



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

AUG - 4 2022

Dear Tribal Leader:

This letter is in follow up to the Dear Tribal Leader Letter dated May 24, 2022, inviting you to consult on the funding methodology for the Small Tribe Supplement budget line item (previously known as the Small and Needy program).

During the consultations held on June 21 and 22, Tribal Leaders requested that the Bureau of Indian Affairs provide an explanation of the current funding methodology for the Small Tribe Supplement distributions for FY 2021 and FY 2022, any modifications that have been made from the methodology used previously, and data regarding the amount of Small Tribe Supplement funding allocated to each eligible Tribe for FY 2020, 2021 and 2022.

Enclosed is an outline of the Small Tribe Supplement funding methodology used for FY 2020 and 2021, along with a table that reflects actual allocations for FY 2020 and FY 2021 and a proposed distribution for FY 2022. If you have any questions, please contact Ms. Rose Petoskey, Senior Counselor to the Assistant Secretary-Indian Affairs at (202) 208-7163 or via email at rose.petoskey@bia.gov. I look forward to receiving your written comments.

Sincerely,

Bryan Newland
Assistant Secretary – Indian Affairs

Enclosure

Small Tribe Supplement Funding Distributions by Tribe

Fund Center	Tribe	FY20 Distribution	FY21 Distribution	Proposed FY22 Allocation
AAEE01002T	Native Village of Afognak	52,411	44,870	44,870
AAEE01004T	Native Village of Akhiok	45,825	37,664	37,664
AAEE01065T	Native Village of Cantwell	35,997	16,963	16,963
AAEE01088T	Native Village of Chitina	32,153	27,063	27,063
AAEE01135T	Eklutna Native Village	36,384	30,386	30,386
AAEE01216T	Village of Iliamna	16,778	11,004	11,004
AAEE01237T	Native Village of Karluk	49,780	44,238	44,238
AAEE01254T	King Salmon Tribe	37,217	24,311	24,311
AAEE01279T	Native Village of Larsen Bay	39,600	32,716	32,716
AAEE01309T	Mentasta Traditional Council	33,340	26,140	26,140
AAEE01353T	Nondalton Village	46,518	39,403	39,403
AAEE01367T	Alutiiq Tribe of Old Harbor	27,751	21,594	21,594
AAEE01370T	Native Village of Ouzinkie	38,152	31,673	31,673
AAEE01376T	Pedro Bay Village	6,241	714	714
AAEE01398T	Native Village of Port Lions	18,720	14,004	14,004
AAEE01419T	Salamatoff Tribe	43,356	33,104	33,104
AAEE01478T	Native Village of Tazlina	56,147	41,184	41,184
AAEE01505T	Native Village of Tyonek	39,566	33,372	33,372
AAEE01531T	Tangirnaq Native Village (FKA Lesnoi Village (AKA Woody Island))	59,204	51,086	51,086
AAEE01586T	Kaguyak Village	56,286	48,118	48,118
AAEE02021T	Village of Aniak	30,860	24,141	24,141
AAEE02092T	Chuloonawick Native Village	27,891	20,769	20,769
AAEE02170T	Native Village of Georgetown	22,050	17,127	17,127
AAEE02241T	Kasigluk Traditional Elders Council	54,275	45,886	45,886
AAEE02276T	Native Village of Kwigillingok	31,962	13,276	13,276
AAEE02341T	Newtok Village	24,521	18,417	18,417
AAEE02371T	Native Village of Paimuit	24,401	18,249	18,249
AAEE03016T	Village of Anaktuvuk Pass	67,702	59,849	59,849
AAEE03025T	Arctic Village	99,343	57,961	57,961
AAEE03028T	Atkasuk Village (Atkasook)	81,022	70,555	70,555
AAEE03127T	Village of Dot Lake		16,031	16,031
AAEE03230T	Kaktovik Village	61,848	54,410	54,410
AAEE03354T	Native Village of Nuiqsut	97,034	85,854	85,854
AAEE03390T	Native Village of Point Lay	63,101	61,973	61,973
AAEE03517T	Village of Venetie	66,577	167,465	167,465
AAEE03518T	Native Village of Venetie Tribal Government		66,978	66,978
AAEE03519T	Village of Wainwright	43,874	37,751	37,751
AAEE09020T	Angoon Community Association	21,385	15,155	15,155
AAEE09108T	Craig Tribal Association	20,491	43,528	43,528
AAEE09128T	Douglas Indian Association	24,569	42,604	42,604
AAEE09380T	Petersburg Indian Association	14,313	9,624	9,624
AAEE09443T	Skagway Village	58,215	47,211	47,211
AAEE09532T	Wrangell Cooperative Association		14,728	14,728
AAFF57411T	Shakopee Mdewakanton Sioux Community		3,336	-
AAHH55613T	Fort McDowell Mohave-Apache Indian Community	128,012	116,778	116,778
AAHH68618T	Yavapai-Prescott Indian Tribe	10,770	6,191	6,191
AAHH61657T	Winnemucca Indian Colony of Nevada		131,225	131,225
AAHH61660T	Yerington Paiute Tribe		24,556	-
AAHH61661T	Yomba Shoshone Tribe		32,866	30,414
AAHH68674T	Tonto-Apache Tribe of Arizona		15,281	15,281
AAHH69648T	Las Vegas Paiute Indians		9,378	9,378
AAHH69689T	San Juan Southern Paiute		160,000	-
AAJJ51630T	Tejon Indian Tribe	1,956	6,091	6,091
AAJJ53584T	Agua Caliente Band of Cahuilla Indians	12,235	7,144	7,144
AAK801087T	Cheesh-Na Tribe (formerly Native Village of Chistochina)	16,207	6,228	6,228
AAK801148T	Native Village of Eyak (Cordova)	44,995	34,744	34,744
AAK801185T	Gulkana Village		16,390	16,390
AAK801348T	Ninilchik Village	27,885	1,720	1,720

Small Tribe Supplement Funding Distributions by Tribe

Fund Center	Tribe	FY20 Distribution	FY21 Distribution	Proposed FY22 Allocation
AAK801809T	BBNA Chignik	48,475	53,076	53,076
AAK801809T	BBNA Chignik Lagoon	45,356	53,076	53,076
AAK801809T	BBNA Clark's Point	71,851	88,958	88,958
AAK801809T	BBNA Egegik	49,054	64,150	64,150
AAK801809T	BBNA Ekuk	43,607	76,802	76,802
AAK801809T	BBNA Ekwok	52,029	43,217	43,217
AAK801809T	BBNA Ivanoff	46,365	79,871	79,871
AAK801809T	BBNA Kanatak	32,650	47,124	47,124
AAK801809T	BBNA Perryville	42,317	59,735	59,735
AAK801809T	BBNA Pilot Point	39,132	103,284	103,284
AAK801809T	BBNA Portage Creek	40,456	65,833	65,833
AAK801809T	BBNA Chignik Lake		34,542	34,542
AAK801809T	BBNA Kokhanok Village		7,638	7,638
AAK801809T	BBNA Levelock Village		41,565	41,565
AAK801809T	BBNA Manokotak Village		2,730	2,730
AAK801809T	BBNA Port Heiden		42,923	42,923
AAK801809T	BBNA New Stuyahok		97,104	97,104
AAK801809T	BBNA New Halen Village		34,842	34,842
AAK801809T	BBNA Twin Hills Village		62,629	62,629
AAK801810T	APIA Pauloff Harbor	30,764	34,619	34,619
AAK801810T	APIA Agdaagux Tribe of King Cove		8,122	8,122
AAK801851T	CHUGACHMIUT Chanega	34,874	3,838	3,838
AAK802812T	AVCP Bill Moores Slough	71,218	36,857	36,857
AAK802812T	AVCP Hamilton	21,631	11,968	11,968
AAK802812T	AVCP Napaimute	22,626	1,529	1,529
AAK802812T	AVCP Oscarville	24,274	9,955	9,955
AAK802812T	AVCP Red Devil	21,851	7,972	7,972
AAK802812T	AVCP Akiachak		285	285
AAK802812T	AVCP Akiak		470	470
AAK802812T	AVCP Atmaultuak		22,969	22,969
AAK802812T	AVCP Mekoryuk		11,743	11,743
AAK802812T	AVCP Umkumiut		3,221	3,221
AAK803817T	TCC Alatna	43,107	4,220	4,220
AAK803817T	TCC Birch Creek	27,677	5,179	5,179
AAK803817T	TCC Circle	69,903	728	728
AAK803817T	TCC Evansville	39,635	165	165
AAK803817T	TCC Healy Lake	48,658	87	87
AAK803817T	TCC McGrath Native Village		11,230	11,230
AAK803817T	TCC Takotna	41,706	7,196	7,196
AAK803817T	TCC Telida	40,800	871	871
AAK803817T	TCC Tetlin	38,667	17,932	17,932
AAK804815T	Maniilaq Shungnak	65,184	20,503	20,503
AAMM20715T	Pueblo of Santa Ana		13,772	-
AAPP06106T	Hoh Indian Tribe	31,824	39,933	27,081
AAPP10131T	Upper Skagit Indian Tribe of Washington	17,197	37,640	37,640
AASS00039T	Chickahominy Indian Tribe-Eastern Division		156,052	-
AASS00041T	Rappahannock Tribe, Inc.		156,052	-
AASS00043T	Nansemond Indian Nation		156,740	-
AASS00040T	Upper Mattaponi Tribe		156,052	-
AASS00038T	Chickahominy Indian Tribe		156,052	-

Bureau of Indian Affairs
Distribution Methodology for Small Tribes Supplement
FY 2021/FY 2022

Prepared by: BIA, Office of Indian Services, July 2022

INQUIRY: The methodology utilized for FY 2021 and FY 2022 distributions of Small Tribes Supplement (STS) appropriations and whether there have been any changes to the methodology used previously.

RESPONSE: As conveyed in the Tribal consultation sessions held on June 21 and 22, 2022, the methodology utilized for the distributions of STS appropriations for FY 2021 and FY 2022 by the Bureau of Indian Affairs (BIA) is as follows:

Criteria:

- (1) Tribal population of 1,700 or lower and
- (2) Tribal Priority Allocation (TPA) base funding level of:
 - \$160,000 for small Tribes in the lower 48 states.
 - \$200,000 for small Tribes in Alaska.

This criteria is vested in the 1994 joint BIA/Tribal report¹ which established the foundation for STS funding. The report established:

- \$160,000 for small Tribes in the lower 48 states.
- \$200,000 for small Tribes in Alaska.

In determination of which Tribe was deemed a small and needy Tribe, the Report held that the core determination was the total amount of base TPA funds allocated to each Tribe. The Report also determined that the Tribal population to be considered in this category was 1,500² or below. Additionally, in this calculation, it was determined at that time (1994) that the TPA line items, General Administration and Trust Services, would not be included in the total calculation.

The criteria above followed the justification(s) provided in the both the FY 2021 and FY 2022 President's Budget Request to the Congress as enacted by the Congress for each fiscal year:

FY 2021 - \$5.0 million enacted level

Program Overview³:

The Small Tribes Supplement (TPA) program provides a minimum base level by which eligible small tribes can run viable tribal governments. The initiative began in FY 1995 by tribes in an attempt to bring some equity in TPA-base funding. There are 574 federally recognized tribes, of which 205 fall into the Small Tribes Supplement criteria. In addition to a population of 1,700 or less, these Tribes fell below the threshold for minimum TPA-base funding required to establish and maintain viable tribal governments. The initial Tribal

¹ *The Tribal Budget System, Preliminary Assessment of Most Needy Small Tribes, by the Joint Tribal/BIA/DOI Advisory Task Force on Bureau of Indian Affairs Reorganization, April 1994.*

² The population criteria was updated to 1,700 with the re-establishment of the program in FY 2012. FY 2021 Budget Request to the Congress, BIA, IA-TGS-5.

³ Source: FY-2021 President's Budget Request, BIA, p IA-TG-4.

initiative determined the threshold to be \$160,000 in TPA-base funding for tribes in the lower 48 States and \$200,000 for tribes in Alaska.

The Small Tribes Supplement tribe funding is provided to ensure that eligible participating tribes have the base-level funding to run a government. Over time funding was scrutinized and re-analyzed to determine the best methods of distributing these funds. Funding supports strong and stable Tribal governments and provides the resources needed to Tribes to fund their basic governmental affairs to better position the Tribe to contract and compact BIA programs.

FY 2022 - \$7.0 million enacted level

Program Overview⁴:

The Small Tribes Supplement (TPA) program provides a minimum base level by which eligible small Tribes can run viable Tribal governments as many small Tribes lack resources to support the governmental capacity required to develop their respective communities. The initiative began in FY 1995 by Tribes in an attempt to bring some equity in TPA base funding. Today, there are 574 federally recognized Tribes, of which an estimated 200 fall into the Small Tribes category. Threshold criteria established in 1994 specified (1) \$160,000 in TPA base funding for Tribes in the lower 48 States with a population of 1,600 or less; (2) \$200,000 for Tribes in Alaska with a population of 1,600 or less; and (3) case-by-case evaluation of those Tribes which had a population of over but near 1,600. The population criteria was updated to 1,700 with the re-establishment of the program in FY 2012.

The FY 2022 budget request will support bringing all known, eligible small Tribes up to the established minimum funding levels based upon the original negotiated levels of base funding. The BIA will conduct a Tribal consultation in FY 2021 to bring the program criteria up to date. Criteria under consideration during the consultation include what types of funding should be considered in the minimum funding level calculation, how the 2021 Tribal enrollment levels submitted by Tribes to the BIA will be factored into eligibility determinations, and what, if any, changes should be made to the minimum eligibility funding thresholds. These criteria have not been updated with input from the Tribes since the program was reinstated in FY 2012.

Sources utilized Under each Criteria:

Sources for Criteria:

- (1) Tribal population of 1,700 or lower: SOURCE - FY 2021 Tribal Enrollment Data as reported/self-certified by Tribes to the BIA (Regions).
- (2) Determination of TPA Funding level: SOURCE - FY 2021 Base TPA line items as determined by each BIA Region and certified by the servicing BIA Regional Director with input from the IA Office of Self Governance (OSG) (for self-governance compacts) and the IA Office of Budget and Performance Management.

Changes from Previous Determinations:

- (1) Base TPA Line items – previously there were exclusions of TPA line items for General Administration and Trust Services. For FY 2021 and FY 2022 determinations, all line items that are TPA Base amounts were included in the calculation to determine base TPA budgets that were below (a) \$160,000 (Mainland Tribes) and (b) \$200,000 (Alaska Tribes).

Each Region verified to the BIA Office of Indian Services the TPA base amount for each Tribe in its servicing area. TPA base funding levels included in self-governance compacts were provided

⁴ Source: FY-2021-Budget-Request-to-the-Congress, BIA, IA-TGS-5.

by the OSG and the Office of Budget Planning and Performance Planning, Office of the Deputy Assistant Secretary (Management), Indian Affairs, working with the Regions to identify the TPA base amounts in self-governance compacts in the specific servicing BIA Region.

Further, there were no exclusions of any line item in the FY 2021 and FY 2022 determinations as done previously. All base TPA line items are afforded the flexibility authorized by the Congress to reallocate base TPA amounts for any program within TPA. Therefore, all TPA base line items were treated equitably and included in the determination of the base TPA funding level.

- (2) Tribal Population – previously the Tribal population levels utilized were from the Tribal enrolment data for NAHASDA which, in some cases, had different Tribal enrollment levels than the most current FY 2021 Tribally self-certified enrollment numbers provided to the BIA. Therefore, the most current data available to the BIA, the FY 2021 Tribally self-certified enrollment numbers, was utilized to determine the minimum eligibility level of 1,700 or less in Tribal population for FY 2021 and FY 2022. This change in the source for Tribal enrollment levels made a significant change in the number of Tribes eligible to be included in the SNT distribution for FY 2021 and FY 2022, as again, the NAHSDA levels differed in some places from the current self-reported/certified FY 2021 Tribal enrollment data.

Future FY Distributions

Tribal input and comments received after the June 21 and 22 Tribal consultation sessions will be considered for future distribution methodology. Tribal comment period has been extended to August 15, 2022. Comments may be submitted to consultation@bia.gov.