

CSC Policy Crosswalk from Existing Policy to Proposed Final Policy

This crosswalk highlights policy changes, clarifications, and updates to the proposed policy provisions.

Section in Current Policy	Section in Proposed Final Policy	Policy Changes and Updates
National Policy Memorandum, NPM-SELF-D-1 Contract Support Costs	Indian Affairs Manual (IAM) Chapter XX Contract Support Costs	Policy Changes and Updates
1. Purpose	1. Purpose	Language is updated to reflect full payment of contract support costs.
2. Scope	2. Scope	Language is updated to ensure policy applies to all ISDEAA agreements.
3. Policy	3. Policy	Language is updated to reflect full payment of contract support costs.
	4. BIA CSC Workgroup	Identifies role of the BIA CSC Workgroup and establishes regular meeting schedule. Clarifies that Workgroup is not a substitute for tribal consultation.
4. Authorizing Legislation		Language is removed from policy.
5. Roles and Responsibilities		Language is removed from policy.
6. Definitions	5. Definitions	Language is removed from policy. Citations and links to existing definitions added.
7. Process for Determining Amounts of Start-Up, Direct, and Indirect CSCs	6. Pre-Award CSC (25 U.S.C. § 450j-a(1)(6))	Language is updated. Tribal Contractors will be reimbursed for pre-award costs only if the Tribal Contractor provided prior written notice to DOI. Strengthens federal accountability by providing explicit language on the review and approval process. Clarifies that pre-award CSC will be funded by reimbursement, as a one-time, non-recurring payment, and will be calculated based on actual expenditures.

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<p>8. Process of Allocating Funding Available for CSCs</p>	<p>7. Startup CSC (25 U.S.C. § 450j-1(a)(5))</p>	<p>Language is updated. Requires Tribal Contractors to submit a written budget identifying startup costs for the initial year of the agreement. Strengthens federal accountability by providing explicit language on the review and approval process. Clarifies that startup CSC will be funded as a one-time, non-recurring payment.</p>
	<p>8. Direct CSC (25 U.S.C. § 450j-1(a)(3)(A)(i))</p>	<p>Language is updated. Direct CSC will be calculated as follows: Current budget salary cost of 106(a)(1) program (minus fringe) x 15%.</p>
	<p>9. Indirect CSC (25 U.S.C. § 450j-1(a)(3)(ii))</p> <ul style="list-style-type: none"> • Negotiated Lump Sum • Simplified Method 	<p>Language is updated. Tribal Contractor's with a current IDC rate will be paid using that rate. If a Tribal Contractor does not have an approved IDC rate, DOI will negotiate a lump-sum amount for indirect-type costs or using the Simplified Method (30% of the 106(a)(1) amount). Only those tribes that do not meet the single-audit threshold are eligible for the Simplified Method. Tribal Contractors must initiate one of the options otherwise DOI will not pay any indirect CSC.</p>
<p>8. Process of Allocating Funding Available for CSCs</p>	<p>10. Overpayment of CSC</p>	<p>Language is removed from policy. As of 2014, the BIA will pay 100% of a tribal contractor's calculated contract support cost need.</p>
	<p>10. Overpayment of CSC</p>	<p>Language is added to identify and remedy overpayments as quickly as possible.</p>

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	11. Underpayment of CSC or Other Adjustments	Language is added to identify and remedy underpayments as quickly as possible.
9. BIA CSC Shortfall Report	12. CSC Annual Report to Congress	Language is updated. BIA and OSG shall provide information earlier in the year to ensure timely submission of the report to Congress.
	13. Disputes	Language is added. Explicitly requires that disputes be handled according to the ISDEAA regulations.
10. Effective Date	14. Effective Date	Policy will be finalized after tribal consultations are complete.
11. Approvals	15. Approvals	No change.
Appendix A	Attachment	Appendix is removed.
		Attachment lists examples of pre-award, startup and direct CSC.