June 21, 2017

Michael S. Black  
Acting Assistant Secretary – Indian Affairs  
U.S. Department of Interior  
Office of the Secretary  

VIA EMAIL: consultation@bia.gov

Dear Mr. Black:

Thank you for soliciting input regarding DOI reorganization per President Trump’s Executive Order 13871, 82 Fed. Reg. 13959 (March 13, 2017).

By way of background, Kawerak, Inc. is the tribal consortium in the Bering Strait Region of Alaska, where there are 20 federally recognized tribes. Our organization was incorporated 44 years ago, and compacts with the US government for services formerly provided by the Bureau of Indian Affairs, as well as for tribal transportation funding. Kawerak works closely with the Office of Self Governance to successfully compact the services and funding to provide services to over 7500 people in 16 communities.

Recommendations: Given the close working relationship between compacting tribes and the Office of Self Governance (OSG), the OSG needs to report directly to the Assistant Secretary of Indian Affairs (ASIA). This would provide tribes and tribal organizations who are performing the functions of the federal government better access to the ASIA. OSG has been serving an increasing number of tribes, who are moving away from BIA direct services to contracting and compacting independently. As it stands, there are three layers of bureaucracy between OSG and the ASIA. Additionally, as OSG serves more and more tribes, the ASIA should ensure that adequate resources are provided to serve tribes and tribal organizations who enter into self-governance compacting agreements.

Another recommendation for restructuring is to examine all of the programs within the DOI that could be compacted by tribes and tribal governments. Self governance is a proven mechanism for delivering federal services efficiently and effectively. In fact, this concept should be further expanded to departments outside of DOI. Tribes and tribal organizations are increasingly eager to not only have increased authority over matters that impact them, but also additional responsibilities.

Thank you for the opportunity to comment. I would appreciate a summary of the listening session, which I am unfortunately unable to attend.
Sincerely,

KAWERAK, INCORPORATED

[Signature]
Melanie Bahnke, President/CEO

cc: Sharee Freeman, Director of OSG