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CHEROKEE NATION®

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Office of the Chief

Chuck Hoskin Jr.
Principal Chief

Bryan Warner
Deputy Principal Chief

May 5, 2021

Anthony Riley, Acting Associate Deputy Bureau Director
Division of Workforce Development
Bureau of Indian Affairs - Office of Indian Services
1001 Indian School Rd, NW, Unit 225D
Albuquerque, NM 87104

Dear Mr. Riley:

On behalf of Cherokee Nation, the largest federally recognized Indian tribe in the United States with more than 390,000 citizens and spanning a 7,000 square mile reservation in northeastern Oklahoma, I write to you today in response to Federal Register publication 2021-08116. Federal Register publication 2021-08116 concerns information collection for Public Law 102-477, the Indian Employment and Related Services Consolidation Act.

Since 2002, the Cherokee Nation has used the 477 Program to provide seamless provision of employment and training services to our tribal citizens. The program allows us to combine services without excess burden, resulting in large administrative savings. These savings ensure we can spend our dollars on direct services, rather than waste time on redundant reporting or shuffling our citizens between case workers. Currently, we operate nine different grants under our 477 plan, totaling over \$58.6 million. In the last fiscal year alone, while our funding was at \$20 million, we served over 3,509 Cherokee Nation citizens.

As you are aware, tribal leaders have been engaged with our federal partners for multiple years now regarding the interagency memorandum of agreement (MOA). Tribes have repeatedly asked that the MOA be revised in light of concerns expressed by tribal governments throughout the course of multiple listening sessions, requests for comments, and tribal consultations. The Bureau of Indian Affairs, tribes, and other federal agencies are currently working to update the 477 reporting form. In light of this, the information collection methods currently utilized by the federal government should remain in place while tribes and our federal partners work together to design an improved reporting system.

Should you have any questions, please reach out to Ashlee Fox, Self-Governance Coordinator and Assistant to the Principal Chief, at ashlee-fox@cherokee.org or 918-772-4205.

Sincerely,

Chuck Hoskin Jr.
Cherokee Nation Principal Chief