



May 18, 2018

RADM Michael D. Weahkee,  
Assistant Surgeon General, U.S. Public Health Service  
Acting Director, Indian Health Services  
5600 Fishers Lane  
Mail Stop: 08E86  
Rockville, MD 20857

Dear Mr. Werhkee,

The Pueblo of Laguna is submitting this response for Consultation on the Indian Health Service (I.H.S.) Indian Health Manual Part 6- Services to Tribal Governments and Organizations, Chapter 3- Contract Support Costs (CSC policy), section 6-3.2E (3)- Alternative Methods for Calculating Indirect Costs Associated with Recurring Unit Shares (commonly known as the "97/3 Method or 97/3 Split").

Contract Support Costs funds provide necessary support for implementation of awards annually for the Pueblo. Actions and changes to the CSC policy must ensure optional support for the tribe. Expedient negotiations with the Pueblo and I.H.S. is primary. Thus, the Pueblo of Laguna supports **Option 2**. Option 2 allows for a case by case determination with I.H.S. and tribal discussions to determine and agree upon the best method and approach for the Pueblo.

Please ensure that the Pueblo is sent information on the overall feedback I.H.S. receives during this consultation process.

Thank you for this opportunity to provide feedback on the CSC issue.

Sincerely,

**PUEBLO OF LAGUNA**

Virgil A. Siow  
Governor