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**DISCUSSION PAPER PREPARED FOR:** 

Alaska Venture Fund

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# Purpose and Background

### **Project Purpose**

The Denali Commission was established by federal law in 1998 to improve conditions in rural Alaska. While much has changed in the intervening 25 years, the needs in rural Alaska remain as urgent as they were - and the Denali Commission is uniquely positioned to make a difference.<sup>1</sup>

This project posits that the Denali Commission's effectiveness and impact can be strengthened through deeper integration and partnership with rural Alaska communities and Alaska Native Tribes. This discussion paper seeks to inform and inspire constructive dialog about deepening the commission's ties to the rural Alaskans at the heart of its mission.

#### Methodology

Alaska Venture Fund, a nonprofit organization with a mission to create a more sustainable future for Alaska, contracted with McKinley Research Group (MRG) to gather and synthesize ideas from a range of voices. MRG staff interviewed 30 individuals in spring of 2023, including several current and past Denali Commission commissioners. Interviewees are listed in Appendix 1.

### Why now?

This year marks 25 years since the establishment of the Denali Commission in federal law. While the law has undergone periodic updates, this quarter-century mark is a timely opportunity for big-picture reflection on the commission's structure and approach, particularly in light of increasing recognition of Alaska Native Tribes and the opportunity presented by significant recent federal appropriations.

#### **EVOLVING ROLE OF TRIBES**

Among other shifts since 1998, recognition of the power and potential of Tribes has grown across Alaska. As one interviewee said, "We have a different understanding now than we did in 1998 of tribal authorities and the rights of Alaska Tribes." Tribal health care has become a

<sup>&</sup>lt;sup>1</sup> There is significant evidence of need for infrastructure aid in rural Alaska. For example, GAO-22-104241 *Alaska Native Issues: Federal Agencies Could Enhance Support for Native Villages to Address Environmental Threats* (May 2022) found more than 70 of 200 Alaska Native villages face significant environmental threats from erosion, flooding, or thawing permafrost. <a href="https://www.gao.gov/products/gao-22-104241">https://www.gao.gov/products/gao-22-104241</a>.

significant force; Tribal compacting is gaining ground; Tribes have gained official state recognition; and Tribes are reasserting rights in child welfare, language, resource management, and other areas. Federal direct funds to Tribes are increasing. In many places in Alaska, Tribes function as the local government.

While "rural" and "Tribal" are not synonymous, the population of rural Alaska – particularly the smallest, most remote communities – is predominantly Alaska Native. Some estimates indicate 82% of Alaska's remote rural population is Alaska Native/American Indian.<sup>2</sup> The Kusilvak Census Area in western Alaska, for example, has no "hub" community and is 92% Alaska Native/American Indian according to 2021 US Census estimates.

There is value in reflecting on how the Denali Commission and Alaska Native entities can rethink partnerships to better understand and meet current and future needs in rural Alaska.

#### FEDERAL FUNDING OPPORTUNITIES

Further increasing the urgency of effective partnership are generationally significant appropriations in recent federal spending bills. Rural Alaskans across the state express excitement about the potential for addressing long-needed infrastructure and services - and

apprehension about their capacity to access these funds. Funding entities likewise express concerns about their capacity and ability to effectively and equitably grant this influx of important funding.

The scale of the challenge is equal to the scale of the opportunity and invites new and emergent thinking about partnership. As described in this paper, the Denali Commission has potential to function as a critical connector between funders and projects, helping to efficiently and effectively channel funding to where it is most needed.

"By creating the Commission,
Congress intended for those
involved in addressing the unique
infrastructure and economic
challenges faced by America's
most remote communities to work
together in new ways to make a
lasting difference."

-Denali Commission 2022 Agency Financial Report

<sup>&</sup>lt;sup>2</sup> Alaska Native Policy Center. Chapter 3: Alaska Native Population in Our Choices Our Future. 2004. https://firstalaskans.org/wp-content/uploads/2014/03/ANPCa3.pdf. A state demographer suggests this estimate, while dated, is unlikely to have changed significantly (personal communication).

### **Denali Commission Background**

#### **Commission Purpose**

The Denali Commission Act of 1998, by the late Senator Ted Stevens, established the commission as a federal agency with the following purposes in law:

- (1) To deliver the services of the Federal Government in the most cost-effective manner practicable by reducing administrative and overhead costs.
- (2) To provide job training and other economic development services in rural communities, particularly distressed communities (many of which have a rate of unemployment that exceeds 50 percent).
- (3) To promote rural development, provide power generation and transmission facilities, modern communication systems, water and sewer systems and other infrastructure needs.

In its 2022 Agency Financial Report, the Denali Commission describes its mission as follows:

The mission of the Denali Commission is to provide infrastructure, job training and to support economic development. The Commission was established with a specific focus on promoting rural development in the following areas: bulk fuel storage, power generation, health care facilities, surface transportation and waterfront facilities, communication systems and specialty housing (e.g., domestic violence shelters). In executing the mission, the Commission strives to deliver services in the most cost-effective manner possible.<sup>3</sup>

#### **Commission Structure**

As set out in authorizing legislation, the Denali Commission is run by a federal co-chair designated by the U.S. Secretary of Commerce. The federal co-chair is a fulltime employee of the Department of Commerce and has day-to-day responsibility for running the commission.

The Governor of Alaska serves as state co-chair<sup>4</sup> and five Alaskans by position serve as commissioners:

- President of the University of Alaska
- President of the Alaska Municipal League

https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2023/03/AFR-FY22-FINAL.pdf

<sup>&</sup>lt;sup>3</sup> Denali Commission Agency Financial Report (AFR) FY 2022.

<sup>&</sup>lt;sup>4</sup> The Governor has typically delegated this responsibility to a cabinet member or senior staff member.

- President of the Alaska Federation of Natives
- Executive President of the Alaska AFL-CIO
- President of the Associated General Contractors of Alaska

Commissioners meet at least twice a year to develop and monitor annual work plans that guide the agency's activities.

While the Denali Commission is one of five active federal regional commissions and authorities, it is unique in several ways. Notably, the Denali Commission is the only single-state commission, and the only one to rely primarily on federal funding for both administration and activities.<sup>5</sup>

Unlike other commissions, its staff are all federal employees. There are currently 13 staff members including the federal co-chair. The Denali Commission's offices are located in Anchorage.

#### **Funding and Activities**

Over its history, the Commission has awarded more than \$2 billion in grants for more than 1,400 projects. Projects address a range of needs including energy, transportation, and health care.<sup>6</sup> From Fiscal Years 2004 through 2008, the commission received average annual appropriations of nearly \$130 million. Commission funding dropped significantly in the following years, with annual appropriations ranging from \$10 million to \$15 million through FY 2021 (with the exception of \$30 million in FY 2018). In FY 2022, the commission experienced a five-fold increase in funding, to \$90 million.

<sup>&</sup>lt;sup>5</sup> Congressional Research Service. Federal Regional Commissions and Authorities: Structural Features and Function. R45997. May 18, 2022; and Congressional Research Service. Federal Regional Commissions and Authorities: Administrative Expenses. July 15, 2022.

<sup>&</sup>lt;sup>6</sup> Denali Commission. *Denali Commission Performance and Accountability Report, Agency Financial Report Fiscal Year 2022.* Anchorage, AK, November 2022. <a href="https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2023/03/AFR-FY22-FINAL.pdf">https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2023/03/AFR-FY22-FINAL.pdf</a>

# Context: Federal Policies, Rural and Cultural Realities

To understand the purpose of this discussion paper, it is important to consider the everyday challenges rural Alaska contends with - and why federal efforts to help often miss the mark.

While federal money may appear to be plentiful, it can be extremely hard for rural Alaska communities to access. The disconnects run deep. Many interviewees said federal agency programs are not designed to meet the needs of rural Alaska. One said, "Decision makers live outside and enabling legislation is designed for the average municipality in the Lower 48."

Federal studies give credence to such claims. For example, a 2022 report by the U.S. Government Accountability Office (GAO) reviewed federal efforts to help Alaska Native villages address environmental threats. The report found that "much more needs to be done to protect" these villages from threats such as erosion, flooding, and thawing permafrost. The report noted:

Of the more than 30 federal programs that could help, most are hard for Native villages to access. For example, programs that require participants to share costs with the government can be out of reach for small villages.<sup>7</sup>

The GAO report recommended agencies remove obstacles and barriers to help Alaska Native villages obtain federal assistance.

Interviews for this project helped shed light on why such changes are needed, and how very challenging the barriers are. For example, even something as ubiquitous as the internet is problematic for many rural Alaska communities.

"Everything is on the internet, and we lack broadband internet," said a former tribal administrator. "We were trying to get a CARES Act report in and before everything was uploaded we lost our internet and had to start over." This can make applying for funding feel like a circular logic problem: How does one get broadband when the application for broadband funding requires reliable internet service?

One administrator devised an emergency workaround through a consultant in urban Alaska: "When we needed to get stuff submitted, I was able to work with [the consultant] by fax and they

<sup>&</sup>lt;sup>7</sup> GAO-22-104241 Alaska Native Issues: Federal Agencies Could Enhance Support for Native Villages to Address Environmental Threats (May 2022). https://www.gao.gov/assets/gao-22-104241.pdf

could submit it using their broadband." However, retaining a competent and reliable consultant requires money and coordination beyond the reach of some villages.

A more subtle challenge is competition. Many funds are distributed to rural communities on a competitive basis, or on a priority-list system. This system inherently favors communities with grant writing skills and resources - which may not align with need.

One former tribal administrator expressed a sense of hopelessness in getting their village's needs to the top of agency priority lists. "It's difficult for communities as small as ours to compete."

"We need to figure out how to reduce the level of competition around money... We see it on the micro-level when a family member dies, and it changes people, and tears families and communities apart."

In addition to fairness concerns, the system can take a toll on relationships, and can undermine long traditions of cooperation between neighboring communities. One interviewee said grant competition pits small communities against each other - often for small amounts of money. "It's like having a pack of wolves go after scraps."

A tribal leader in a 400-person village compared the situation to tiny village schools playing the biggest teams

in basketball: "We have shovel-ready projects, but we're competing against giants. It's like 1A teams playing against 4A teams."

Some communities get help from larger entities. But this can have costs as well. One tribal administrator said that by the time funds make it to their village, much has gone to intermediaries: "We could apply for a \$100,000 grant but by the time it reaches us it's so diminished because of other agencies taking cuts. And for our small village, we're lucky to get \$15,000 to run our office."

In many villages, a tribal coordinator or other position will assume duties far beyond typical administrative tasks, such as village safety, emergency repairs, and utility operations. Capacity in a small remote village for grant writing is limited, and many said it is not realistic to expect these small communities to have the time and tools to compete.

An interviewee from a regional organization said they appreciated set-asides in many funding streams for underserved communities, but it's not enough:

The foundation has not been laid for Tribes and communities to be able to use the funding. You have to be a grant writer. The money might be available to work on the project you need, but if none of the training or technical assistance or capacity building has been done, you see a grant and it's like, 'Ok cool, I have no idea how to tackle that.'

The need for ongoing and individually tailored technical support is acute. Yet federal agencies themselves often lack capacity to provide the level of support needed.

In sum, there is both *need* for funding in rural Alaska and *availability* of federal funds for rural Alaska, but capacity constraints on both sides threaten to undermine the impact of these funds. Interviewees expressed concern that there is a real risk of rural Alaska needs going unmet while funds intended to address those needs go unspent or are poorly spent.

Many interviewees said the Denali Commission could play a unique and valuable role in averting such an outcome and helping ensure real impact of "Federal agencies can be just as starved for capacity - particularly this 'soft skills' set of coordination and planning. It's one thing to have a whole bunch of federal money for construction or engineering, but if you don't have capacity for the planning, the facilitation of the EIS's and community engagement, then you can end up not only making a lot of mistakes but leaving people out in the cold just when they really feel as though they have the voice that could be relevant."

federal funds in rural Alaska.<sup>8</sup> Given its mission, experience, and statutory powers, there is arguably no agency better situated than the Denali Commission to help bridge the disconnect between federal policy and rural Alaska reality.

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<sup>&</sup>lt;sup>8</sup> The GAO report referenced at the beginning of this section concurs (GAO-22-104241). Among its recommendations: "The Denali Commission's Federal Co-chair should identify options for providing additional technical assistance that is specifically designed to help Alaska Native villages navigate and obtain assistance from the variety of potentially available federal programs, including by assessing how the Commission prioritizes its available resources."

# Value of Denali Commission

This section summarizes the value interviewees see in the commission.

# **Unique Role**

The Commission is the only federal agency with a mission focused on rural Alaska needs, and virtually all interviewees saw the commission as a valuable tool. One interviewee said, "Our state is so rural and so big that there absolutely is a place for a Denali Commission that is operating on all 8 cylinders."

Many cited the commission's successes. The most frequently cited achievements were the bulk fuel storage program (the commission's first major program) and construction of village health clinics in partnership with Alaska Native Tribal Health Consortium.

Another lauded the "phenomenal work" of the commission in advancing relocation of the village of Newtok amidst a panoply of bureaucratic hurdles, saying, "State and federal agency programs and policies were prohibitive and the Denali Commission stepped in to remove the barriers as best they could."

One interviewee said that while most federal funding programs are designed with little thought to or understanding of rural Alaska, "The Denali Commission on the whole is far more effective at investing resources in a way that has a tangible benefit to communities on the ground."

"Ted Stevens got a pretty unusual piece of legislation adopted to really make it easier to connect state and federal agency work in a way that reduces some of the bureaucracy. It is an important thing to continue."

### **Unique Flexibilities**

Many interviewees noted the Denali Commission has several powers and flexibilities that are unusual among federal agencies.

Ability to turn lapsing money into "no-year" money

While most federal agencies receive time-limited appropriations, the Denali Commission's monies do not lapse or expire. In the federal funding lexicon, this means money appropriated to the commission becomes "no-year" money - even if it is transferred to the commission from an agency where money has a lapse date. As many pointed out, this is a crucial tool. In a time of glut - which Alaska is arguably entering - it means monies can be appropriately paced. This could

enable the commission to help smooth out funding, providing funders an opportunity to slow down and do a better job of prioritizing, vetting, and supporting projects.

One interviewee gave an example of a federal agency that is turning over a chunk of money from another "highly bureaucratic" federal agency to the Denali Commission to gain flexibility: "We can turn it into no-year money and then slowly take the time to develop it effectively." According to the interview, this partnership with the commission will enable managers to accomplish much more with the money.

#### Ability to comingle different funding streams

Several interviewees suggested the Denali Commission's relative flexibility could enable it to serve as a funding aggregator for projects with mixed federal funding streams.

The commission can also fill in gaps, as one interviewee said it did for Newtok's relocation: "[The Denali Commission] used their funding, which was not as limited as other federal agencies, to fill the gaps that were preventing other state and federal agencies from implementing what the Tribe needed."

"For example, how do you get [Natural Resources Conservation Service] money to come into the same space as [US Forest Service] money and do some collaborative food security with tribes? A lot of times there is bureaucratic dysfunction trying to mingle the funds. I feel like because of their flexible financial authorities, the Denali Commission could be a good entity for doing that."

#### Ability to provide "nonfederal" match

Also key is the Denali Commission's ability to provide money that typically counts as non-federal match (regardless of its original source) for the purposes of meeting grant requirements. Providing matching funds helps communities that are unable to raise that money locally and enables Denali Commission dollars to go further than if the commission paid for 100 percent of a given project. Interviewees noted that systems would need to be developed to address cash flow complexities involved in providing match funding at the right time. "This will take staff that know the communities, know the players in rural Alaska and how to incentivize partnerships."

#### Ability to right-size requirements

As described in the previous section, federal grant requirements can be notoriously onerous, particularly for small remote communities where a tribal administrator may maintain the water system and fill in as a peace officer, and where basic amenities are often lacking. As one interviewee said, "Some of our grantees have to climb a hill to get a cell signal to make a call or turn things in at the beginning of the month before the internet is shut off."

The Denali Commission is less burdened than other federal agencies by rules that don't make sense for rural Alaska. The commission has the power to adjust or "right-size" requirements to minimize the barriers rural communities face in getting the funding they need.

# **Barriers to Optimal Partnership**

This section summarizes limitations and barriers to optimal partnership identified by interviewees.

#### Limited resources

"The commission is under-resourced," one interviewee said, reflecting widely expressed belief that recent annual budgets of \$15-20 million greatly constrained the Commission's ability to meet its mission.

With larger budgets on the horizon, interviewees said expanded staff capacity at the Commission will be essential to provide communities the support they need, and to ensure funding is distributed equitably and effectively.

#### Lack of awareness

In part due to low annual budgets and limited activity, many people are unaware of what the commission does or how to engage with it. One tribal leader said: "I thought it was kind of defunct organization. It's almost like it went into ghost status. I don't get any solicitations or requests for meetings. I didn't even know they still existed."

A few tribal leaders reached in rural Alaska said the name sounded familiar, but they did not know what it was.

#### Limited public or Tribal engagement processes

Several interviews described the commission as a product of its times. Conceived in the 1990s by the late Sen. Ted Stevens, its statutory structure and language provide for limited engagement with rural Alaskans in commission decision making.

"It's not a grassroots effort right now, it's coming down from people that live in the city and maybe people who have not lived in the rural communities."

Many interviewees lauded commission staff for their caring, dedication, and knowledge of rural Alaska. However, when asked, "How do Tribes and Alaska Native organizations interact with the commission and influence commission decisions?" almost every interviewee paused and offered some version of, "I'm not sure." Or as one Alaska Native leader said, "That's something I have been trying to figure out."

Many government agencies have developed or are creating structures and systems to give key constituencies a voice in decision making, such as Tribal consultation, regional advisory committees, and Tribal liaisons. The Denali Commission does not have robust mechanisms or requirements for engaging rural Alaskans.<sup>9</sup>

#### Limitations of Commission composition

Only one of the seven statutorily designated seats governing the Denali Commission is for an Alaska Native entity. As a whole, Commission members do not reflect the Commission's core constituency, and the interests of designated agencies may not always align with the needs and interests of rural Alaska communities.

In addition, by definition, Commission members are heads of major statewide organizations with a variety of demands on their time. They are busy people who may not be able to provide uniquely focused attention and leadership to the needs of the Commission.

Finally, designating specific agencies in statute - especially nongovernment entities - may not be durable as policy. Agencies' interests and structures may change over time and may not remain relevant to the commission in perpetuity.

#### Competitive funding mechanisms

Many interviewees expressed a need to consider the ramifications of the competitive grant processes the Denali Commission has recently employed to distribute the bulk of its funds. While there is recognition that non-competitive processes pose a risk of favoritism, many said the current system is a barrier to getting important needs met and should be reconsidered.

#### Reluctance from other federal agencies

Many interviewees expressed a wish that more federal agencies would recognize the value of partnering with the commission to effectively deploy funds for rural Alaska. Interviewees cited institutional resistance to change and a lack of awareness or understanding about how the commission works as reasons federal agencies have not made more use of the Denali Commission as a partner.

<sup>&</sup>lt;sup>9</sup> The Commission does have a public input process for its workplan. For a variety of reasons, it does not appear to be highly effective. Commission leadership explained the process: "A draft [workplan] is published in the Federal Register and is available for comment for 30 days. We also hold a call-in session for members of the public to offer their opinions directly to the Commission every year. After that comment period, the final version of the workplan is again published in the Federal Register for another 30-day comment period. We usually receive no comments during this process."

# Ideas for Boosting Tribal and Rural Partnership

Suggestions for how the Denali Commission might more effectively partner with Tribes and remote communities ranged from easily implemented changes to those that would require Congress to amend enabling legislation. The ideas below are not prioritized or vetted, and some are alternative ideas for approaching the same challenge. All ideas are shared with the intent of sparking creative thought and constructive conversation.

#### **Structure**

#### **Rethink Commission composition**

Many interviews suggested rethinking or restructuring the composition of the commission to better reflect its constituency. Suggestions included:

- Increase Alaska Native and rural representation on the commission. One person suggested "flipping" the commission from Alaska Native minority to majority.
- Keep the existing commissioners and increase the size of the commission by adding seats for more Alaska Native entities.
- Establish a Tribal co-chair to complement the existing state and federal co-chairs.
- Designate commission seats for regional representation.

With any such changes, consideration should be given to term length and staggered seats.<sup>10</sup>

#### Expand use of advisory committees

Advisory committees could be structured in various ways.<sup>11</sup> Interviewees suggested, for example:

- Regional advisory committees
- Program-specific advisory committees (may be time-limited to match a particular program)

<sup>&</sup>lt;sup>10</sup> A variety of models can be found among Alaska's 135-plus active boards and commissions. https://gov.alaska.gov/services/boards-and-commissions/active-boards-commissions/

<sup>&</sup>lt;sup>11</sup> The Commission has one Advisory Committee listed on its website, a Transportation Technical Advisory Committee with eight members listed.

Topic-specific advisory committees

Such committees could also be used to make some fund allocation decisions. One interviewee said the Commission once set up a village roads committee to allocate \$200 million for rural roads: "The Denali Commission delegated entire responsibility for allocating and spending that money to this group. That was a really great model, people liked that."

## **Engagement and Outreach**

#### Institute a consultation process

Consultation requirements would ensure a formal means for Tribes or other designated entities to provide feedback to the commission. Many Alaska communities and Tribes are familiar with this process with other federal agencies.

"Over the years the Tribes have grown exponentially and especially through executive orders for tribal consultation, they've grown politically stronger. I think there needs to be a lot more connection to working with Tribes. In villages like ours the Tribes run most everything. We provide community centers, transportation programs, we run the health care system."

#### Solicit public input on workplan

Although there is a public comment process, several interviewees suggested there is little review or input on the agency's annual workplans, which serve as its guiding documents. More robust public outreach and engagement with the workplan could benefit the commission by raising awareness of its activities and capabilities among the public and among state and federal agencies.

#### Increase the number of Alaska Native staff

Several people said increasing the presence of Alaska Native staff at the commission would be win-win for communities served and the commission in fostering understanding, dialog, and trust.

"There's a lot that's been written about meetings, even consultation meetings. How the room is arranged matters. Who holds the mic matters and determines how long people get to talk matters in perpetuating existing inequitable power structures. It would be interesting not just to ask how they might restructure the Denali Commission but to give [rural stakeholders] a role in defining the processes the commission uses."

#### Consider details

Some interviewees noted that the way meetings are structured can make a big difference in whether people feel welcome and heard. Giving extra care, and asking stakeholders for help in designing outreach or advisory processes can build good will and make those efforts more effective.

#### Expand outreach and social media presence

Many interviewees suggested increasing outreach to let people know what the commission is, what it has to offer, and how people can engage. Suggestions include more community visits by staff and/or commissioners, attendance at meetings and events, and presentations.

Social media could be part of expanded outreach efforts. Despite connectivity challenges, Facebook, Instagram, and Twitter are important means of building connections and sharing information in rural and Tribal Alaska. One interviewee said, "Having a relatable presence on social media could be helpful. [Denali Commission] could build connections that way and open up some dialog."

#### Regionalize efforts

Several interviewees suggested decentralizing commission staff to better understand and connect to communities' strengths and needs. This model might embed staff in different regions of the state. Regional advisory groups, noted above, are another means of increasing communication and understanding of rural needs in a state where Anchorage feels worlds apart from some remote villages.

#### Increase transparency

Several ideas were offered to strengthen relationships and trust with the public by increasing transparency at the commission. Suggestions included developing a data dashboard showing where Denali Commission funding is going and creating an annual "report card to the public."

#### Track community assets/needs

It was suggested the commission do an assessment or scan of needs in all villages using 10-15 indicators (e.g., does the community have a post office, school, public safety building, water/sewer, broadband, grocery store, etc.). This data could be used to build an interactive dashboard to help communities and government entities identify needs and address inequities. Denali commission grants and investments could be included in the dashboard.

### **Fund Distribution**

#### Reduce use of competitive processes

For reasons described throughout this paper, many interviewees suggested shifting away from competitive grant processes to processes based on community risk and need. Data dashboards could potentially inform alternative processes, as could other ideas noted in this paper, such as regional or program-specific advisory groups.

#### Tranche money and adjust requirements

Short of giving up competitive processes, ideas for helping level the playing field include establishing tranches of money within programs for villages of different sizes to ensure the smaller communities are not left behind. Requirements for smaller communities could be adjusted to better reflect the capacity and resources in smaller communities.<sup>12</sup>

#### Be flexible

Work with communities to develop customized projects to meet unique needs. Many interviewees said flexibility and direct engagement in project design were keys to successful past Denali Commission efforts.

"In an ideal world [the commission] would communicate with us directly on projects that might be unique to our village that don't fit under another umbrella, where we get disallowed for funding because we don't fit under an existing category. Especially in the renewable energy realm - each situation is different. If that lens weren't super stringent and things could be worked out on a case-by-case basis, I think that would be the way to go."

#### Simplify grant processes

Although the Denali Commission's grant processes are simpler than many federal grant processes, they still present barriers for some communities and projects. Interviewees said grant processes (competitive or non) should be simplified to reduce grant writing, compliance, and reporting burdens on fund recipients and applicants. One interviewee recommended the Rasmuson Foundation as a model for streamlined and accessible grant processes.

#### Consider compacting

As Tribal compacting gains ground in Alaska (for example, in health, education, and justice), several interviewees suggested the commission use compacting. Under negotiated agreements with a state or federal government, compacts offer a way for Tribes to exercise their sovereignty, autonomy, and authority in the efficient delivery of services to Tribal members, particularly in rural areas of Alaska where state and federal services are minimal and hard to deliver.<sup>13</sup>

#### Use money as match

While the Commission has done this in the past, the practice could be expanded to further leverage Commission dollars. As with other suggestions, this undertaking might require increased staff capacity.

<sup>&</sup>lt;sup>12</sup> We note the Commission provides extra points to communities labeled as disadvantaged by the Biden Administration or economically distressed by the Commission's definition, and to communities that are environmentally threatened.

<sup>&</sup>lt;sup>13</sup> This definition is adapted from the Alaska Governance Project, an initiative of North Star Group.

## **Supports**

#### Provide investment-level technical assistance

One interviewee said, "Focus on supports, not reports." There is enormous need for active, hands-on technical support in rural Alaska in project planning, grant writing, grant management, and reporting. Interviewees also recognized that the commission itself needs significantly more resources and capacity to do this effectively.

Specific suggestions for concrete supports include:

- Provide clear checklists about eligibility and timelines for Denali Commission programs.
- Upload or submit applications and reports to agencies for villages with limited broadband.
   This might be accomplished by providing a centralized phone and fax number and human support.

"If you have a small Tribe trying to apply for money, it's not always culturally appropriate for people to aggressively seek out the help they need, so there needs to be more proactive help for them."

Interviewees suggested Denali Commission staff reach out and develop relationships with people in small communities who may not feel comfortable asking for help. This can head off problems before they develop, build trust, and improve project outcomes.

#### Federal Agencies Could Make More Use of the Denali Commission

One interviewee said some federal agencies operating in Alaska are currently contending with a glut of funds and limited capacity. Agency staff are trying to push out money intended for Tribes and rural communities, but Tribes lack capacity to "jump through all the planning and development requirements" quickly.

This is especially difficult when communities are working with multiple agencies, each with its own requirements. "It's not fair to think [Tribes are] going to drop everything to do yet one more project for a different federal agency or a different grant opportunity."

The pressure from federal agencies, the interviewee suggested, comes from the maximum five-year lapse date on their funding authority. This individual said the Denali Commission is an ideal partner to help federal agencies slow down and better tailor programs to rural Alaska needs:

"If a big chunk is given to Denali Commission, it turns into no-year money. Then you can take more time and develop something that's really going to work for the villages. We just need a lot more time up here because these [federal] programs do not have Alaska in mind."

# Conclusion

### **Two-Pronged Partnership**

As the sole Alaska-centric federal agency, the Denali Commission is uniquely situated to help close the gap between intent and reality when it comes to effectively addressing the needs of rural Alaska. A new influx of federal funds offers generational opportunities that a reinvigorated Denali Commission can help realize.

There is much to be gained. As new challenges and opportunities emerge in rural Alaska, the possibilities for an agency like the Denali Commission are great. One interviewee observed as an example: "Salmon populations are crashing. ... the Denali Commission could be very helpful in getting funding and resources to communities. There are new issues that need new approaches and lenses."

Optimizing the opportunities will depend on strong partnerships in two directions:

- (1) between the commission and the communities it serves
- (2) between the commission and other federal agencies.

The Denali Commission in its FY 2022 Agency Financial Report describes itself as a "federal-state-tribal-local partnership." This recognition of Tribes and local communities as partners represents an important shift from when the commission was established. The ideas in this report, shared by Alaskans dedicated to improving their communities, are meant to help realize a vision of true partnership.

While effective partnership between the commission and those it serves is critical, the Denali Commission needs adequate funding to be effective. Its unique role and unique flexibilities make the commission an ideal partner for other federal agencies looking to make a positive impact in rural Alaska. As described in this paper, the commission can help other federal agencies better pace their funding, allowing funders to slow down and more effectively prioritize, vet, and support projects in rural Alaska.

<sup>&</sup>lt;sup>14</sup> Denali Commission Agency Financial Report (AFR) FY 2022. https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2023/03/AFR-FY22-FINAL.pdf

# References and Further Reading

Below is an annotated list of select references and documents relevant to this discussion paper. Additional information and reports are available on the Denali Commission's website. Unpublished documents referenced may be obtained by request.

Alaska Governance Project, a North Star Group Initiative. <a href="https://ruralgov.org/">https://ruralgov.org/</a>

Alaska Native Tribal Health Consortium. *The Unmet Needs of Environmentally Threatened Alaska Native Villages: Assessment and Recommendations*. Unpublished draft. April 21, 2023. Note:

This report began in response to a time-sensitive request from the U.S. House Committee on Appropriations. The report was not co-developed with communities from its inception. 150 people from 27 communities and 39 agencies and organizations provided extensive review of subsequent versions of the report.

City Attorney's Office, City of Bethel. Letter to Julie Sande (Commissioner, Alaska Dept. of Commerce, Community and Economic Development) and Jason Brune (Commissioner, Alaska Dept. of Environmental Conservation). Letter describes perceived barriers to access to the state's Rural Utility Business Advisor Program (RUBA) and associated Village Safe Water grant funding. Barriers described parallel many of the barriers interviewees for this project identified. Excerpt:

[T]he SOA has imposed several requirements for funding eligibility, including an approved "Sustainability Plan" and a Minimum Operations & Maintenance (O&M) "Best Practices" score. These metrics were developed to assess systems' current technical capacity and predict long-term sustainability. While this is a worthy goal, neither metric accurately assesses current technical capacity of systems nor predicts sustainability. Rather, "Best Practices" and the "Sustainability Plan" are serving as gate-keeping mechanisms that undermine the fundamental purpose of these programs, which is to bring water and sewer infrastructure to Rural Alaska.

Congressional Research Service. Federal Regional Commissions and Authorities: Structural Features and Function. R45997. May 18, 2022.

Congressional Research Service. Federal Regional Commissions and Authorities: Administrative Expenses. July 15, 2022.

Denali Commission Act of 1998 (as amended 2022).

https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2022/03/Denali-Commission-Act-updated-March-2022.pdf

Denali Commission Agency Financial Report (AFR) FY 2022. https://02e11d.a2cdn1.secureserver.net/wp-content/uploads/2023/03/AFR-FY22-FINAL.pdf

Denali Commission Congressional Budget Justification Fiscal Year 2024, Anchorage, AK. March 2023. <a href="https://www.denali.gov/cj">https://www.denali.gov/cj</a> (FY 2023 and FY 2022 budget justifications also available here.)

Denali Commission. Project Database System. Database of projects that received Denali Commission funding, searchable by project number, recipient organization, project title, and current milestone. (The database is not an official accounting or obligation and expenditure record.) <a href="https://cf.denali.gov/index.cfm?fuseAction=AwardSearch.CheckSearchCriteria">https://cf.denali.gov/index.cfm?fuseAction=AwardSearch.CheckSearchCriteria</a>

Letter to Navigating the New Arctic Program, National Science Foundation from Melanie Bahnke (Kawerak, Inc.), Vivian Korthuis (Association of Village Council Presidents), Amos Philemonoff (Aleut Community of St. Paul), and Mellisa Johnson (Bering Sea Elders Group). March 19, 2020. Letter outlines concerns about research in the region ignoring the knowledge and rights of local communities, and providing suggestions for change. A follow-up letter in December 2021 alleges that no meaningful changes were implemented. Excerpt from initial letter:

Unfortunately, there continues to be a disconnect between resource managers, policy-makers, academics, agencies, and our communities. There are many types of research questions important to our food security, human health and well-being, infrastructure, security, cultural heritage, and resilience in an Arctic that requires increasingly nimble adaptation of our communities. We continue to lack meaningful access and voice in the vast landscape that is the 'research process' to ensure that these questions are addressed in locally relevant and respectful ways.

McDowell Group. *Denali Commission Program and Policy Review*. Prepared for Denali Commission and Bureau of Public Debt. August 28, 2007. Note: McDowell Group is now McKinley Research Group.

Thoughts on Reauthorization of the Denali Commission by Founding Federal Co-Chair Jeff Staser, Discussion Notes for AFN's HR Committee. June 21, 2011. Excerpt:

The Commission's core, its specific purposes, is comprehensive planning and execution. It offers more sustainable, efficient deployment of federal funds through collaboration among its partner agencies. That is its primary value to the federal government.

U.S. Government Accountability Office. *Alaska Native Issues: Federal Agencies Could Enhance Support for Native Villages to Address Environmental Threats*. GAO-22-104241. May 2022. https://www.gao.gov/products/gao-22-104241.

U.S. Government Accountability Office. *Inspectors General: Improvements Needed in the Office of Inspector General's Oversight of the Denali Commission*. GAO-14-320. September 2014. https://www.gao.gov/assets/gao-14-320.pdf

# **Appendix: Interview List**

We spoke with 30 people as part of this project and thank each for their time and trust. Their participation does not signify that they or any agency listed endorse the contents of this paper. We also note that most interviewees have past or present affiliations beyond those listed.

- Aaron Poe, Alaska Conservation Foundation
- Andie Wall, Kodiak Area Native Association
- Colleen Dushkin, Association of Alaska Housing Authorities
- Dalee Sambo Dorough, Inuit Circumpolar Council
- Danielle Stickman, Wilderness Society
- Dave Messier, Tanana Chiefs Conference
- Erin Dougherty, Native American Rights Fund
- Fran Ulmer, past roles include Lt. Governor of Alaska and Denali Commission State Cochair, UAA Chancellor, US Arctic Research Commission chair
- Freddie Olin, past staff to Denali Commission State Co-chair
- Karlin Nageak Itchoak, Wilderness Society
- Max Neale, Alaska Native Tribal Health Consortium
- Michael Shephard, State, Private, and Tribal Forestry, USDA Forest Service
- Nicole Borromeo, Alaska Federation of Natives
- Nikoosh Carlo, PhD, CNC North Consulting
- Robin Bronen, Alaska Institute for Justice
- Shareen Crosby, Alaska Office of the Governor
- Teresa Jacobsson, Alaska Tribal Administrators Association, JW Industries Group, Alaska Women's Leadership Forum
- Tyler Kornelis, Kodiak Area Native Association
- Vivian Korthuis, Association of Village Council Presidents

#### Individuals from seven small rural Tribes across Alaska:

- 3 tribal administrators and 1 other tribal employee
- 3 tribal council members or officers

#### Denali Commission:

- Garrett Boyle, federal co-chair
- Joelle Hall, commissioner (President, Alaska AFL-CIO)
- Julie Kitka, commissioner (President, Alaska Federation of Natives)
- Nils Andreassen, commissioner (Executive Director, Alaska Municipal League)

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