



April 1, 2020

The Honorable Steven T. Mnuchin
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Ave. NW
Washington, D.C. 20220

The Honorable Tara Sweeney
Assistant Secretary for Indian Affairs
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Re: Coronavirus Relief Fund, Tribal Set-Aside of \$8 Billion

Dear Secretary Mnuchin and Assistant Secretary Sweeney,

The Alaska Federation of Native (AFN) writes to submit the following comments on the implementation of the tribal set aside in Coronavirus Relief Fund as outlined in the Coronavirus Aid, Relief, and Economic Security Act (CARES ACT). AFN is the largest statewide Native organization in Alaska. Our membership includes 175 federally recognized tribes, 155 village corporations, 11 regional corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs. Alaska tribes, along with our tribal health organizations, corporations, and nonprofits, are playing a critical role in responding to Alaska's Novel Coronavirus (COVID-19) challenges. Many of our tribes, tribal consortiums, and Alaska Native corporations will be submitting their comments as their specific issues become clearer. This letter is an initial letter of comments. We will have more suggestions in by this weekend. As you can imagine, we are very busy up here supporting the critical shortages of our Native health system, coordinating with the State of Alaska and others.

AFN requests that a minimum of \$750,000 in funding per tribe be included in the method for allocating the tribal set-aside. This methodology would help ensure parity among tribal communities and mirrors the distribution of the relief funds to states. Currently, each state receives a base amount of \$1.25 billion, with the remaining based on their share of the total population of the United States. Additionally, with a minimum of \$750,000 base distribution will help ensure tribes can address immediate needs, impending crisis as well as prepare for a possible second wave of COVID-19 in the fall of 2020. The total cost would be \$430.5 million and would leave roughly \$7.57 billion to be distributed for other purposes.

Many of our Native communities share a significant proportion of Alaska's vulnerable population, such as elders and those with underlying health conditions who are at a higher risk to COVID-19. As you may also know, many communities in rural Alaska are overcrowded and lack adequate access to healthcare and basic sanitation. These conditions severely exacerbate pandemics such as COVID-19. Additionally,

tribal leaders and members are in the best position to understand the health care needs and priorities of their communities, and funding for rural Alaska should be prioritized to include tribes and tribal health organizations through tribal self-governance funding mechanisms.

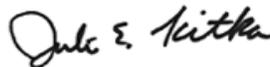
As such, AFN recommends that the following considerations be included in the methodology for the remaining balance of the tribal set aside in the Coronavirus Relief Fund:

- Specific funding to address cost differentials of remote and isolated locations, such as high energy costs, fuel, food security, and medical costs.
- Impacts on existing programs.
- Long unmet needs which are now a health hazard such as lack of public safety and law enforcement; additional targeted funds to address child welfare, domestic violence, and social services; resources to alleviate overcrowding in housing; and expediting solutions to the lack of running water and sewer, including new and upgrades. Changes in transportation for both travel and cargo should also be a consideration when distributing funds to tribal communities. Due to the remoteness of many tribal communities across our nation and the effects of social distancing can cause long and short term strains on our transportation infrastructure. Transportation factors affecting tribal governments should be considered in any methodology for distribution of the remaining funds in the Coronavirus Relief Fund.
- Increase communication needs must be prioritized to allow greater use of telemedicine, search and rescue, public safety, law enforcement, and first responders. Also, many tribes and Alaska Native businesses have been forced to change the way they operate and work remotely. Increased telecommunications costs of tribal governments need to be included in the methodology for the distribution of the remaining funds in the Coronavirus Relief Fund. This will also help tribal governments and Native communities prepare for future pandemics.
- A funding source for tribal governments to spur innovation to address the critical social risks and threats of COVID-19 and any future health threat.

AFN requests the funding be available directly to tribal governments, tribal organizations, and existing Indian Self-Determination and Education Assistance Act agreements.

Thank you for your consideration. If you have questions regarding this letter, please call me at AFN at 907-274-3611.

Sincerely,



Julie Kitka
President

Cc: U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan
U.S. Congressman Don Young