




Traditional Bentwood Hat

Sun'aq Tribe of Kodiak

**Proudly representing members of the
Sun'aq Tribe of Kodiak**

To: Desk Officer/OMB, and Jack Stevens Division Chief, OIEED
From: Brenda Schwantes, P.L. 102-477 Program Director 
Date: 10/23/2014
RE: OMB Control Number 1076-0135, Comments re: Reporting System for P.L. 102-477

Comment 1 - Federal Register Notice was published with improper links to proposed reporting forms which made it impossible for individuals/the general public to comment on the proposed changes or see the referenced previous comments. The "Functional Cost Categories" cannot be found using this Federal Register notice.

Suggestion: Please re-submit the Federal Register notice so that the references and comments are available to be reviewed by the general public.

Comment 2 - Under the "Functional Cost Categories" category, Administrative Costs, the proposed new Financial Reporting form (Version 2), should ONLY include on line item "f" Indirect Costs. For example, I am the program administrator for 477, and the case manager serving clients directly. The proposed reporting cost category would require our Tribe to count twice the 477 Program Director's salary under Program Operations Expenditures, and under Administration/Indirect Cost Expenditures.

Line item "f Administration/Indirect Cost Expenditures" will not reflect true Indirect Costs.

Suggestion: Remove the word "Administration" on line item "f" on the proposed new Financial Report, and leave "f" solely as Indirect Cost Expenditures.