

**Comment Outline for NIGC Consultation
Little Creek Resort, Shelton, Washington
January 14, 2011**

Background:

- ❖ Jack Giffen, Jr., Council Member, representing the Confederated Tribes of Grand Ronde. Council Member Toby McClary and members of our Tribal Gaming Commission are here with me and will provide additional comments. Grand Ronde also plans to submit written comments later in the consultation process. Today, I want to speak to 2 issues that I believe are significant for NIGC to consider.

Self Regulation of Class II Gaming:

- ❖ Grand Ronde is proud to be one of the two tribes that have earned a Certificate of Self Regulation.
- ❖ The process for obtaining a Certificate of Self Regulation involves hard work and commitment to regulation, but we do not believe the process itself is unduly burdensome. In fact, high standards should be required in order to achieve self regulation.
- ❖ We take great pride in the Tribe's proven ability to regulate its gaming operation at a level far above minimum requirements.
- ❖ The Tribe is interested in ways to give full effect to IGRA's self-regulation provisions and the overall intent of IGRA to promote tribal economic development, tribal self-sufficiency and strong tribal governments.
- ❖ There should be clear benefits associated with a Certificate of Self Regulation. Some benefits would include exempting self-regulated tribes from independent MICS audits, providing exemptions related to facility license regulations, and consulting directly with self-regulated tribes on proposed regulations and guidelines.

Class III Minimum Internal Control Standards:

- ❖ The Tribe does not believe NIGC should impose mandatory Class III MICS on Tribes, but a set of recommended guidelines would be more appropriate.
- ❖ Tribes could adopt the recommended guidelines as their own Tribal Class III MICS if that is what the tribe deems appropriate.
- ❖ If mandatory Class III MICS are required, then there should be a Class III self-regulation certificate similar to the Class II self-regulation certificate and there clear benefits for obtaining self-regulation reflecting the tribe's exemplary regulating standard and ability.

Closing

- ❖ The standards for obtaining a Certificate of Self Regulation should not be weakened, the incentives for more tribes to pursue self regulation need to be more substantive and reflective of the tribes' ability to regulate at a high level.
- ❖ There are other issues Grand Ronde plans to comment on. Some of my colleagues on Council and members of our Tribal Gaming Commission are very much involved with NIGC regulatory issues and will provide comments.