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May 14, 2021

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‘Aaron Payment’

RE: DOI – Native American Business Incubators Program Act

Sent electronically via: [consultation.bia.gov](https://consultation.bia.gov)

Dear Ladies/Gentlemen,

Please see attached written testimony being sent on behalf of the  
Sault Ste. Marie Tribe of Chippewa Indians.

**Respectfully,**

**Aaron A. Payment**

**Testimony**  
**Of**  
**Dr. Aaron Payment, Chairperson**  
**Sault Ste. Marie Tribe of Chippewa Indians**  
**Before The**  
**Department of Interior**  
**Regarding**  
**The Recently Enacted**  
**Native American Business Incubators Program Act**  
**May 12, 2021**

Dr. Aaron Payment, n'dizhnikaaz. Sault Ste. Marie Tribe of Chippewa Indians ndoo-debendaagoz. Kina Baawaa'ting Anishinaabek Omaa go nda Onji-kida. I am Dr. Aaron Payment. As the elected Chairperson of the Sault Ste. Marie Tribe of Chippewa Indians ("the Tribe"), I am submitting this testimony on behalf of my Tribe. This testimony is in regard to the newly enacted Native American Business Incubators Program Act. The proposed rule, discussed here, establishes the Indian Business Incubators Program ("IBIP") and the framework that will enable the Office of Indian Energy and Economic Development ("IEED") to provide grants. These comments reflect the Sault Ste. Marie Tribe of Chippewa Indians recommendations regarding the proposed regulations created to establish the program.

Background:

On October 20, 2020, Congress enacted the Native American Business Incubators Program Act, Public Law 116–174, which will be codified at 25 U.S.C. 5801 *et seq.* In the Act, Congress establishes the Native American Business Incubators Program. Congress found that, in addition to the challenges all entrepreneurs face when transforming ideas into profitable business enterprises, entrepreneurs face an additional set of challenges that requires special knowledge when they want to provide products and services in Tribal reservation communities. Congress further found that the business incubator model is suited to accelerating entrepreneurship in Tribal reservation communities, promoting collaboration to address challenges and providing individually tailored services to overcome the obstacles that are unique to each participating business, ultimately stimulating economic development in reservation communities. Business incubators accelerate the creation and development of businesses by offering a range of services to business owners such as: mentorships, networking, technical assistance, and access to investors.

#### Section 1187.20

This section is entitled, “How will IEED Evaluate Each Application?”

- In this section, the Sault Ste. Marie Tribe of Chippewa Indians recommends that IEED award a “preference” or a “priority” to Indian Tribes; Tribal colleges or universities; and to Tribal non-profit organizations that provide business and financial technical assistance.

#### Section 1187.21(b)

This section is entitled, “How Will IEED Evaluate The Proposed Location of the Business Incubator?”

- The Sault Ste. Marie Tribe of Chippewa Indians urges the IEED to recognize that transportation issues in Indian Country are significant. Unless business incubation services are within reservation boundaries, or within walking distance from a reservation, many Tribal people will have difficulty accessing the services. Therefore, Tribe recommends the word “significant” be added to the proposed section. In doing so, the language should read:  
“Give SIGNIFICANT priority to eligible applicants that will provide business incubation services on or near the reservation of the one or more communities that were described in the application.”

#### Section 1187.41

This section is entitled, “May IEED Renew a Grant Award?”

- The Sault Ste. Marie Tribe of Chippewa Indians recommends that an additional consideration be required for the IEED when it assesses the awardee. Specifically, the IEED must assess whether the incubator model designed by the awardee continues to be beneficial to the Tribe and to the businesses. We recommend that as long as the model remains beneficial to the Tribe and to the businesses, that the grant be renewed.

#### Section 1187.42

This section is entitled, “What May Awardees Use Grant Funds For?”

- The Sault Ste. Marie Tribe of Chippewa Indians recommends the funds be also allowed for staffing purposes.

#### Section 1187.45

This section is entitled, “What Reports Must the Awardee Submit?”

- The Sault Ste. Marie Tribe of Chippewa Indians recommends that in addition to the requirements already listed in the proposed rule, that the awardee also submit reports detailing capital investments and revenue growth.

#### Section 1187.52

This section is entitled, “How will IEED Coordinate With Other Federal Agencies?”

- One of the greatest problems facing economic development in Indian Country is the lack of practical broadband access. In this section of the proposed rule, the Sault Ste. Marie Tribe of Chippewa Indians recommends all named federal Departments and Agencies, be required to actively assist in the provision of broadband services to Indian Country. Specifically, the Tribe urges the addition of the following language at the end of the

section, “and provide broadband support to the maximum extent practicable.” In doing so, the language of the proposed rule should read:

“IEED will coordinate with the Secretaries of Agriculture, Commerce, and Treasury, and the Administrator of the Small Business Administration to ensure, to the maximum extent practicable, that awardees have the information and materials they need to provide Native businesses and Native entrepreneurs with the information and assistance necessary to apply for business and entrepreneurial development programs administered by those agencies AND PROVIDE BROADBAND SUPPORT TO THE MAXIMUM EXTENT PRACTICABLE.”

Conclusion:

Thank you for this opportunity to comment. If you have any questions or need additional information, please do not hesitate to contact me or the Sault Ste. Marie Tribe of Chippewa Indians Legislative Director, Mike McCoy at

[MMcCoy@saulttribe.net](mailto:MMcCoy@saulttribe.net)