoming Dear Tribal Leaders Letter on CSC and to continue working on the Policy.

# California Tribal Data

- 26 Tribal Programs have a negotiated Indirect Cost Rate from the DOI or HHS.
- 13 Tribal Programs negotiate directly with IHS and have Indirect Type Costs.
  - Through discussion at this last workgroup meeting, programs with Indirect Type costs are having to go through detailed negotiations because of IHS's interpretation of the CSC Policy.

# Questions ?

## IHS Contacts:

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- Wes Simmons [wesley.simmons@ihs.gov](mailto:wesley.simmons@ihs.gov)

## CA Tribal Representatives:

- Chris Devers [ccdevers@gmail.org](mailto:ccdevers@gmail.org)
- Preston Pete [ppete@sythc.org](mailto:ppete@sythc.org)
- Bill Gallagher [bgallagher@indianhealth.com](mailto:bgallagher@indianhealth.com)



# Thank you

- Questions, comments, feedback on how the CSC policy and template is working for you may be directed to any of the CSC National Workgroup Members
- If you wish to make your comments in writing (which is preferred), please send them to [Beverly.Miller@ihs.gov](mailto:Beverly.Miller@ihs.gov)