



Native American Contractors Association

Working to enhance the economic self-sufficiency of America's indigenous peoples

1514 P Street NW Suite 2 Washington, DC 20005 | Phone: 202.758.2676 | Fax: 202.758.2699 | www.nativecontractors.org

December 7, 2010

Mr. Mike Grabell
ProPublica
One Exchange Plaza
55 Broadway
23rd Floor
New York, NY 10006

SENT VIA EMAIL & CERTIFIED MAIL

Dear Mr. Grabell:

The Native American Contractors Association (NACA) is in receipt of your questions from December 2, 2010 for your upcoming story on Alaska Native Corporations (ANCs) and government contracting.

As you know, there has been a considerable amount of news attention on ANCs recently, including an ongoing, multi-part, front-page series by *Washington Post* reporter Robert O'Harrow. Several articles in this series contained a number of inaccurate and misleading statements about ANCs, which NACA has publicly challenged and corrected in a comprehensive analysis published on NACA's website (www.nativecontractors.org).

I invite you to carefully review the information on our website, which includes a battery of credible and reliable material addressing the important work and strong value of ANCs. The anticipated publisher of your story, *The USA Today*, has an obligation to ensure the articles that appear on its pages are balanced, objective, accurate, unique and newsworthy for the education and benefit of its subscribers. Thoughtful representation of the positions represented on NACA's website will ensure readers will receive a balanced view of the critical role Native Enterprises play in promoting economic self-sufficiency for their disadvantaged communities.

The information that follows contains important facts and historical context about ANCs. A complete understanding of this issue requires a fundamental appreciation for:

- the history of ANCs, why they were formed, and who they help;
- the enormous, yet often-forgotten, sacrifice the Alaska Native people made in exchange for Congressionally-promised economic development opportunities;
- the Congressionally-mandated mission of ANCs and how they fulfill it;
- the basis for ANC participation in the SBA's 8(a) Business Development Program;



- the reasons why ANCs require specific considerations within the 8(a) program;
- the need for ANC 8(a) participants to comply with all federal rules and regulations;
- the special trust relationship Alaska Natives share with the federal government;
- the positive impact ANCs have on the broader Alaska Native community, as well as the economy of the State of Alaska as a whole;
- the strong performance record and total value ANCs provide the federal government; and
- the unfair scrutiny of ANCs, which is out of proportion based on the small number of procurement awards they receive when compared to other federal contractors.

I am providing you this detailed look at Alaska Native Corporations to ensure you have the facts on these issues in advance of your story's publication.

I. History of Congressional Policies for Native People

Throughout America's history, Congress has contemplated what to do with America's Native people. During the past 150 years, Congressional policies for Native people have constantly changed, as Members have reevaluated the effectiveness of certain policies and programs based on a sense of what they believed was right, fair and appropriate for indigenous populations. The table below provides a historical look at the way these policies have evolved over time:

Timeline	Federal Indian Policy Era
Pre-Contact	Self-Sufficient, Evolving Native Cultures
Contact-1828	"Discovery" – Colonial/Missionary Dispatches
1828-1887	"Treaty Policy" – Land Dispossession/Reservations removal, aggression, westward expansion
1887- 1934	"Assimilation Policy" – Make Them Like Us boarding school education, land allotments, automatic citizenship
1934-1945	"Self-Governance Policy" – Let Them Be Them land restoration, government-to-government relationship, federal recognition of Tribes
1945-1961	"Termination Policy" – The Dark Years urbanization, revert to assimilation
1961-Today	"Self-Determination & Self-Governance Policy" Native solutions for Native challenges best

Some of these policies had a positive outcome. Many did not, as Native people endured everything from extermination to forced relocation, assimilation and boarding schools. Historically, Native people retained 56 million acres of lands, roughly 2.43% of our original lands. Alaska Natives were the last people of the United States to receive the right to vote in 1924. Yet, over the years, Native people have experienced a resurgence of diverse cultures,



and are starting to witness an increase in socio-economic status. Today, there is a new era of federal Indian policy focused on empowering Native peoples and Tribes to self-govern and achieve self-sufficiency. It is essential those covering this issue understand that Alaska Native Corporations and Native participation in the 8(a) program were born in this era.

II. Alaska Native Claims Settlement Act (ANCSA)

In the 1960s, the United States discovered that Alaska held within its boundaries billions of barrels of oil; oil that was desperately needed to power the nation's economy. Before development could occur, however, the federal government had to settle the land claims of hundreds of thousands of Alaska Native people – the indigenous people of Alaska.

On December 18, 1971 President Nixon signed into law the Alaska Native Claims Settlement Act (ANCSA). It was the only settlement of its kind between Native people and the federal government.

As part of ANCSA, Alaska Natives forfeited their aboriginal title to 88% of their traditional lands worth trillions in untapped oil. In exchange, Congress designated Alaska Natives owners (or Native “shareholders”) of community-owned corporations and promised them economic development opportunities to help them succeed.

ANCSA created 13 regional corporations and over 200 village corporations representing different geographic regions and Native cultures. Corporate stock was provided to every Alaska Native born on or before the passage of the Act based on cultural and family ties. Through ANCSA, Alaska Natives received title to only 44 million acres of land and \$962.5 million in compensation for the rest of the land they lost.

Congress created these community corporations to manage land and resources and engage in commerce and business for the benefit of the Native community.

ANCSA was an experiment. It was a compromise between the government and Alaska Native people. Native people struggled during the first 25 years, as many ANCs failed, went through bankruptcy or were on the brink of destruction. Based on the enormous need of the hundreds of thousands of disadvantaged Native people ANCs collectively represent, Congressional amendments later granted ANC access to the Small Business Administration's 8(a) program.

III. Native Enterprise Participation in the SBA 8(a) Program

The Small Business Administration's (SBA's) 8(a) Business Development Program was a result of the Civil Rights Era of the 1960's. Congress recognized that minorities, women, veterans, and other small and disadvantaged individuals did not have equal access to the federal marketplace, and special access to government contracts was a key way for the government to open that door. The 8(a) program was Congress' attempt to give small and disadvantaged businesses greater access to the federal marketplace and promote individual business success.



Congress recognized the devastating economic and social situation of Tribal reservations and Alaska Native villages, and in the late 1980's and early 1990's tried to level the economic playing field as Native Americans and Alaska Natives fought to overcome poverty, rampant social ills, and lack of access to basic infrastructure that other Americans had. The federal government, through the commerce clause of the U.S. Constitution, various treaties, congressional acts, and common history, has a trust relationship with Native Americans and Alaska Natives. Based on this special relationship, Native enterprises were included in the 8(a) program. (The statutory language in ANCSA at 43 U.S.C. 1626(e)(4)(A) specifically states, "Congress confirms that Federal procurement programs for tribes and Alaska Native Corporations are enacted pursuant to its authority under Article I, Section 8 of the United States Constitution.")

A significant distinction, however, applies to differentiate Tribes, ANCs, and NHOs from other 8(a) businesses. Native Enterprise 8(a)s have a communal responsibility. They are not investor owned 8(a) firms that benefit one or two people. Instead, they are Native government and community owned and controlled firms that were created to advance entire communities and cultures. Their net profits support Tribal government functions, social and cultural programs, education, employment and training, and economic development. In fact, in 2006, the Government Accountability Office published a report entitled "Increased Use of Alaska Native Corporations' Special 8(a) Provisions Calls for Tailored Oversight," which details numerous benefits ANCs provide to their people. Motivated critics of ANC contracting often cite this report to advance their anti-ANC positions; however, this thorough GAO investigative analysis failed to identify *any* examples of provable ANC misconduct or abuse of the federal procurement system. The report notes only that the SBA should provide additional oversight to better monitor ANC contracting activities, a recommendation NACA supports.

Noteworthy, too, is NACA's position that all Native Enterprises must comply with the rules and regulations that govern their participation in government contracting and the 8(a) program. As with all federal contractors, if companies are not in compliance with government contracting and 8(a) requirements, or fail to take proper measures to establish such compliance, they must face the appropriate consequences. As with every other industry in America, there are rare occasions when individual Native Enterprises face these challenges. However, as many in the media and some in Congress have historically done, it is irresponsible and unfair to mischaracterize an entire class of federal contractors as abusing the federal procurement system when such isolated incidents occur. Federal procurement is complex; in the event the compliance of a Native Enterprise is questioned – and proactive steps are taken to alert the SBA and implement the necessary changes to ensure compliance moving forward – these Enterprises should not be vilified for handling such issues in an ethical, responsible manner.

NACA has implemented a number of programs designed to mentor Native Enterprises and reinforce the importance of maintaining compliance with all regulatory requirements. These programs include:



- A “Best Practices” guide outlining standards in government contracting.
- A Code of Ethics, which each NACA member must sign annually, stating, in part, that they maintain the highest ethical business standards and comply with government contracting laws, regulations and requirements and self-govern with appropriate internal control systems, transparency, and corporate best practices.
- Workshops, such as NACA’s 2010 April session in Tulsa, OK, to train Native Enterprises on federal contracting, company structure, contract management and compliance and the importance of strong internal ethics and compliance practices, among other topics.
- An online training program, which is regularly added to, that provides training for Native Enterprises on government contracting, the 8(a) program, contract management, and compliance-related issues, to name a few.

Native Enterprise contract proposals are thoroughly scrutinized by Department of Defense contracting officers, whose job and responsibility is to represent the interests of U.S. taxpayers. Native enterprises must set a high standard of excellence based on the simple fact that *it makes sound business sense to do so*. Native Enterprises recognize that they must provide the government good value and exceptional service at competitive rates. If they do not, government customers will not use them – regardless of their 8(a) contracting status. The marketplace is crowded with highly competent, highly skilled federal contractors; such competition compels Native Enterprises to deliver the best quality service to succeed. ANCs provide a viable, cost-effective option for contracting officers to efficiently meet the contracting needs of the federal government. Restricting ANC participation in 8(a) would significantly increase bureaucracy and cause severe delays in servicing what often are time-sensitive contracting needs of the federal government.

Critics of ANCs have challenged the practice of ANC sole source contracting through the 8(a) program, claiming it results in a lack of competition. The statistics speak for themselves. *In 2007, 32% of all federal contracts were sole sourced, yet Native 8(a) sole source awards represented only 0.08% of the federal contracting pie.* NACA finds it ironic that ANCs have been positioned as an example for abusive sole source contracting when the striking majority of sole source contracts are being awarded to non-Native businesses. What’s more, the SBA itself rejected the notion that the government receives anything less than best-value on sole source awards to ANCs. In his testimony before the Subcommittee on Contracting Oversight in 2009, SBA Associate Administrator of Government Contracting and Business Development, Joseph Jordon, stated:

“...it is also a bit of a misnomer to say there is no competition when it comes to 8(a) ANCs. In 2008, of the figures stated in terms of 8(a) contracts, over \$650 million was through 8(a) competition. In terms of sole source authority not providing the best value, I do somewhat reject that on its premise. I believe that competition is good. I believe that promoting competition is good. I believe that general principle. The President has talked about competition, transparency, accountability. However, in every contract, and this also



applies to all sole source contracts, the contracting office must certify that the government got fair and reasonable value and it must monitor performance of that contract and can terminate it if the contracting officer sees fit. So to say that the government did not get the best value because it was sole sourced is, or should be, inaccurate.”

Senate Subcommittee on Contracting Oversight hearing Q&A, page 23
<http://www.gpo.gov/fdsys/pkg/CHRG-111shrg250/pdf/CHRG-111shrg250.pdf>

For perspective, Boeing this year received a single sole-source contract worth an estimated \$12 billion – more than twice what ANCs, Tribes, and Native Hawaiian Organizations (NHOs) received last year combined.

ANCs, Tribes, and NHOs collectively received less than 1.3 percent of all contracts awarded by the federal government in 2007. 98.7 percent of all government contracts in 2007 were awarded to non-Native businesses. Yet, ANCs continue to be the focus of disproportionate media interest and continued Congressional examination.

All Native Enterprise 8(a) contracts, including those that are sole-sourced, are scrutinized by experienced government contracting officers and by Defense Contract Audit Agency auditors who understand the procurement marketplace. Sole source prices are negotiated, not dictated, and every contract term undergoes a comprehensive review to ensure the government receives best value. ANCs are required to perform a minimum of 51% of each service contract. Native Enterprises, like all other federal contractors, have the ability to subcontract up to 49% of a service contract – contrary to assertions by ANC critics who argue ANCs simply “pass through” the contracts they are awarded. Native Enterprises are no different from any other federal contractor in their ability to use subcontractors in this regard.

ANCs do have unique considerations within the 8(a) program -- and for good reason. ANCs, by definition, are small minority businesses because their shareholders collectively represent one of *the* most disadvantaged populations in America. It is disingenuous to characterize the growth and size of certain ANCs without considering two critical factors:

- 1) Government contracting is a low-margin business, where profits typically range anywhere from 2%-5% per contract. One must look at the actual profit margin of each ANC to determine the overall pool of available resources it has to return to its respective shareholder base.
- 2) ANCs represent hundreds, in some cases thousands, of shareholders who are classified as individual owners of each respective business. In order to have a meaningful positive economic impact on the Alaska Native community, ANCs require access to larger contracts beyond the award limitations imposed on other 8(a) minority businesses that are typically owned by only one or two individuals.

It is important your readers understand that new SBA regulations already in motion will significantly improve transparency and oversight of ANC, Tribal and NHO 8(a) contracting. Among other provisions, these regulations will require ANC, Tribal, and NHO 8(a)s to submit



annual financial reports and specify how benefits are being delivered to Alaska Native communities as a result of 8(a) participation.

What's more, Section 811 of the National Defense Authorization Act of FY2010 will require contracting officers to seek justification and approval for each ANC, Tribal and NHO awarded contract in excess of \$20 million. This provision applies only to ANCs, Tribes and NHOs and was specifically designed to make it more difficult for Native entities to win government contracts of higher dollar value.

IV. Improving the Socio-Economic Condition of Alaska Natives

Native Enterprises, including ANCs, are fulfilling their goal of creating economic development opportunities for their shareholders while addressing the social and cultural needs of their communities. More than ever before, thanks in part to their participation in the 8(a) program, ANCs are providing shareholders with dividend payments, scholarships, internship programs, cultural preservation initiatives and other benefits to their respective communities. This support has empowered the next generation of Alaska Natives with opportunities that were previously unavailable. Many who never had access to education or job training programs now have the chance to go to college, start businesses and improve their quality of life.

As a direct result of the 8(a) program, ANCs are returning essential benefits to their communities. A 2009 NACA survey of 11 ANCs showed these Enterprises alone provided over \$530 million in various categories of benefits to over 67,000 shareholders between 2000-2008. Over \$341 million of this figure represented shareholder cash dividends.

Additionally, according to the ANCSA Regional Association 2010 annual report, since the formation of ANCs from 1970 to 2007, the Alaska Native high school graduation rate increased from 14 percent to 46 percent. During the same time period:

- The proportion of Alaska Native people graduating from a four-year college increased from one percent to eight percent
- Inflation-adjusted household income rose by 50 percent
- The proportion of Alaska Native people living below the poverty line decreased from 47 percent to 22 percent
- The proportion of Alaska Natives with incomes at 200 percent of the poverty level or greater rose from 29 percent to 54 percent
- The proportion of Alaska Native households without complete plumbing dropped from 51 percent to 13 percent



- In 2008 alone, the twelve regional corporations distributed roughly \$171 million in dividends – and more than ten percent of their employment base represented Alaska Native individuals
- ANCs made contributions of \$11.1 million to 3,200 recipients and endowments in 2008 alone as well

Access to education is a top priority of ANC leaders. Recently, the State of Alaska has underfunded rural education of Alaska Natives by roughly \$200 million per year, a fact at the center of a current class action lawsuit. This failure of the Alaskan education system reaffirms the important role ANCs play in filling this void by offering essential scholarship opportunities to disadvantaged Alaska Native people, opportunities that otherwise would not exist. One Native Corporation has awarded more than \$5.7 million in scholarships to more than 3,000 shareholders from 2000-2008. Many young Alaska Natives are first-generation college graduates who embody the spirit and purpose of Native 8(a) participation. Others are able to attend vocational schools, enabling them to prepare for skilled occupations that pay far more than the minimum wage. As future generations benefit from resources provided by 8(a), more Alaska Native people will go to college, earn degrees and return to Alaska to lead these Enterprises and promote continued economic development within the state. *This is precisely what Congress intended by including ANCs in the 8(a) program.* The positive impact of 8(a) is already evident; however, creating economic self-sufficiency for tens of thousands of Alaska Native people will take considerable time. With continued access to vital programs, like 8(a), NACA is confident this goal can be achieved.

Recent news reports have irresponsibly assigned average dollar values on the total amount of benefits received by the Alaska Native people as a result of ANC 8(a) participation. Each Native community and ANC is unique, and the benefits provided are based on the culture, needs, challenges and issues facing each shareholder group. While one ANC may focus on scholarships, another may focus on dividend distributions or subsistence advocacy. Benefits arrive in many forms, and not all can be calculated on a dollar-for-dollar return basis to each individual shareholder. ANCs invest in cultural preservation programs, social programs, health initiatives and other ways; applying a specific dollar calculation on the way these projects benefit each individual is an inappropriate way to measure their true shareholder value.

Ultimately, it is the role and responsibility of ANC shareholders to ensure benefits are appropriately flowing back to the community. Self-determination, or the ability of Native communities to monitor and determine their own benefits, is core to federal Indian policy and recognizes the unique relationship between Native people and the federal government. No individuals or entities or governments are better suited to determine which benefits to provide Native people based on the particular needs of the Native communities than the Native people themselves. These individuals represent the checks and balances of their Native corporation; if or when shareholders feel their Native corporation is no longer serving in their best interests, they have the power to affect change through the election of a new board of directors, which in turn can reorganize the senior management team.



ANCs are having a positive impact on their communities. Yet, ANCs still have a great deal of work to do to promote economic self-reliance in the communities they collectively represent. The economic state-of-affairs of the Alaska Native people is serious, and requires continued ANC access to initiatives such as the 8(a) program to help Native people achieve success. Native people continue to face enormous socio-economic challenges. Consider these statistics:

- American Indians have a 40 percent higher infant death rate compared to whites. (IHS)
- American Indians are twice as likely to die from diabetes, 60 percent more likely to have a stroke, 30 percent more likely to have high blood pressure and 20 percent more likely to have heart disease. (IHS)
- The violent-crime rate among American Indians and Alaska Natives is more than 2.5 times the national figure. (DOJ)
- American Indian poverty (26%) exceeds that of all other race categories. (J Taylor-Bishaw & Iceland, 2003)
- Indian poverty exceeds twice the national average. (J Taylor-2000 US Census; NCAI)
- Indian unemployment is twice the US average nationwide and more than three times as high on reservations. (Harvard Project, 2000; NCAI)
- Indian reservations have 46% unemployment, even after the advent of gaming. (NCAI)
- The Alaska Native suicide rate is over three times the national average. (ADHHS)
- Approximately 31% of rural Alaskan households lack plumbing. (ADHHS)
- Homicides among Alaska Natives are five times the national average. (ADHHS)
- Incomes of Alaska Natives are 50% to 60% lower than other Alaskans. (ISER)
- Half of Native families have incomes below \$30,000 a year, compared with about one quarter of the non-Native families. (ISER)
- Alaska Natives are three times as likely as other Alaskans to live in poverty. (ISER)
- College attendance among Alaska Natives is growing, yet only six percent have bachelor degrees compared to 25 percent among other Alaskans. (ISER)

The recent movement by some in Congress aimed at restricting the right of all Native Enterprises to participate in the 8(a) program is misguided. Thousands of Native Americans, both in Alaska and in the Lower 48, need this program. Limiting Native Enterprise participation in 8(a) will only result in a dramatic reduction of resources for their disadvantaged communities – and reverse the progress that has been made to improve the lives of Native people. Further, if Native Enterprises lack the resources and are unable to continue to provide the social safety net now offered from their profits, those responsibilities will default to the state and federal government.



Generational poverty cannot be resolved overnight. For centuries, Alaska Native people lived a traditional subsistence way of life – living off the land and sea – dependant on a barter system, as opposed to a currency-based capitalistic economy. Just 40 years ago, the federal government created ANCs and compelled Alaska Native people – with no training, experience or professional skills – to succeed within a Western business environment. Imagine the insurmountable task Alaska Native people faced; many had no high school education, yet they were expected to build viable businesses that would grow and provide benefits in perpetuity for their Native people.

Any suggestion that ANCs could possibly eradicate such entrenched economic challenges within just ten years of successful participation in the 8(a) program is unrealistic. ANCs are on the path to creating economic self-sufficiency for their communities and making a positive impact on the Alaska Native community. Thanks to profits from 8(a), the first generation of Alaska Native leaders are beginning to emerge with college degrees and are returning to their communities to lead their people to the next level of success. This trend will continue, as long as ANC participation in the 8(a) program continues to provide access to contracts of sufficient size to return meaningful value to Alaska Native shareholders.

V. ANC Executive Compensation

Much has been written recently about ANC executive compensation. If you plan to touch on this in your story, it is important your readers understand that ANCs have a fiduciary responsibility to represent the best interests of their shareholders. Until 8(a) can provide sufficient scholarships and opportunities for shareholders to develop critical business skills to run these entities themselves, they must recruit non-Native executives to fulfill their obligation to maximize value for all of their shareholders. It would be a disservice to Alaska Native people if ANCs were restricted to only hiring unqualified individuals to run these companies, as some seem to support or suggest. To do so would guarantee certain failure and maintain the socio-economic status quo for the Alaska Native population in perpetuity. The 12 regional corporations all have Native executives, which represents a significant increase from just a few years ago. More and more Native people are being hired to management level positions – a trend that will only grow provided ANCs maintain continued access to meaningful 8(a) contracts.

VI. Conclusion

When ANCSA was passed in 1971, Congress mandated ANCs provide socio-economic benefits to their shareholders – as Alaska Natives struggled in a state with little viable market economy, where the simple cost of good and services far exceed those in the Lower 48 – in exchange for extinguishing Alaska Native land claims to millions of acres of oil-rich lands. ANCs have responsibly answered the call, providing various forms of socio-economic benefit to roughly 20 percent of the state's population.

Last summer, the 16th billion barrel of oil was delivered to consumers from the Trans-Alaska pipeline. For decades, the oil produced from Alaska has had a direct impact on the health and strength of America's economy -- an achievement made possible thanks to the enormous



sacrifice of the Alaska Native people. These facts cannot be overlooked when evaluating the “fairness” of ANC participation in promised government programs that are helping disadvantaged people improve their quality of life.

Yet, today Native Enterprises are being penalized for doing exactly what they were asked to do. The position by some in Congress has sadly changed from one that originally encouraged economic self-reliance when ANCSA was passed, to one that seeks to restrict the level of success ANCs are allowed to achieve. It’s the equivalent of saying, “We originally wanted ANCs to be successful – but we never thought ANCs could be that successful” to justify reforms to promised initiatives, such as 8(a), that are core to federal Indian policy. Such reform attempts make Native leaders question if some in Congress seek to revert to the Termination Indian policy Congress held in the mid-1900s.

Senator Claire McCaskill is one of the most outspoken opponents to Native participation in government contracting today. While NACA supports all efforts to increase transparency and oversight of government contracting, we fail to understand the Senator’s motivation for singling out Native Enterprises in her quest to confront “waste, fraud and abuse” in government contracting. We have many supporters in Congress from both parties who respect the special trust relationship Native Enterprises share with the federal government. We have many Democratic supporters who embody the political party’s platform of helping minorities break the chains of despair and hopelessness through grit, hard work and self-determination. And we remain astounded as to why the Senator has chosen to be such an outspoken adversary of Native Enterprises, a category providing real value to real people who desperately need it.

Native Enterprise participation in the 8(a) program is one of the only federal Indian programs that is working to improve the lives of Native people. Now is not the time to roll back the clock on years of socio-economic progress.

I strongly encourage you to contact the following individuals for your story, as they will provide important balance and perspective regarding Native 8(a) issues:

Jacqueline Pata Johnson
Executive Director
National Congress of American Indians
Phone: (202) 466-7767
Email: jpata@ncai.org

Lance Morgan
President & CEO
Ho-Chunk, Inc.
Phone: (402) 878-2809
Email: hochunk@aol.com

Julie Kitka
President
Alaska Federation of Natives
Phone: (907) 274-3611
Email: nevakitka@aol.com

Helvi Sandvik
Present & CEO
NANA Development Corporation
Phone: (907) 265-4100
Email: Helvi.Sandvik@nana.com

With respect to your specific questions, I’m not familiar with the data or methodology you used to create your ANC revenue vs. profit comparison and am therefore unable to comment



on your analysis. Separately, it would be improper to assign an average dividend for all Alaska Native shareholders. Shareholders own various levels of stock at different valuations that rise and fall based on the annual priorities and benefit allocations of each of their respective corporations. Further, such a calculation would be an inaccurate way to measure the overall way in which benefits are flowing back to Native communities for reasons I addressed earlier in this document.

If you have any questions, or would like to discuss this further, please email me at sarah@nativecontractors.org.

Thank you for your time and attention.

Sincerely,

Sarah L. Lukin
Executive Director
Native American Contractors Association

cc: Jim Henderson, Managing Editor, Business, *USA Today*
Carol Stevens, Managing Editor, News, *USA Today*
Todd Mayman, General Counsel, *USA Today*
Anthony Franco, Piliero Mazza