

The federally recognized Prairie Band Potawatomi Nation resides on 77,000 acres in the northeast quadrant of the State of Kansas. The rolling flint hills of the Prairie Band Potawatomi Nation reservation, is located entirely within Jackson County, Kansas. Twenty-six miles south is the state capital of Topeka and 80 miles to the southeast is Kansas City, Missouri.

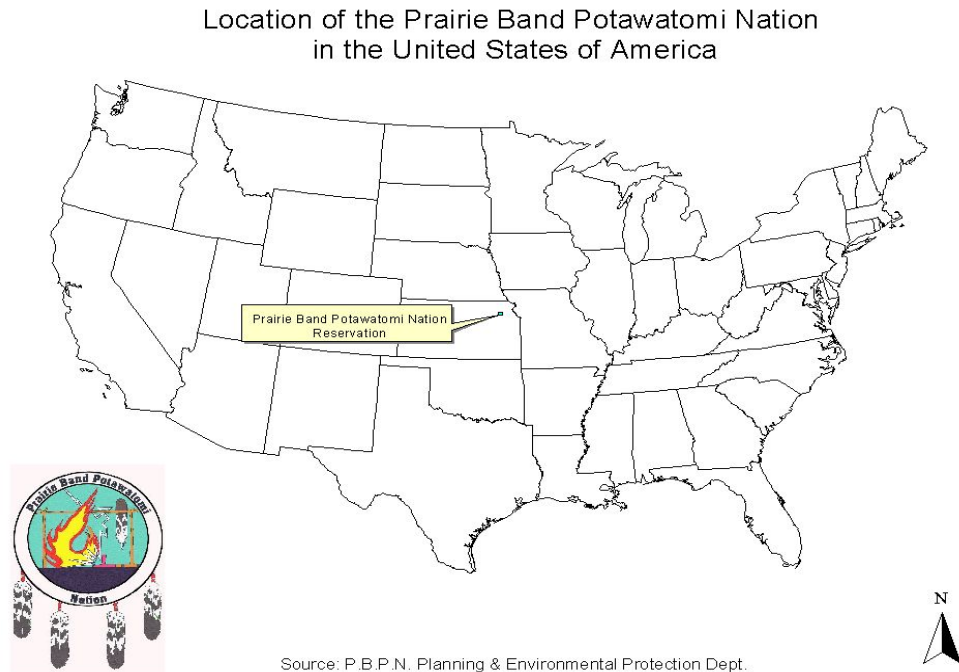


Figure 1-PBPN in the United States

The rural reservation is home to 1,469¹ residents including 869² of the 4,719² enrolled Tribal members. All four (4) federally recognized tribes of Kansas (Prairie Band Potawatomi Nation, Iowa Tribe of Kansas and Nebraska, Kickapoo Nation in Kansas, and the Sac & Fox Nation in Kansas) are located within the seven (7) counties of northeast Kansas (Jackson, Brown, Atchison, Jefferson, Shawnee, Pottawattomie, and Nemaha) as is the capital city of Topeka. The total American Indian population of the seven (7) counties is 8,228¹. The Prairie Band Potawatomi Nation maintains the largest land base of the rural reservation communities.

¹ 2010 US Census American Indian and Alaska Native Summary File DP-1 Profile of general Population and Housing Characteristics Prairie Band of Potawatomi Nation Reservation, KS

² Prairie Band Potawatomi Nation Enrollment office

Members of the respective tribes move freely and frequently between the tribal communities maintaining close personal, family, and cultural ties between them. The tribes face a unique set of challenges in their individual communities; however, Kansas tribes developed close working relationships to best address the common concerns of crime and victimization.

1. Describe the general form of your tribal government.

The Prairie Band Potawatomi Nation has established a constitutional government with all adult members serving as the General Council. Seven (7) members are elected to fill positions on the Tribal Council in staggered four-year terms. Positions include: Chair, Vice-Chair, Secretary, Treasurer, and three (3) member-at-large positions. The Tribal Council represents the General Council in the management of the daily operations of the tribal government.

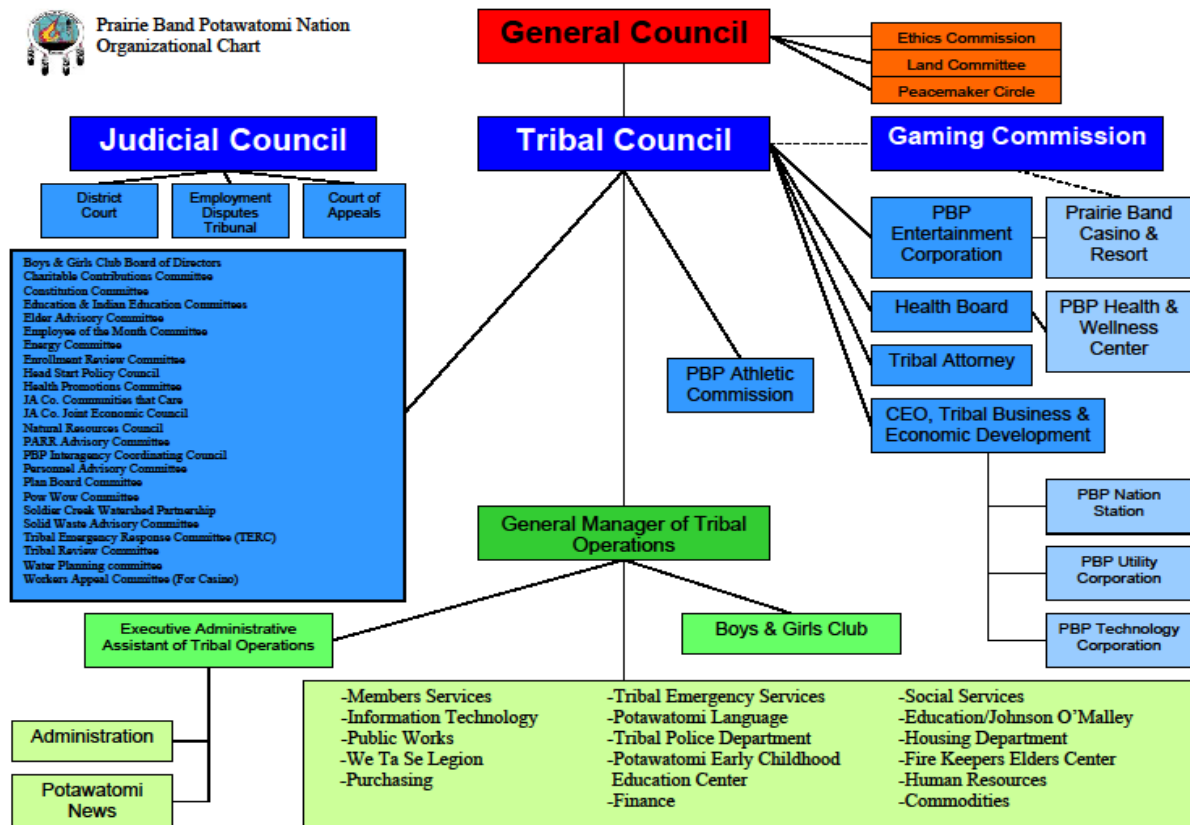


Figure 2 – Prairie Band Potawatomi Nation Organizational Chart

2. Briefly describe the tribal justice system. If services are not available within the tribe, please describe how they are accessed or provided.

Jurisdiction - The Prairie Band Potawatomi Nation has a vital self-government interest in the exercise of jurisdiction over all matters to the full extent not prohibited by federal law. Under Article I, Sec. 1, of the Nation's Constitution, the authority and jurisdiction of the Nation's courts shall extend to the fullest extent possible, including, without limitation, (a) to any and all persons, including non-members and members of the Nation and including any corporation, other entity or any person located or doing business on the Nation's Reservation and to all surface, subsurface or other territory or real or personal property of any nature within the Nation's Reservation.³ The Nation shares concurrent criminal jurisdiction with state and federal authorities. In 2005, due in large part to the leadership of the Nation, the state of Kansas passed legislation conferring state enforcement authority to Tribal Police Officers within reservation boundaries and upon the request of the state authorities outside of the reservation boundaries. This legislation greatly enhanced the department's ability to fulfill its obligation and mission by allowing tribal officers to deal directly with non-Indian offenders.

Prairie Band Potawatomi Tribal Judicial System – In 1992, the Nation established a criminal and civil court system pursuant to the Tribal Constitution, comprised of the Tribal District Court and Court of Appeals. The Dispute Resolution System was modified by constitutional amendment in 2008 wherein there was established a separate and independent branch of government, a Judicial Council of the Prairie Band Potawatomi Nation. The Judicial Council is comprised of a judge of the District Court, justices of the Court of Appeals and magistrates of the Employment Disputes Tribunal. The District Court is a general jurisdiction Court of record that hears all

³ Section 2-1-3. Tribal Court Jurisdiction Potawatomi Law and Order Code October 1, 2008

matters within the jurisdiction except for election and employment related disputes. The Court of Appeals is the Court of last resort to which appeals may be taken from the District Court. The judicial decisions of the Court of Appeals are final and are not subject to further appeal. The Employment Disputes Tribunal has the responsibility for deciding all government employment related disputes and is comprised of five (5) elected magistrates. Also established is the Peacemakers Circle, a separate mediating branch of the court. The General Council selects the Peacemakers Circle members and they have authority for mediating disputes voluntarily submitted to them by the parties to the dispute. The Healing to Wellness Court (HTWC) is a 52-week program for offenders who have alcohol and drug concerns. The HTWC program comprehensively addresses the substance abuse treatment needs of the mind, body, and spirit. Grant funding for the HTWC ended in 2014. Despite efforts to sustain the program through participant contributions and court fees, the Nation cannot maintain the program past 2015. Continuation of the HTWC is a priority identified for continuation within this proposal. Recently, the Nation adopted a Juvenile Justice code and is in the process of implementation. Full implementation of the Juvenile court is a priority identified in this proposal.

In December of 2009, the Nation completed construction of the Judicial Center located at the heart of the reservation adjacent to the Health and Wellness Center and Social Services offices. The Judicial Center is a modern building with a courtroom, jury room, several offices, three (3) small private areas for conferences, and recording equipment compliant with requirements under VAWA 2013.

Prosecution & Defense Counsel – The Nation has one (1) part-time contracted prosecutor who handles all criminal and child in need of care cases. Additionally, the Nation has a pool of

private attorneys the court appoints to represent indigent criminal defendants, parents of children in custody of the Nation, and serve as Guardian Ad Litem at no cost to the individual.

Law Enforcement – The Prairie Band Potawatomi Nation began providing law enforcement services for the reservation in 1997. The Tribal Police building, built in 1998 and remodeled in 2010, is located adjacent to the Tribal Government Center. The Law Enforcement building houses offices, 24/7 emergency communications dispatch center, vehicle service bay, evidence prep and storage room and lockers, and motor vehicle registration offices. It does not have detention capacities. Currently, the program consists of: 24 hr/day Patrol and service call response, Investigation, Animal Control and Wildlife Conservation, School Resource Officer Program, Records, 24 hr/day Dispatch Communications, Motor Vehicle Registration, Sex Offender Registration Program, and Tribal Police Explorer Program. In July 2011, the Nation became a sex offender registration and notification jurisdiction pursuant to the Sex Offender Registration Notification Act (SORNA). The Nation currently has six (6) offenders registered.

Through a Tribal Youth Program grant, and as a prevention and intervention measure, the Potawatomi Tribal Police established a Police Explorer Program in 2013. The Explorer program, led by the School Resource Officer, allows tribal youth to explore career and leadership opportunities while learning life skills and building their character. Goals of the program are to challenge young people to become responsible citizens of their communities and to build lasting relationships between community, school, and law enforcement. The department has hosted two Tribal Police Explorer Academies with 25 tribal youth successfully completing the 40-hour course. Explorer meetings are held weekly with an average of 10-12 youth attending each meeting which include practical exercises related to criminal investigations, processing

crime scenes, first-aid, defensive tactics, and traffic enforcement in addition to team building exercises, physical fitness, and other fun activities to build self-confidence and esteem.

The department maintains several cross-jurisdictional agreements. First, with the Jackson County Sheriff's Office pertaining to the School Resource Officer Program and law enforcement services outside the reservation boundaries. Secondly, with the Bureau of Indian Affairs through the 638 contract. All officers attend training and certification to be cross-deputized through BIA-Office of Law Enforcement Services. Finally, an agreement with the state of Kansas to operate the information terminals in the communications center through which the department enters and receives NCIC and other law enforcement restricted data.

Corrections – The Nation has 1 FTE Court Services Officer who serves in the capacity of adult probation officer headquartered at the Judicial Center. Adult prisoners are incarcerated at facilities operated by either Jackson or Brown counties in Kansas per negotiated contracts for jail services. The Nation has also incorporated an ankle gps/alcohol monitoring system to monitor domestic violence cases, stalking orders, and or alcohol related offenses. Juvenile detention is through outside state or county facilities determined upon the incarceration level necessary. Pre-trial, parole, and re-entry services, for juveniles or adults, are not available within the tribal community. Pre-trial monitoring for state/federal charges are provided by the state/federal court bringing charges. Offenders re-entering the reservation community from state or federal facilities are monitored by state or federal probation/parole respectively.

Tribal Victim Services – Over the past decade, the Nation has worked diligently to increase and enhance essential services to Native American victims of crime in northeast Kansas. TVS work is empowerment and strengths based, building upon existing resources and developing

collaborative approaches to increase effectiveness. Direct services for victims of crime generally include: on-scene crisis response; crisis hotline; assistance to meet immediate essential needs – food, shelter, clothing, safety, transportation; information, accompaniment, and support in navigating the tribal, state and federal criminal justice systems; assistance with crime victim compensation claims; case management; individual and support groups utilizing art as a healing modality; and other services as necessary. Additionally, the program coordinates the SAFESTAR (Sexual Assault Forensic Examinations, Services, Training, Advocacy, and Resources) volunteer program, and has a Victim Specialist stationed within the Law Enforcement and Tribal Prosecutor's Office. New programs recently implemented under the TVS are the T.R.A.C.K.S. (Traditions, Respect, Accountability, Change, Knowledge, and Safety) Batterer's Intervention Program and Safe Visit/Safe Exchange program, and staff are currently receiving training to become certified Tribal Court Lay Advocates through the National Tribal Trial College to provide lay advocacy services to victims and families within the criminal and civil Tribal Court system.

Social Services Department – The Social Services Department, established in June 1999, is an umbrella department encompassing multiple related programs which comprehensively address concerns threatening the health and welfare of tribal individuals, families, and the community as a whole. Programs include: the Community Health Representative Program, Adult Protective Services, Adult Social Work program, Child Protective Services, Foster Care Services, ICWA, Independent Living, and Vocational Rehabilitation Services. The programs work in tandem to comprehensively address the most serious health, welfare, and safety concerns of children, youth, adults, elders, families, and the community. The Social Services Department is centrally located on the reservation in the east wing of the Health and Wellness Center.

Prairie Band Potawatomi Health Clinic – The Health Clinic offers comprehensive preventative and wellness care including: routine exams for children and adults including gynecological exams and pap smears for women; and screening and counseling for high blood pressure, cholesterol, cancer, sexually transmitted diseases, immunizations, diet, and fitness. Treatment for chronic conditions is available by appointment during clinic hours. The pharmacy utilizes the IHS formulary with a few exceptions. Dental procedures normally provided by a family dental practitioner are provided at the dental clinic including: oral exams and cleanings, x-rays, sealants, fillings, extractions, and others. The Alcohol & Drug Recovery Program utilizes diverse treatment approaches including the bio/psycho/social model of addictive disease, self-help programs, motivational interviewing, strength-based methods and the Red Road approach. Staff emphasize reconnecting with community, culture, and spirituality as essential components of recovery. The Health and Wellness Center does not provide emergency sexual assault nurse exams (SANE) or any other type of emergency medical care. Community members must travel to Topeka to receive these types of services.

Boys and Girls Club of the PBPN – The Club’s mission is to assist in the development and enhancement of the spiritual, mental, emotional, and physical well-being of youth by providing a safe, positive place to learn and grow. The aim is to empower youth with the skills needed to face all types of challenges they encounter by encouraging positive attitudes, education, good sportsmanship, culture, and friendship. Proven principles of youth development to achieve the health, social, educational, vocational, character, and leadership development while influencing youth to choose healthy options and avoiding destructive forces such as alcohol, drugs, gangs, and criminal behavior are employed.

3. Describe the significant tribal justice, community safety, juvenile delinquency, and victimization issues facing the tribal nation and explain why these issues are the most pressing.

2014		2013		2012		2011		2010	
Dispatch Calls for Service		Dispatch Calls for Service		Dispatch Calls for Service		Dispatch Calls for Service		Dispatch Calls for Service	
Assault/Battery	13	Assault/Battery	16	Assault/Battery	17	Assault/Battery	23	Assault/Battery	16
Burglary	30	Burglary	13	Burglary	23	Burglary	24	Burglary	13
Child Abuse / Endanger	20	Child Abuse / Endanger	15	Child Abuse / Endanger	10	Child Abuse / Endanger	22	Child Abuse / Endanger	12
Criminal Threat	3	Criminal Threat	4	Criminal Threat	1	Criminal Threat	5	Criminal Threat	1
Disorderly Conduct	14	Disorderly Conduct	25	Disorderly Conduct	16	Disorderly Conduct	16	Disorderly Conduct	15
Disturbance Domestic	81	Disturbance Domestic	63	Disturbance Domestic	74	Disturbance Domestic	74	Disturbance Domestic	53
Disturbance Misc.	59	Disturbance Misc.	57	Disturbance Misc.	57	Disturbance Misc.	43	Disturbance Misc.	54
DUI	18	DUI	16	DUI	22	DUI	20	DUI	33
Harassment	6	Harassment	13	Harassment	8	Harassment	18	Harassment	8
Identity Theft	12	Identity Theft		Identity Theft	5	Identity Theft	5	Identity Theft	
Kidnap/Unlawful custody	0	Kidnap/Unlawful custody		Kidnap / Unlawful custody	1	Kidnap / Unlawful custody		Kidnap / Unlawful custody	2
Missing Adult	5	Missing Adult	1	Missing Adult	2	Missing Adult	1	Missing Adult	9
Missing Juvenile	4	Missing Juvenile	2	Missing Juvenile	9	Missing Juvenile	16	Missing Juvenile	10
Phone Harassment	5	Phone Harassment	1	Phone Harassment	1	Phone Harassment	3	Phone Harassment	3
Prowler	0	Prowler		Prowler	1	Prowler	2	Prowler	2
Robbery	0	Robbery	1	Robbery		Robbery	1	Robbery	
Runaway	14	Runaway	4	Runaway	12	Runaway	6	Runaway	5
Sex Offense	9	Sex Offense	6	Sex Offense	8	Sex Offense	12	Sex Offense	4
Stalking	3	Stalking		Stalking	1	Stalking	2	Stalking	
Suicide	4	Suicide	2	Suicide	2	Suicide	6	Suicide	5
Suicide Attempts	7	Suicide Attempts	7	Suicide Attempts	4	Suicide Attempts	15	Suicide Attempts	5
Threat	2	Threat	9	Threat	6	Threat	6	Threat	5

Table 1- PBP Tribal Dispatch selected call types in which tribal police response was requested for years 2010-2014

According to table 1 (above), for the years 2010-2014, Potawatomi Tribal Police officers responded to 85 assault calls, 59 harassment/stalking calls, 79 child abuse/endangerment calls, 39 sex offense calls, and 345 domestic disturbance calls in addition to 270 miscellaneous disturbance calls. As staggering as these numbers may seem in a community of not quite 1,500 individuals, reported incidents are but a fraction of the actual violence in the tribal community. While we have seen an increase in requests for law enforcement intervention in violent incidents, we have not seen a corresponding increase in the number of cases actually filed (table 2 below). In 2014, law enforcement filed reports on only 30% of the domestic disturbance calls for service and only 33% of sexual assault calls for service. The tribal police attribute this to the community becoming more comfortable with seeking help early during an incident giving police time to respond and intervene prior to behaviors escalating to the level of physical injuries being sustained. This indicates our outreach and awareness activities, and

Prairie Band Potawatomi Nation
Tribal Community and Justice Profile Part B: Tribal Narrative Profile

2014		2013		2012		2011		2010	
Police Reports - Selected Offenses		Police Reports - Selected Offenses		Police Reports - Selected Offenses		Police Reports - Selected Offenses		Police Reports - Selected Offenses	
Arson	0	Arson		Arson		Arson	3	Arson	4
Assault	9	Assault	22	Assault	14	Assault	16	Assault	8
Burglary	19	Burglary	12	Burglary	8	Burglary	9	Burglary	4
CINC	13	CINC	5	CINC	4	CINC	15	CINC	
Criminal Threat	1	Criminal Threat	1	Criminal Threat	6	Criminal Threat	3	Criminal Threat	1
Disturbance Domestic	24	Disturbance Domestic	19	Disturbance Domestic	19	Disturbance Domestic	17	Disturbance Domestic	26
Disturbance Misc.	15	Disturbance Misc.	11	Disturbance Misc.	0	Disturbance Misc.	8	Disturbance Misc.	4
DUI	17	DUI	15	DUI	21	DUI	21	DUI	29
Homicide	0	Homicide		Homicide		Homicide	1	Homicide	
Identity Theft	11	Identity Theft	2	Identity Theft	1	Identity Theft	2	Identity Theft	2
Kidnapping	0	Kidnapping		Kidnapping		Kidnapping		Kidnapping	1
Missing Juvenile	2	Missing Juvenile	2	Missing Juvenile	3	Missing Juvenile	1	Missing Juvenile	1
Phone Harassment	0	Phone Harassment	2	Phone Harassment	1	Phone Harassment	4	Phone Harassment	3
Sex Offense	4	Sex Offense	2	Sex Offense	5	Sex Offense	3	Sex Offense	5
Suicide	1	Suicide	1	Suicide	1	Suicide	4	Suicide	1
Suicide Attempt	2	Suicide Attempt	1	Suicide Attempt		Suicide Attempt	5	Suicide Attempt	

Table 2- Prairie Band Potawatomi Tribal Police official reports for selected offenses for years 2010-2014

program building, through prior DOJ funding, is having an impact. The community is seemingly more aware of services available and are seemingly becoming more comfortable with requesting assistance during or after a crisis event through law enforcement channels. We have also seen community members be more forthcoming with disclosing historical incidents of violence against them or a loved one. Many times, TVS staff has been out in the community, at outreach events, conducting groups, or even just visiting with someone at the convenience store and an individual will disclose having been assaulted or witnessing an assault as a child or young adult which is a huge step in the healing process for that person.

The violence on the reservation is exasperated by social issues that include nearly 73% of families with children under the age of five living below poverty level, over 36% of adults are either unemployed or not in the labor force, and 8.3% of the of the population fails to graduate high school or complete a GED.⁴ A 2012 Royal Valley School District (the primary school district serving the community) report indicated that nearly two-thirds of tribal youth were involved in

⁴ 2010 US Census Summary Files for Prairie Band Potawatomi Nation Reservation DP02 Social Characteristics and Summary File DP03 Selected Economic Characteristics

risk-taking behaviors such as alcohol use, binge drinking, smoking, using inhalants, using marijuana, sexual activity, shoplifting, vandalism, physical aggression, and group fighting. In 100% of child in need of care cases, alcohol and/or drug use by the custodial parent is identified as a problem; over 25% of all police calls involve alcohol and/or drugs; and 90% of all criminal cases within the tribal court system are alcohol or drug related.

Alcohol and drugs enable a powerful force that destroys the personal journeys of many Tribal members, create dysfunction in the home, decrease the normal inhibitions of the user and ultimately, crimes committed under the influence are more serious and severe in nature.

2014		2013		2012		2011		2010	
Flagged Cases		Flagged Cases		Flagged Cases		Flagged Cases		Flagged Cases	
Involving Alcohol	57	Involving Alcohol	82	Involving Alcohol	76	Involving Alcohol	81	Involving Alcohol	93
Involving Drugs	66	Involving Drugs	83	Involving Drugs	97	Involving Drugs	65	Involving Drugs	74
Involving Juveniles	28	Involving Juveniles	48	Involving Juveniles	22	Involving Juveniles	18	Involving Juveniles	26
Involving Weapons	4	Involving Weapons	16	Involving Weapons	15	Involving Weapons	20	Involving Weapons	3
Involving Mental	8	Involving Mental	5	Involving Mental	4	Involving Mental	1	Involving Mental	4

Table 3: Tribal Police Cases Flagged program years 2010- 2014

Based on table 3 (above), for year 2010-2014, more than one in four of all Tribal Police cases involved alcohol or other drugs. However, this is down over the past year. Tribal Police attribute this to their increased focus on methamphetamine interdiction and improved collaboration with casino management. We also saw a spike in the number of cases involving juveniles in 2013. We believe the spike in juvenile cases is attributable to the establishment of the SRO program within the Royal Valley Schools that year, and an agreement which allows juvenile cases involving tribal youth, which stem from an incident at the off-reservation school, to be handled by our law enforcement and not the county sheriff’s office. Despite the spike, we believe this to be a positive change in that we are able to address our youth within the tribal community without “losing” them to the non-tribal systems.

The Nation's goal for the proposals submitted through the CTAS is in-line with the Nation's established Vision Statement: *As a sovereign Nation we shall strive to provide an environment of improved well-being for our people including education, health, safety, and welfare while valuing our culture, traditions, and all resources.* Through the projects proposed, the Nation will strengthen tribal justice and community-based systems to ensure a comprehensive, coordinated response that focuses on prevention across the life-span and provides for seamless accountability of offenders while ensuring victim safety. The objectives:

- Increase tribal law enforcement's capacity to effectively respond, and prevent and control crime, ensuring victim safety and offender accountability through the provision of equipment and training;
- Engage in collaborative and strategic planning efforts to address the community's most serious crime and victimization concerns that will increase victim safety and support and increase offender accountability;
- Continue and enhance culturally-based tribal justice system responses to crime, particularly alcohol/drug related crime, through the established Adult Healing to Wellness Court and the development of a Juvenile court including probation, Healing to Wellness, and supervision to increase offender accountability and healing opportunities;
- Increase quantity and quality of culturally specific prevention, awareness, and education programming intended to prevent perpetration of violence in the tribal community.

4. Describe current and future plans to comprehensively address the tribe's public safety, criminal and juvenile justice, or victimization issues.

Current efforts to address the Nation's public safety, criminal and juvenile justice, and victimization concerns are multi-fold. Within the Tribal Court, the Nation has successfully

developed the PBP Nation Judicial Council as an independent branch of government which includes the Peace Makers Circle, the Healing to Wellness Court, civil and criminal justice and most recently juvenile court. The Nation has enacted a Victim's Rights Code – the first tribal code in the state of Kansas. Within the Tribal Police Department the Nation has developed patrol and investigations as well as a 24/7 communications center, and sex offender registration. The Nation has sustained prevention activities in the Police Department Explorers Program and Boys & Girls Club by incorporating life skills classes beginning at age 5, including teaching positive male influence while the kids learn the responsibility to make positive healthy choices. The Judicial Center has an established and recently redesigned Adult Healing to Wellness Court, and is in the process of including a Juvenile Healing to Wellness Court program with funding requested here, that comprehensively addresses substance abuse treatment needs of the mind, body, and spirit for both adult and juvenile offenders. The Nation, through the Tribal Victim Services and SAFESTAR programs, built programming to assure victims of domestic violence, sexual assault, stalking, and other violent crime receive the direct and longer-term support necessary to immediately increase safety and begin recovery.

As a part of this CTAS proposal, funding is requested to sustain and enhance new and existing efforts to comprehensively address the Nation's public safety and victimization issues. Through requested funding the Nation will: assure tribal law enforcement has the equipment and training necessary to prevent and control crime and respond to urgent calls for service; implement a comprehensive strategic planning period which focuses on the tribal justice system and specifically considers the impacts of the Tribal Law and Order Act and the tribal provisions of the 2013 Violence Against Women Act; continue and enhance the Healing to

Wellness Court; and fully implement the Nation's Juvenile Justice code and juvenile systems necessary to respond and rehabilitate juvenile offenders.

It is expected, the strategic planning process we are requesting funding for will identify gaps and further inform future justice system plans. At this time, future plans include: establishment of a Domestic Violence Court within the PBP Tribal Court; planning and development of a Family Justice Center; juvenile and adult detention facilities; and offender re-entry mentoring.

5. Discuss any additional information about your Tribe that would be important in the understanding and evaluation of your application.

The PBPN has made the long-term commitment to improve the quality of life for its members and the residents of the reservation community who suffer with the same disparities encountered in many tribal communities nationwide. The Nation has committed significant time, energy, resources, and efforts toward reducing crime; toward taking a stand against violence against women, children, and the elderly; and toward steadfastly protecting its inherent sovereignty by continually increasing capacities to exert jurisdiction as defined in the constitution. Law and order are key components of any capable jurisdiction and the PBPN has made great strides in increasing capacities in all components of its justice and related systems. There is more work to be done however. Without federal assistance we are unable to continue moving forward in planning and implementing strategies to comprehensively address the most serious crime, prevention, and victimization issues we face.

Oversight of Federal Award Funds: The Nation manages many successful federal grant and contract programs to improve the quality of life for Tribal members and the surrounding community including: Head Start and Child Care Program; Senior Meal Program and Caregiver Services; Foster Care; USDA Food Distribution Program; BIA Road and Bridge Program; Health

Clinic; Alcohol & Drug Program; and Diabetes Prevention to name a few. The Nation has structured the Finance Department using generally accepted accounting practices in accordance with OMB Regulatory guidance and 2 CFR Part 200.

Financial Management: The Tribal Treasurer is an elected tribal official with the responsibility of the Comptroller who supervises 21 FTE finance staff. The Finance Department ensures the financial management policy is honest, fair, and objective with sound principles and accountability of tribal resources. The department includes a Grants and Contract Specialist who maintains generally accepted accounting practices in accordance with OMB guidance and 2 CFR Part 200 to ensure that grant programs meet or exceed all program requirements, including timely submission of financial reports. For the past several years, the Nation has received audits with no findings related to DOJ awards.

Procurement: The Finance Department has a centralized Purchasing Department. Purchasing is comprised of three (3) general agents with authority to make such purchasing arrangements as are usual and necessary. Purchasing follows policies that meet 24 CFR part 85 and 24 CFR 1003, and are honest, fair, and objective in allowing feasible and practical competition among the general public. The purchasing policy specifically states all purchases shall be processed through the Purchasing Department and must be handled in accordance with procedures as established in the PBPN Purchasing Manual.

Travel: The Nation has established travel policies which are cost beneficial to the PBPN, remain in compliance with federal regulations, and provide the maximum insurance coverage to the PBPN and traveler. All travel is arranged through a centralized Travel Clerk and travel costs including per diem is paid in-line with current GSA rates.