IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE PEPION COBELL, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:96CV01285
	)	(Judge Lamberth)
GALE NORTON, Secretary of the Interior, et al.,	)	
	)	
Defendants.	)	
	)	

NOTICE OF FILING OF ELECTRONIC DATA SYSTEMS CORPORATION REPORT ENTITLED "TRUST REFORM, FINAL REPORT AND ROADMAP," DATED JANUARY 24, 2002

Interior Defendants hereby give notice of the filing of the January 24, 2002 report of their consultant, Electronic Data Systems Corporation entitled "Trust Reform, Final Report and Roadmap." A copy of the report is attached as Exhibit A.

Dated: January 25, 2002

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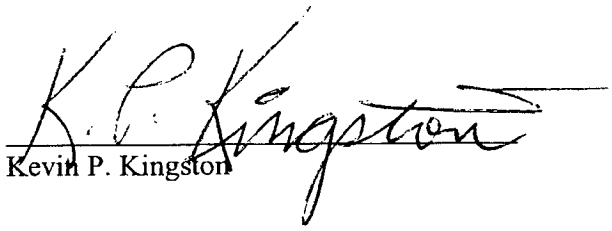

Kevin P. Kingston

DOI Trust Reform

Trust Reform, Final Report and Roadmap

Confidential

January 24, 2002

EDS

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I. Trust Reform Assessment Summary

1. Introduction

On July 10, 2001, the Secretary of the Interior issued Executive Orders 3231 and 3232. In the accompanying memo, Secretary Norton directed the Special Trustee to provide a plan for hiring a management consulting firm to provide a comprehensive independent assessment of the efficacy of the Department's Trust Reform efforts to date. Her expectation as a result of this assessment is to be assured that all of the subprojects are moving forward in a coordinated fashion and that each is managed in a way that assures the overall success of Trust Reform. Where such assurances cannot be made, Secretary Norton required specific recommendations that the Department could use to make necessary changes.

On August 31, 2001, the United States Department of the Interior (DOI), Office of the Special Trustee for American Indians (OST) contracted with EDS to provide this comprehensive independent assessment of the efficacy of the DOI's Trust Reform efforts to date. The Department requested the resulting report to include assessments of each of the eleven High Level Implementation Plan (HLIP) subprojects, the four court-identified breaches, the Cadastral Survey, and overall Trust Reform efforts. Assessments on two of the HLIP Projects, Trust Asset and Accounting Management System (TAAMS) and BIA Data Cleanup, were previously contracted with EDS in June 2001. The *Interim Report and Roadmap for TAAMS and BIA Data Cleanup* was published November 12, 2001. A clarifying statement related to the TAAMS Title recommendation is made in the HLIP 6 section of this report. Otherwise, by reference, that interim report is incorporated in this final report in its entirety.

Observations and recommendations related to Information Assurance (IA) were reported separately because specific security vulnerabilities were disclosed. The *Interim Information Assurance Report and Roadmap for TAAMS and BIA Data Cleanup* was published as a separate addendum on November 12, 2001. IA assessments of TFAS and MMS interfaces and systems were submitted to the Office of the Special Trustee for American Indians in separate memos on November 27, 2001 and December 21, 2001 respectively. By reference, those documents are also considered to be part of this final reporting.

In performing the contracted assessments, EDS has developed an understanding of the uniqueness of Indian Trust. In many ways it is similar to commercial bank Trust divisions; however, there are some differences and restrictions that add complexities. These complexities need to be considered in performing the fiduciary responsibilities mandated of a Trust. Some examples of differences and restrictions that apply to Indian Trust but not to commercial Trust are listed below:

- The Trust is unique in the amount of land under management, probate, title change requirements, and the sovereignty of the beneficiary community.
- The US Government formed the Trust by mandate instead of the Trust being formed by a Trustor.
- The cultural heritage associated with the land held in Trust is sometimes more important than its monetary worth.
- Trust agreements or Trust documents do not exist for each tribal account or each Individual Indian Monies (IIM) Account, which in a commercial Trust would provide specific guidance in management of the Trust assets.

- A large number of small accounts, below the threshold normally managed in the commercial Trust environment, exist within the Indian Trust. In some cases, the value of a Trust account is less than the cost of its administration.
- The Indian Trust does not charge for services and there is no mandate to generate a profit.
- By law, the Trust is limited to investments in Government or Government-backed Securities.

This report is the final deliverable of the Trust Reform Assessments. All comments received by January 11, 2002 from the DOI based on the previously published Observations and Recommendations Report have been considered in revisions contained in this report and the corresponding roadmap.

To develop the content of this report, the EDS team has conducted approximately 200 interviews, including central, regional and agency staff, tribal leaders, representatives of Native American beneficiaries, vendors and contractors. These interviews took place in Washington, D.C.; Albuquerque, NM; Bureau of Indian Affairs (BIA) regional offices; BIA field offices; and Office of Trust Funds Management (OTFM) field offices.

2. Summary Findings

The findings presented here provide an executive-level summary of the EDS assessment of Trust Reform. A comprehensive discussion is provided in the Trust Enterprise Analysis and Recommendations section IV of this document. That section focuses on topics which are enterprise-wide, and not just within the scope of existing Trust Reform subprojects described in Subprojects and Breach Assessments section VI. All observations and findings within this report are based on information derived from interviews and review of existing source documentation. An inventory of source documents used to prepare this report is included in the appendices. The Summary Findings are:

- **Trust Reform has Lacked a Vision or Strategy.** Trust Reform definition has centered on tactical, administrative elements and correcting individual problems. The Department of the Interior (DOI) interviewees acknowledged that Trust Reform efforts have focused on the HLIP subprojects and Court Breach projects. The approach to Trust Reform has lacked an enterprise-wide strategic view. The previous DOI Secretary did not support the *Strategic Plan (1997)* and as a result, the HLIP was developed in 1998 and amended in 2000 as a tactical interim solution. However, it was never intended to be an all-encompassing Trust Reform strategy. As a result, Trust managers often do not agree on priorities for the overall direction of reform efforts.

- **There is Not an Overarching Fiduciary Duty Focus to Trust Management Activities and Operations as Directed by the American Indian Trust Fund Management Reform Act of 1994 (Trust Reform Act of 1994).** The fiduciary responsibilities outlined in the Trust Reform Act have not been distilled into a comprehensive strategy. These responsibilities include:

  - Accounting for Indian Trust Fund assets.
  - Preparing accurate and timely reports to account holders, which identify source, type, and status of funds, beginning balance, gains and losses, receipts and disbursements, and ending balance.

- Assuring accuracy of accounts and cash balances
- Managing the natural resources located within the reservations and trust lands.

Industry standards and common law provide a framework for the responsibilities of a fiduciary to include:

- Exercising care and skill in making, monitoring and reviewing investments (financial and non-financial) in accordance with an appropriate Trust investment strategy;
- Preserving assets of the Trust;
- Carrying out duties in a manner that is reasonable in terms of both approach and cost;
- Acting solely in the interests of the beneficiaries with undivided loyalty and impartiality;
- Taking reasonable steps to supplement personal skill and experience with advice, guidance, and assistance.

Regarding these fiduciary requirements, the Department lacks comprehensive and proactive management of the Trust corpus for its highest and best use. In general, EDS observed individual field office personnel attempting to achieve beneficial results, but the DOI does not have a defined set of standards and does not systematically assess whether fair returns are being attained. Further, many DOI staff have both Trust and non-Trust responsibilities. The industry standard is to separate Trust responsibilities from other activities.

- **The Trust Reform Subprojects are Not Well Coordinated or Integrated Resulting in "Independent Silo" Efforts.** EDS's assessments revealed a fragmented approach to addressing Trust Reform. There is no overarching approach or goal to provide the cohesion needed in a complex environment. There is no common project schedule to provide focus to all Trust Reform efforts. Subprojects have their own schedules and efforts that are not coordinated. Reform priorities are often driven by court demands rather than Trust Reform objectives.

- **Beneficiaries are Not Receiving the Level and Type of Service Normally Found in Commercial Bank Trust.** Beneficiary reporting and access to account status information is inadequate. There are no consistent service standards or well defined remedial action processes. The consultation services and communications concerning Trust asset investment approaches and plans are inadequate. There are problems with the identification of beneficiaries and their linkage to specific Trust assets.

- **Inefficiencies Exist in the Management of the Trust.** A number of processes can be streamlined and technologies introduced to reduce cost and improve service. Examples include the inefficiencies from the fractionation and the transfer of Trust realty ownership interest to heirs of American Indians. This transfer of the decedent's ownership interest to multiple heirs results in an increase in the number of American Indians possessing an undivided ownership interest in the entire parcel of Trust realty. Fractionation creates an administrative and cost burden on the Trust. This issue has continued for a considerable time and remains unresolved.

  Similarly, other inefficiencies have created various backlog problems. Periodic efforts have been attempted to relieve the backlog issues, but they continue to recur.

- **Lack of Adequate Resources to Conduct Trust Activities.** For many of the activities defined in the HLIP and the court breaches, insufficient human, financial, and technological resources have been applied to complete the activities.

3. Summary Recommendations

The following high-level recommendations represent the most critical activities for ensuring the success of Trust Reform. Some were distilled from the subproject assessments and summarized here for reasons of priority and impact. Others are based on the Overall Trust Reform Assessment and do not appear in any of the subproject reports.

- **Develop a Fiduciary Duty Focus and Strategy to Trust Management Activities and Operations.** The trustee has a duty to the beneficiaries to invest and manage the funds of the Trust as a prudent investor. This requires the exercise of reasonable care, skill and caution, and is to be applied to investments in the context of the Trust portfolio and as a part of an overall investment strategy. In addition, the trustee must adhere to the fundamental fiduciary duties of loyalty and impartiality – the DOI must separate the functions and responsibilities of Trust and non-Trust activities. Without this separation there is confusion concerning what defines "Trust" and the execution of fiduciary responsibilities versus other activities such as estate planning and social services.

- **Create a Beneficiary Approach to Trust Activities and Service Delivery.** This approach must incorporate beneficiary involvement in the direction of the Trust, as well as provide transparency and information to beneficiaries. Key Trust Reform responsibilities such as conservation of land and assuring a fair return on assets should be established and monitored. The beneficiary-centric Trust activities should include such aspects as personalized electronic interactions, outreach communications, multiple delivery channels, and consideration of additional Trust Fund investment alternatives and services. Alternative funding sources might be considered for other premium services.

- **Develop an Enterprise Architecture to Facilitate Fiduciary Responsibilities and the Beneficiary Approach.** As recommended in the *Interim Report and Roadmap for TAAMS and BIA Data Cleanup*, an accurate, current state business model should be developed and associated technology-oriented components mapped to create a baseline. A new Trust Enterprise Architecture consisting of agreed-upon and coordinated business processes, internal controls, information, application and infrastructure components should be developed.

- **Create an Organizational Model with Adequate Resources to Support the Trust Business Model.** Realign the organizational structure to the new Business Model by consolidating all Trust functions and services into a single organization within the DOI. Appoint a single Executive Sponsor to be responsible for all Trust Reform, Trust functions and services. Critical staffing requirements should be identified, quantified and filled. After the completion of a new Business Model, staffing requirements should be reassessed. In addition, adequate funding for Trust and Trust-related activities should be evaluated and provided. For specific recommendations please refer to the Subproject and Breach assessment sections.

- **Improve Efficiency of Trust Management Processes and Apply Appropriate Industry Standards.** Workflows among organizations and systems need to be defined. Performance metrics must be developed, monitored and compared to industry standards.

- **Establish Clear Metrics to Manage Trust Business and Assess Performance.** The Trust must obtain agreement on what should be measured and what objectives or improvements are expected. These metrics must be established in conjunction with the redesign of Trust business processes.

4. Status of Trust Reform Projects

The following status snapshot is based on the Change Assessment interviews, business and technical reviews, project management health check, information assurance reviews, and document reviews. The EDS Team reviewed eleven HLIP subprojects, four court identified breaches and Cadastral Survey.

The TFAS and MMS Subprojects have been completed. The OST's IIM Administrative Data Cleanup and BIA Appraisals Subprojects have made substantial progress towards completion. The Training Subproject and the Workforce Planning Breach are lagging in their progress. The remaining subprojects and breaches have made varying degrees of progress. Frequently the HLIP too narrowly defines the scope of the subproject and fails to establish a basis for solid gains even when the subproject has been completed.

ASSESSMENT OF CURRENT SUBPROJECT AND BREACH STATUS
HLIP 1: OST's IIM Administrative Data Cleanup The cleanup of records for TFAS pre-conversion purposes was completed as of September 1999, with the exception of jacket files from three tribes who objected to removal of active files. However, in the course of the cleanup effort, an undetermined amount of additional work has been identified that will require continued effort.
HLIP 2: BIA Data Cleanup and Management Please refer to *TAAMS /BIA Data Cleanup Interim Report and Roadmap* published November 12, 2001.
HLIP 3: Probate Backlog A substantial number of HLIP events in the area of probate process reform have been completed. However, due to inadequate staffing and funding, significant probate backlogs continue to exist in probate case processing, summary distribution, Office of Hearings and Appeals (OHA) adjudication, Land Title Records Office (LTRO) posting/recordation, and *Youpee* redistribution.

ASSESSMENT OF CURRENT SUBPROJECT AND BREACH STATUS

HLIP 4: BIA Appraisals

Nine of the twelve Appraisal Program HLIP tasks are reported to be complete. A significant amount of effort has been expended to evaluate viable options and solutions for addressing the three remaining key HLIP tasks - an Appraisal Tracking database, a Comparable Sales database system, and Appraisal organization realignment plan. However, no final implementation action has been initiated.

HLIP 5: Trust Fund Accounting System - (TFAS)

TFAS was implemented and has been operational for over one year. However, the documentation of the business procedures and improvement of the integration of other applications with TFAS remains to be accomplished.

HLIP 6: Trust Asset & Accounting Management System – (TAAMS)

Please refer to *TAAMS /BIA Data Cleanup Interim Report and Roadmap* published November 12, 2001.

HLIP 7: MMS Systems Reengineering

The MMS effort resulted in a process reengineering of the royalty collection area and development of a new application. A recent live production run of the application was successful. However, establishing change control procedures for MMS and integrating it into the overall Trust business process remains outstanding.

HLIP 8 and Breach 2: Records Management/Retention

The Office of Trust Records has made substantial progress in the retention, cleaning and storing of Federal Records. However, the full-unified records management solution objective has not been met. A considerable amount of work remains. Both the Records Management Subproject and the Records Retention Breach are consolidated under Records Management.

HLIP 9: Policies and Procedures

This subproject has made progress in developing BIA policies & procedures against two of the four required HLIP objectives, but has not coordinated with the other nine organizations identified in the HLIP. The subproject requires coordination with key officials from the Office of the Special Trustee, Office of Hearings and Appeals, Minerals Management Service, Office of Surface Mining, Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, National Park Service and the U. S. Geological Survey.

HLIP 10: Training

This subproject's effort has been scaled back to only one non-system training course – *Trust Foundations, an Introduction to Trust Reform and Change.* Although not coordinated by the subproject, TFAS training has been completed and TAAMS training is in progress.

ASSESSMENT OF CURRENT SUBPROJECT AND BREACH STATUS

HLIP 11: Internal Controls

This subproject has made little progress toward its first objective to resolve identified internal control deficiencies. The second objective, developing and implementing a risk management program, is in the early stages of implementation with four to five years of effort ahead.

Cadastral Surveys

There are no specific HLIP tasks associated with Cadastral Surveys. However, the single greatest issue related to the fiduciary performance of Cadastral Surveys is the inadequate level of BIA funding necessary for BLM to perform and complete the backlog of needed surveys.

Breach 1: Collection of Missing Information from Outside Sources

The court-required plan for the collection of missing information has been written. A pilot targeting a sample of jacket files to locate missing information was completed. However, none of the information recovered was validated. Currently, all collection activities have been transitioned to the Office of Historical Trust Accounting.

Breach 2: Retention of IIM-Related Trust Documents

Please refer to the status of HLIP 8.

Breach 3: Computer and Business Systems Architecture Framework Plan

A high-level Trust Architecture has been completed as an important and initial step. Key Trust business and technology leaders did not participate in its development and have not validated or accepted it for their use. Further development is required to define the details of the current Trust business and provide a management tool. No plans exist to educate and communicate the purpose, content and value of an Architecture.

Breach 4: Workforce Planning

Workforce planning involves hiring, recruiting, staffing, retention, and individual development planning efforts. However, in recent months the subproject's focus has shifted to filling vacancies rather than overall workforce planning. No comprehensive workforce planning effort is being implemented at this time.

II. Trust Reform Guiding Principles

By Executive Order 3215 signed April 28, 2000, the previous Secretary published Trust Principles as guidance to DOI employees responsible for Indian Trust Assets. However, most of the DOI employees interviewed during this assessment were not familiar with those Principles. Instead, Trust Reform is commonly framed by the responsibilities described in the Trust Reform Act of 1994, the resulting HLIP subprojects, and the court identified breaches. To identify a comprehensive set of guiding principles for the Department to follow, EDS balanced the Trust Reform Act and the Secretary's Trust Principles with the dynamics affecting organizational performance. These Guiding Principles listed below will help the Department to define a clear vision and strategic objectives to aid in transitioning the Trust organization from its current state to its future state.

1. Fulfill Fiduciary and Legal Responsibilities

The primary focus of Trust Reform is to fulfill the fiduciary and legal responsibilities defined by law. These fiduciary responsibilities, as outlined in the Trust Reform Act, include:

- Accounting for Indian Trust Fund assets.
- Preparing accurate and timely reports to account holders, which identify source, type, and status of funds, beginning balance, gains and losses, receipts and disbursements, and ending balance.
- Assuring accuracy of accounts and cash balances
- Managing the natural resources located within the reservations and trust lands.

In addition to the responsibilities outlined in the Trust Reform Act, the DOI must also fulfill the fiduciary imperatives outlined by the general standards of prudent investment:

- The trustee is under a duty to the beneficiaries to invest and manage the funds of the Trust as a prudent investor.
- The trustee must exercise reasonable care, skill and caution, and apply it to investments (financial and non-financial) in the context of the Trust portfolio and as a part of an overall investment strategy.
- The trustee must adhere to the fundamental fiduciary duties of loyalty and impartiality.

2. Ensure the integrity of Trust business processes and data

A principle goal of Trust Reform is to ensure the integrity of Trust business processes and data. All stakeholders must have confidence that the Department is capable of meeting its responsibility to establish and maintain a complete, accurate accounting of Trust assets, the ownership and financial interest in those assets, the use of Trust lands and the income and distributions resulting from that use. This requires consistent and reliable business processes based on complete, accurate data.

3. Create an Accountable Organization

To achieve reform objectives, the Department must establish accountability throughout the entire organization, by aligning responsibility and authority at all levels.

The workflows and communication among groups must be less complicated. The Trust functions and services should be managed by objectives with specific performance metrics to measure the effort, resources and time required to achieve reform-related objectives. The DOI must also be able to consistently predict and communicate the impact that performance will have on related activities.

The stakeholders must be involved in establishing the objectives and corresponding metrics. Employees must be well trained in Trust concepts. Adequate staffing to perform Trust responsibilities must be in place.

4. Increase Beneficiary Involvement

The key to ensuring the support of Beneficiaries is to invite and encourage their participation in Trust Reform activities and decisions that directly impact them. In establishing the new Trust organization and corresponding roles, responsibilities, and processes, a key overarching approach to Trust Reform and its ongoing operations must be the early involvement of Beneficiaries. The new Trust organization must hold regular, government-to-government consultations with the Indian Nations to discuss major Trust Reform initiatives prior to their implementation. These consultations should be professionally facilitated, and prior to the session, all parties must agree to come to a consensus within an established period of time. In addition, Trust Reform leaders must be open to discussing other ways to increase communication and collaboration between the two governments on decisions impacting Beneficiaries. The critical objective of the two governments is improving customer service and increasing Beneficiary satisfaction. This mindset of consultative decision-making must be embraced by all parties and embedded in all new Trust initiatives.

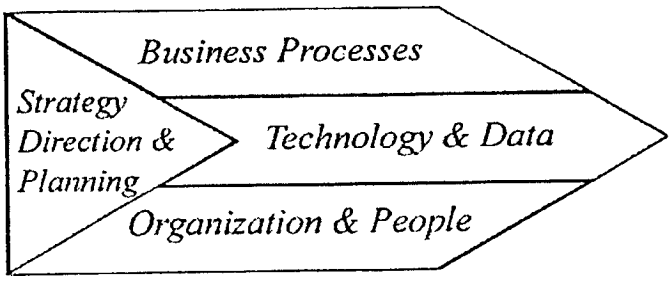
5. Provide Reliable Consistent Business Services

In order to successfully deliver reform, the DOI must define and adopt business services that are consistent, to the greatest extent appropriate, while continuing to consider the Tribal needs and the ramifications of local statutes. The standardization of common processes is required across all regions.

The business processes must have a beneficiary-centric focus. The DOI Trust culture needs to be one of service with an emphasis on personalized interactions, using commercial Trust standards as the model for service.

III. Change Implementation Components

When implementing large-scale change in an organization, there are four components to the enterprise that will be impacted. As depicted in the diagram below, the four primary components are: Strategy Direction & Planning, Business Processes, Technology & Data, and Organization & People. Strategies for managing change within each component need to be established and integrated. Action plans for each component need to be aligned with the overall business strategy and direction.



The findings, observations, and recommendations in this report fall into each of the four components and aspire to the following practices:

Strategy, Direction & Planning – the objectives and strategies are clearly defined, agreed and communicated to all stakeholders. A system of governance is established to monitor and control progress toward those objectives.

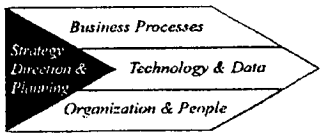
Business Processes – core business operations and processes are realigned with enterprise objectives. Steps can then be taken to ensure that business operations support key offerings prior to, during, and after relevant changes are implemented.

Technology & Data – the ownership and stewardship of all critical data are aligned with organizational roles and responsibilities. Information Technology services can then be aligned to ensure adequate support for organizations and processes.

Organization & People – organizational roles and responsibilities are aligned to establish and reinforce accountability for achieving enterprise objectives. Steps can then be taken to ensure all organizations are appropriately staffed, trained, and prepared to embrace required changes.

IV. Trust Enterprise Analysis and Recommendations

1. Develop a Fiduciary Duty Focus and Strategy to Trust Management



The fiduciary responsibilities outlined in the Trust Reform Act have not been distilled into a comprehensive strategy. These responsibilities include:

- Accounting for and managing Indian Trust Fund assets.
- Preparing accurate and timely reports to account holders which identify source, type, and status of funds, beginning balance, gains and losses, receipts and disbursements, and ending balance.
- Maintaining complete, accurate, and timely data regarding the ownership and lease of Indian lands.

Common law and appropriate industry standards provide a framework for the responsibilities of a fiduciary to include:

- Exercising care and skill in making, monitoring and reviewing investments (financial and realty) in accordance with an appropriate Trust investment strategy;
- Preserving assets of the Trust;
- Carrying out duties in a manner that is reasonable in terms of both approach and cost;
- Acting solely in the interests of the beneficiaries with undivided loyalty and impartiality;
- Taking reasonable steps to supplement personal skill and experience with advice, guidance, and assistance.

Observations and Findings

Generally speaking, fiduciary duties do not consistently drive the activities, processes, policies and training related to the Trust. For example, the Department does not develop strategic investment plans for all of the Trust assets. Individual field office personnel are attempting to achieve beneficial results, but the DOI does not have plans and defined standards for return on investments. The Department does not systematically assess whether fair returns are being attained. Further, many DOI staff have both Trust and non-Trust responsibilities. The industry standard is to separate Trust responsibilities from other activities.

Detailed Recommendations

1.1 Define and implement strategic objectives and priorities

Clear strategic objectives will help transition the organization from its current state to the desired future state. As noted above, the Trust Reform Act and fiduciary responsibilities established in law already provide several strategic level expectations, which have not been used to guide Trust

Management activities. These include a focus on natural resource management, return on investment of assets, and provision of quality services to the beneficiaries.

1. 2 Seek legislative change to provide Trust Fund investment alternatives to the Beneficiary community

EDS recommends offering an array of pooled investment vehicles in lieu of the current statutory limitations of government securities. Mutual funds is an example of a permissible investment for trustees under the principles of the Prudent Investor Rule. These investment vehicles facilitate diversification, and would offer an option to the Beneficiaries to match risk/reward preferences within prescribed limits. A prudent investor acting in a fiduciary capacity should provide investment vehicles, such as mutual funds containing common stocks or bonds, with the prospect of achieving a greater return.

1. 3 Develop a proactive approach to land management and review

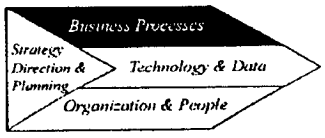
The majority of the Trust Reform subprojects have focused on recording accurate Title information, properly accounting for Trust assets, and preparing accurate and timely reporting of account activity.

The accounting responsibility described in the Trust Reform Act is a good start on sharing accurate information, but focuses primarily on current balances and past activity. EDS recommends disclosure of the actual assets in which the Beneficiaries have an interest, and a traceable, two-way flow of information documenting their participation in the proactive determination of the land objectives and use decisions.

EDS also recommends improving the Trust's real property management by:

- Incorporating proactive solicitation of Beneficiary involvement in setting goals and objectives for land use;
- Documenting cultural interests and rights related to the land;
- Developing evaluations including estimated fair market values of similar property usage, alternate usage and culture impacts;
- Developing more participative decision processes;
- Providing information on the land relevant to the Beneficiaries in an open environment

2. Create a Beneficiary Approach to Trust Activities and Service Delivery



DOI should transform Trust processes and activities to focus on the requirements of the beneficiary. This beneficiary focus must be pervasive throughout the organization and drive the day-to-day activities and decision-making. Key components of this beneficiary-centric approach should include:

- Open direct lines of communications with beneficiaries to ensure appropriate participation in Trust activities.
- Provide mechanisms that allow for ongoing dialogue with beneficiaries which increase the transparency of the Trust operations.
- Develop personalized services that are tailored to the needs of beneficiaries including multiple delivery channels and ongoing outreach activities.
- Ensure the beneficiary-centric direction is infused throughout the organization through an ongoing program of communication, education and training.

Leading industry practices to improve customer satisfaction include consistent dialogue, personalization of services, and improving services through repetitive, timely communication tailored to the customer's needs and interests. This standard should be applied to Trust Beneficiaries and other constituencies. The Trust can proactively interact with the Beneficiaries and gain knowledge to better align execution of Trust services with expectations.

Observations and Findings

A Trust Reform Strategy has not been defined and communicated. Leaders are not aligned in their Trust Reform priorities. Employees do not understand the Trust Reform objectives and their roles.

There is a lack of direct personalized contact with Beneficiaries to effectively communicate Trust activity and to gather and understand Beneficiary preferences. Beneficiaries feel that they have limited, if any, input into the direction, priority and timing of Trust Reform-related initiatives. Few consistent, formal methods or processes exist to capture Beneficiary inputs to either Trust Reform or regular Trust functions and services. There is a lack of knowledge and little sense of intimacy with Trust Beneficiaries and constituencies. As a result, stakeholders are less receptive and in many cases highly resistant to changes that impact their organizations and capabilities.

Detailed Recommendations

2.1 Support direct Beneficiary interaction through multiple delivery channels

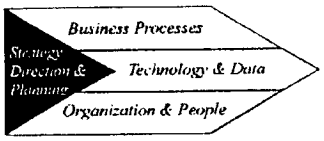
Beneficiaries should be offered multiple channels of interaction such as those commonly found in industry - call centers, websites, kiosks and account managers. Call centers and websites should provide self-service options for all basic Trust services. Kiosks and smart cards may be offered at selected sites, (e.g. Tribal offices) to facilitate services such as IIM Account distributions. Account managers should be assigned to every Trust constituent, with the responsibility for personalized consultation and relationship management.

2.2 Provide communication and interaction with Beneficiaries regarding Trust Reform

Frequent, timely, and honest interchanges of information tailored and directed to the Beneficiaries regarding Trust performance will improve relationships between the trustee and the beneficiary. Providing proactive and timely disclosure of business performance measures and Trust Reform progress will provide a forum of factual information. This will increase the credibility and faith in other Trust communications regarding plans and promises for future Trust Reform progress.

The cornerstones for all communication must be trust, honesty, openness and accuracy. If the information is not deemed accurate from the audience's perspective, then communication efforts will fall short, and attempts to increase organizational participation and collaboration across the organization will be severely hampered.

3. Develop a Fiduciary and Beneficiary Focused Business Model



An enterprise architecture consists of business process, information, application and technology infrastructure components. It is used as a management tool to target areas that must improve and to design and scope coordinated business process and technology oriented improvement initiatives. An important element of the architecture is the business model which documents the business functions and information. As recommended in the *Interim Report and Roadmap for TAAMS and BIA Data Cleanup*, an accurate, current state business model should first be built and associated technology oriented components mapped as a baseline. The participation of all key business and technical personnel of the enterprise is required. Using the Trust Management strategy as a vision, in conjunction with a fiduciary and beneficiary focus, and the current state model to identify improvement opportunities, a future state of the Trust Management Enterprise Architecture should be crafted and improvement targets identified and prioritized. These improvement initiatives should be scoped as to the impacted processes, applicable internal controls, applications and data.

This effort should be understood and embraced as a valuable management tool, and it must be socialized throughout the entire Trust community.

Observations and Findings

Trust processes are not defined consistently within the DOI Trust community. An incomplete, draft list of business activities related to Trust operations exists. Key Trust business and technology leaders did not participate in the development of the draft list. Our interviews indicate that Trust processes vary widely by region, field office and agency. As a result, it is likely that the draft does not accurately represent the current Trust business. Additionally, because key Trust leaders did not participate, they cannot be expected to readily accept the draft as they were not involved in the decisions leading to its creation. The draft list, therefore, should be considered only as a starting point.

Currently, no plans exist to educate and communicate the purpose, content and value of an Architecture.

Policies, guidelines, and responsibilities to manage relationships are missing. Information isn't shared consistently or accessible in a timely manner by parties with legitimate interest and need.

Trust-employed interviewees frequently expressed dismay, or discounted concerns expressed by Beneficiaries about the foregoing items, in a sincere belief that their delivery of services and courtesy extended toward Beneficiaries was consistently efficient, polite and accommodating. Yet, for Beneficiaries seeking access to Trust information or services, methods of interacting with the Trust are cumbersome, and require knowledgeable navigation of DOI organizations.

There is not a comprehensive Trust Reform Plan. There are pockets of people who understand the need for Trust Reform but those are mostly limited to executives. Only a few understand the big picture while most people in the field are not knowledgeable and in most cases highly resistant to change. Recognizing and dealing with this resistance to change will help to ensure success in organizational, technology and business process change.

Detailed Recommendations

3.1 Develop a comprehensive Enterprise Architecture

Beginning with the business process component, an accurate architecture must be built and used to design and build the future state of Trust. The Trust Enterprise Architecture, a representation of the Trust business, consists of processes, internal controls information, application and technology infrastructure components. It is used as a management tool to target areas of the business that must improve and to design and scope improvement initiatives. To be understood and embraced as a valuable management tool, the architecture must be socialized throughout the Trust Management community.

For Trust leadership to agree to commit and involve themselves in the identification of Trust processes and to support additional development of the Enterprise Architecture, they first must understand what an architecture is, how it is used, and the benefits it provides. A short but dedicated effort is required by them to achieve this understanding. Additionally, to ensure likewise commitment by other key Trust Management staff, leaders must openly demonstrate and communicate the importance they place in this undertaking.

Once high-level business processes are identified, work to continue to "build out" the current architecture must commence. Both business and technical representatives must participate to ensure its accuracy and effectiveness for use as a management tool.

Using the current proposed architecture as the current baseline representation of the Trust enterprise, business and technical leaders will target processes to be improved. Improvement initiatives are scoped as to the impacted processes, applications and data.

Because the architecture, especially its business process component, must become the "common language" for reference to the business across the entire Trust community, it must be easily accessible. Steps to accomplish this may include a structured roll out program supported by a web-enabled mechanism to provide access throughout the organization.

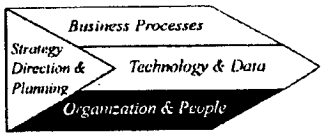
3.2 Develop Trust Reform Transition Plan

It is essential that DOI, specifically the Indian Trust, build an effective change management program and corresponding plan to properly manage the impact of the Trust reform changes to come. A key tool in realizing the magnitude of change and setting priorities is the current state and future state models within the Enterprise Architecture.

EDS recommends a detailed change management project plan be developed and executed. The plan must be built on sound project management principles with change management industry standards as the foundation. A change management plan incorporates eight areas of focus: team structure, leadership, education and training, resource management, business and technology, performance measurement, relationship management, and communications. Two way communication is absolutely necessary in an environment of organizational change. By taking these areas into consideration, Trust Reform has a much better chance at success.

Change is a process, and it can be managed. To be effective, change management must go beyond traditional organizational change dimensions. It is a seamless approach that integrates and aligns people, business processes, technology, and organizational structure to ensure successful Trust Reform.

4. Create an Organizational Model with Adequate Resources



Consolidate Trust related functions into a single Indian Trust organization accountable for executing, maintaining, and managing Trust activities. Organizational alignment is critical to running any business or organization. The new Indian Trust organization will need to have consolidated authority over all Trust functions and services. Once the organization is defined, current staffing requirements need to be reassessed and filled with adequate funding to support this staff and their Trust activities. The Indian Trust organization will be a new structure to ensure beneficiary-centric models and improved Trust Management. A recommended Office of Standards will provide support for the project management and direction of Trust activities. The Office of Indian Trust Transition should support consistent and targeted communications to employees and beneficiaries to create a more informed Trust environment.

Observations and Findings

In the current organizational structure there is a notable environment of contention, lack of mutual respect and cooperation and in some cases adversarial posturing between the various offices, bureaus and agencies. Progress is impeded due to problems with the current organizational structure, i.e., lines of authority are blurred or non-existent, managers are not given clear authority to manage, and objectives and roles are not clearly communicated.

Within the Department, there is not a comprehensive investment review and monitoring process. Additionally, although there are currently various government audit and oversight offices that perform reviews and audits, there is no designated "audit committee" to oversee the audit efforts and problem resolutions related to Trust. The DOI lacks the resources necessary to effectively manage the Trust. These resources include financial as well as human capital.

Roles, responsibilities, objectives, and clear criteria for success are not well defined. Skilled, capable resources try to do their best, but frequently feel conflict, believing they will be criticized for anything they do.

There are not enough senior management "champions of change" who are highly visible and communicate with conviction and passion the purpose and results of successful Trust Reform. Simultaneously, change has not been driven from the bottom up to create ownership of the change initiatives.

Detailed Recommendations

4.1 Appoint a single Executive Sponsor responsible for all Trust and Trust Reform functions and services

The Executive Sponsor will be responsible for successfully implementing Trust Reform initiatives. The Executive Sponsor will have the authority and responsibility to direct all Reform initiatives, setting scope and priorities. Successfully implementing the transformation and continued Trust responsibilities requires an accountable organization with the capability and the

capacity to execute required Trust activities. The Executive Sponsor will be the visible leader in the organization's change to a beneficiary-centric business model. The Executive Sponsor should have line authority over all Trust related activities and the employees executing those activities.

4.2 Establish a Trust Board

Create a Trust Board to enhance leadership capabilities, provide supportive counsel and ensure successful continuity during the transformation. An effective structure should include a Board similar to that of a Board of Directors in a national banking enterprise. The purpose of such a Board is to oversee the exercise of the Trustee's fiduciary powers. The Board should consider key beneficiaries views to approve Trust objectives and priorities and oversee the Trust performance. Composition of the Trust Board should include Trust Management, Beneficiaries, and appropriate industry experts who understand and are totally committed to effectively managing the Trust Reform change effort.

The Trust Board will work directly with the Audit Committee. The Audit Committee will initiate periodic audits, reconciliation, compliance and assessment processes. This committee, in coordination with the Office of Trust Risk Management, will also perform internal controls monitoring. To remain objective in its auditing duties, this committee will operate as an independent third party.

4.3 Establish Office of Standards

The Office of Standards would provide the direction needed surrounding the implementation of Trust activities. There should be two primary objectives for this office, one will be providing the guidance and support necessary to have successful implementation of Trust activities and the second is to monitor and report on progress made and resources expended toward overall Trust program objectives. EDS recommends the Office of Standards implements the Trust Management Performance Online Reporting Tool to monitor progress made by the Indian Trust in the area of Trust Management (see Recommendation 5 for more information). To most effectively meet these objectives, the Office of Standards should include the following skill areas:

- **Trust Program Management Center (TPMC):** The TPMC will define and enforce standardized methodologies for project management and systems development. Consistency can be realized in project management disciplines such as resource, schedule, scope and cost management by institutionalizing the TPMC. Authority to monitor and report on the various Trust activities will be given to the TPMC to enforce effective project management. The TPMC will also be responsible for providing training on project management tools and disciplines for all project and program mangers within the Indian Trust. The TPMC will provide mentorship and guidance in integrating all the individual project initiatives operating within the Indian Trust.

- **Architecture Center:** The Architecture Center is critical to the ongoing success of building and maintaining a unified Enterprise Architecture in a complex environment. The Architecture center will be the central location from which the Enterprise Architecture is managed. This Center will be responsible for communicating and sharing the architecture with all the employees of the Indian Trust. All Enterprise Architecture tools and plans will be coordinated from this center so the Enterprise Architecture can be used as a dynamic management tool. This will coordinate with Process Owners and other relevant staff to incorporate feedback and input to the architecture from internal and external sources, such as the CIO for DOI.

- **Center of Trust Policies and Procedures:** The Center of Trust Policies will work in close coordination with the TPMC to establish policies and procedures to assist employees in completing their jobs. The Center of Trust Policies will provide oversight for the program offices creating policies and procedures for their own activities. This Center and its staff will be responsible for understanding new laws passed and retirement of old laws. All overarching Trust Management regulations for the Indian Trust will come from this Center, as well as all communications regarding policies and procedures. This center will also ensure that policy and procedure development within the Indian Trust follows the 1990 Comptrollers Handbook. For more information on this topic please refer to the Policies and Procedures Subproject assessment in this document.

- **Performance Measures and Reporting Center:** This center is responsible for establishing, monitoring and reporting ongoing Trust functions and services performance metrics. This Center will provide quantifiable measures, achievable business performance objectives, priorities, and performance improvement.

4.4 Establish an Office of Indian Trust Transition

The Office of Indian Trust Transition will include a core group of change champions with leadership skills to effectively implement and mentor cultural change for Trust Reform. Effective leaders manage change in a holistic manner by integrating business processes, technology, organizational structure and people. A group of 12-15 key leaders will be needed to clarify and direct change initiatives, listen to employees' concerns and immediately communicate effective solutions. The Office of Indian Trust Transition will need to report directly to, and have the full support of, the Executive Sponsor. The Office of Indian Trust Transition will control all internal communication initiatives directly related to the Trust transition and the communication of enterprise wide announcements.

4.5 Develop a comprehensive Workforce Management capability to attract, develop, and retain qualified resources

Workforce planning is an approach to determine current and future staffing needs based on business strategy and direction, develop retention and recruitment policies to make swift decisions on how best to manage the workforce, and prepare for future needs through succession planning.

Additional resources have been recommended throughout this report. In determining resource allocations, a Workforce Planning process must be followed to ensure resource requirements are justified. These resource needs should then be prioritized according to the urgency of providing fiduciary responsibilities to beneficiaries.

EDS recommends that DOI develop organizational work plans focused on workforce planning, including, staffing, recruiting, and retirement forecasting. To accomplish this, DOI should establish a single organization to develop, coordinate, and lead Trust Management workforce planning and training efforts. To support this recommendation, the following should also occur:

- The workforce planning methodology that has been developed and documented in response to the HLIP subproject needs to be institutionalized throughout the Indian Trust. Managers and supervisors need to be educated/trained and then held accountable to the standards of the methodology. This will result in better forecasting of resource needs, better planning for filling those needs, and ultimately lower vacancy rates.

- Once the positions needed are known, a new approach to filling vacancies should be developed including options such as outsourcing and seasonal employment, as well as a stronger emphasis on local recruiting.

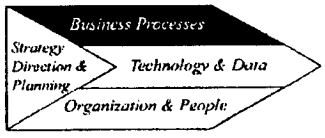
Currently, hiring and staffing is one of the areas receiving the most complaints across Trust organizations. To advance Trust Reform goals and objectives, the right people and the correct staffing levels need to be in place to do the work. More detail regarding Workforce Management recommendations can be found in Breach 4: Workforce Planning section of this report.

4.6 Establish a school of Trust Management to deliver all trust-related training, within DOI University

Effective knowledge management is key to evolving and improving DOI's ability to provide efficient, quality services. Leading industry practices have shown that rewarding resources for developing expertise in a specific business process or technology increases job satisfaction while providing repositories of knowledge in the organization.

DOI needs to establish a single organization to develop, coordinate, and lead Trust Management training and workforce planning efforts. Trust-related training includes non-system as well as system training. This organization must be integrated into the operational framework of the Trust organization. To deliver Trust training, EDS recommends creating a school of Trust Management within DOI University. Courses would be offered primarily through DOI University's four learning centers located in Albuquerque, Denver, Anchorage, and Washington, DC. As necessary, courses could be offered on-site at field offices or at local universities. Specialized seminars or courses could be offered outside of DOI University as required, including initial training for systems such as TAAMS. More detail regarding the proposed school of Trust Management can be found in the HLIP 10: Training Subproject section of this report.

5. Improve Trust Processes and Apply Industry Standards



DOI must begin the effort to realign their Trust processes with the fiduciary responsibility and beneficiary-centric model. Processes will have to be revised to conform to the new business model and be augmented by appropriate business applications and technology. Processes will also need to conform to the revised organizational model to ensure that they are consistent with roles and responsibilities that emerge from this recommendation.

Observations and Findings

Trust Reform projects are structured in "silos" without a common schedule and approach. With a separate project "silo" for each HLIP subproject or breach it will not be possible to coordinate common deployment dependencies and milestones between these projects. Requirements continue to evolve, and will not stabilize until implementation scopes are fixed.

Trust business processes frequently cross organization boundaries, resulting in a lack of accountability, organizational conflict, and a disruption of workflow as evidenced by prevalent backlogs.

Trust functions and services are frequently perceived as unresponsive, performed without urgency, and with little coordination across various workgroups performing related functions. A

root cause of this perception is a lack of visibility and coordination of workflow. As work is passed laterally within the DOI from one organizational "silo" to the next, it is frequently queued with unpredictable priority in the next organizational "silo".

Common business practices provide capabilities to reduce the costs and inefficiencies of business administration. The process of inheritance creates a division of interest in the original asset or account to multiple people. Trust industry standards commonly provide for policies and processes to either close, buy out, or otherwise minimize the administrative burdens placed by accounts which are very small or have minimal activity. With the Indian Trust, this fractionation of interest becomes very cumbersome for managing and accounting purposes. Fractionation results in small IIM accounts that may offer very little benefit to the account holder. Operationally, these accounts are very expensive to maintain and present additional issues beyond their sheer volume. Because the account values are often very low, there is little or no incentive for the account holder to communicate with OTFM. This compounds existing "whereabouts unknown" problems. Pilot program studies of the efforts and costs to administer fractionated interests have indicated that unless significantly reduced or eliminated, the workload burden may overwhelm management resources.

A significant number of escheated interests have yet to be redistributed to the estates of decedents and subsequently, to their proper heirs, in accordance with the 1997 *Babbitt v. Youpee* decision. The *Youpee* redistribution backlog elimination efforts have been limited to BIA's Southwest Region.

Detailed Recommendations

5.1 Prioritize business processes critical to the delivery of Trust services under the new operating model

As an initial step, critical processes should be identified and priorities should be established for the redesign effort. No organization can accommodate overnight global change, so it is necessary to develop a methodical approach to work through process redesign. Processes that have the most far-reaching effect on achieving Trust Reform objectives are obvious candidates for early redesign. However, this must be balanced against the ability of the organization to assimilate the change resulting from the redesign.

A Steering Committee should be named and engaged before work is done on this recommendation. By participating throughout the redesign effort, they will understand the decisions made, have increased ownership of the Architecture, and be accountable for business performance.

5.2 Redesign and implement process improvements

Efficient performance of business processes requires clear definition of initiating events, boundaries, and outcomes. Under this recommendation, DOI should begin the effort to redesign and implement key processes. The focus of this effort must be on the efficiency of the processes. Organizational barriers must be broken down and redundancies and unnecessary steps eliminated from processes. Critical success factors and metrics should also be identified to help determine the success of implementation.

As part of this recommendation, DOI should evaluate existing Trust Reform subprojects to determine if combining these tasks would increase efficiency from a process perspective. Currently, many of these subprojects operate as independent efforts, yet they are closely aligned

from a process point of view. The separation of these subprojects should be evaluated to determine if efficiencies could be gained by combining these efforts.

5.3 Provide capability to mitigate fractionation of interests

The Indian Trust must mitigate fractionation of interests to reduce its administrative burden. EDS recommends a voluntary buy-back program, learning from the pilot effort in the Great Lakes region. Funding could be split between the Tribe and the Trust, based upon a realistic estimate of administrative savings, with the resulting interest remaining with the Tribe. It is imperative that both Tribal and IIM Beneficiaries participate in determining the objectives and guidelines for such a program. For fractionated interests not resolved through the voluntary program, an arbitrated or mediated settlement should be made available.

Additionally, EDS recommends for the Trust to propose an arbitrated or mediated settlement with the reported 13,000 interested parties impacted by the *Babbitt v. Youpee* decision. The Trust should, if required, petition Congress for supplemental funding sufficient to facilitate complete settlement.

5.4 Identify candidate processes for externally contracted services, determining appropriateness, scope and timeframe

As part of the process analysis, DOI should identify candidate processes that are more appropriately performed by outside vendors. This will allow DOI to focus resources on the tasks that are inherently governmental and use the private sector when efficiencies can be gained through outsourcing. This process has already begun in some areas such as records management, but more opportunities may be available for DOI to evaluate.

5.5 Use of deployment-based implementation approach

Many of the changes resulting from Trust Reform will have far-reaching implications for the DOI organization. In such circumstances, industry practice is to use a deployment or roll out approach that allows progress to take place, but tends to mitigate the disruption resulting from large-scale change. A deployment approach involves rolling out changes to a subset of the affected community, rather than a one-time, full-scale implementation. This approach also offers the advantage of applying lessons learned from one implementation to efforts that follow.

5.6 Evaluate the use of technology to support process improvement

DOI should assess the capability of technology to enable the process improvement effort. Many tools and applications exist that can be employed to significantly improve process flow and enhance information sharing. Given the beneficiary-centric approach, special attention should be paid to tools that can provide a conduit for information to beneficiaries and offer a means for two-way communication.

6. Establish Clear Metrics to Manage Trust Activities

Management of the Indian Trust should be based on clearly defined measures, which are derived from the Trust strategy, its goals and objectives. Process Owners and Operators then manage, track, and report status of these metrics on a regular basis. (See Breach 3: Computer & Business Systems Architecture Framework Plan section of this report for further definition of Process owners and operators.) An

example is dependencies or interactions could be clearly defined with a Service Level Agreement (SLA) for the timeliness, completion, and quality of results required. A second example is a Trust Management Performance Reporting tool for tracking and reporting key business measures. This would assist in leadership responsiveness and facilitate communication to Trust executives, stakeholders, and the Beneficiaries.

EDS recommends quantifiable, measurable, achievable business performance objectives, priorities, and performance improvements, which are approved by the Trust Board.

People and organizations perform best for criteria on which they are measured. If there is no measure or review of performance, there is a significantly reduced incentive to increase performance, and no clear communication on how to achieve such an improvement. To achieve satisfactory results, the Trust must first obtain agreement on what should be measured and what objectives or improvements are expected. This should be established in conjunction with redesigning the Trust business processes, and documenting the Enterprise Architecture.

Observations and Findings

Expectations of performance and improvements are not clearly defined, quantified, measured, and communicated. As a result, the Trust has difficulty meeting expectations of its constituents and employees, and has not developed a common understanding of what constitutes Trust Reform success.

Trust functions, even when well managed within their own area, result in perceived unresponsiveness. Frequently, requests for services between workgroups are managed through metrics and priorities varying by department or location, resulting in perceptions of a "lack of urgency" or that "backlogs are normal". Each functional "silo" prioritizes its own backlog, without clear agreement on expected time or quality of closure by the requestor.

Major activity milestones within the Trust Reform have conflicting status, such as "ongoing efforts", and "completed". This provides limited visibility and no quantifiable means of assessing progress.

During interviews the EDS team observed that the Trust reform projects have difficulty assessing status or clearly determining project progress. For most of the subprojects, milestones do not provide a good measure of project progress against the objectives stated in the HLIP. Performance metrics that measure progress against the plan have not been defined.

Detailed Recommendations

6.1 Identify key management functions and processes to be measured for organizational performance

Congress has introduced important legislation, including the Government Performance and Results Act of 1993, Clinger-Cohen Act of 1996, and the Federal Managers Financial Integrity Act, that attempt to rectify significant weaknesses within federal agency operations and management. By paving the way towards greater accountability for achieving results, these two laws provide a unique opportunity for developing fully integrated information about the achievement of agencies' missions and strategic priorities.

EDS recommends using these three statutes as a basis to identify what potential processes and functions need to be measured to track and report success in areas impacting Trust activities. The

Indian Trust will identify functions and related activities for measuring success in areas that tie back to the strategy, goals and objectives of the new beneficiary-centric business model.

6.2 Define Performance Metrics

EDS recommends that the DOI adopt commercial standards whenever Departmental Trust responsibilities do not specifically require specialization. Initial performance standards and benchmarks must be set high enough to retire procedural backlogs within a reasonable period of time. Ongoing benchmarks must enable the Department to quickly determine if organizational productivity is falling behind the incoming workload so that personnel and procedural changes can be made before beneficiary service levels are impacted.

Using the performance metrics developed through the method above, Indian Trust will be able to baseline organizational performance and productivity. This baseline can be used to identify where additional resources will be required to overcome initial procedural backlogs. The baseline will also be used to evaluate progress toward Reform objectives on an ongoing basis. Once the performance metrics are in place, Indian Trust will be able to evaluate the impact of program operations on achieving mission objectives and the ability of Information Technology to support program operations.

6.3 Develop collection and reporting mechanisms for performance metrics

Performance metric reporting enables quick identification of areas requiring executive attention. Individuals can then view those components of overall performance appropriate for their roles and responsibilities. Two trust reporting tools would support this effort. The first would report Trust Reform progress, the second would report Trust business operations. This would enable leaders to identify and address issues before they impact overall progress toward Reform objectives.

V. Trust Reform Roadmap and Framework

1. Introduction

EDS has identified high level and detailed recommendations that, if implemented, should position Trust Reform to be successful with an organization in place to ensure that the focus on fiduciary duties is embedded in trust business processes. The recommendations contained in the Overall Trust Reform as well as Subproject and Breach sections are summarized in a series of Roadmaps included in this report. The purpose of these roadmaps is to provide high level guidance in moving forward from the current state to the desired future state of Trust Management. The Overall Trust Reform Roadmap is included in this section and is labeled as Figure 1. Additionally, see section VI of this document (sub-section 3.0) for roadmaps of each HLIP and Breach project assessment.

Most of the recommendations contained in this document concentrate on specific changes to improve the performance of Trust Management. Examples of these are TAAMS title and the data cleanup efforts. In addition to these focused recommendations, other recommendations are included to address the Department's need for a systematic, ongoing process to sustain and improve Trust performance. This process, referred to as the "Trust Reform Framework", is described later in this section and is illustrated in a fold out graphic.

2. Roadmaps

The roadmaps highlight each of the primary report recommendations and are referenced accordingly. The information presented for each recommendation includes duration estimates in increments of quarters of years, relative starting points and expected outcomes and benefits. This information is included for planning purposes and is intended to depict the sequence of work to implement the recommendations. Once selected, further refinement is needed to identify and define the scope of the projects required to implement the changes and to determine their specific resources, dependencies and priorities. Resource constraints and other operational limitations were not identified or considered in the creation of the roadmaps.

The roadmaps reflect the complexity of the current Trust environment and the need to incorporate objectives and priorities of all stakeholders (e.g., departmental organizations and other governmental agencies, Tribes and representatives of the Native American beneficiaries).

A number of these recommendations will improve current operations, establish a firm foundation for subsequent efforts and can be completed within the first 24 months. Some specific examples follow:

- **Develop a fiduciary duty focus and strategy to trust management.** This will enable the DOI to properly account for and manage Indian Trust Fund assets, prepare accurate and timely reports to account holders and to maintain complete, accurate, and timely data regarding the ownership and lease of Indian lands.

- **Develop a fiduciary and beneficiary focused business model.** This will provide a valuable management tool that the DOI can use to establish a common "language" for the entire Trust community to describe Trust work and business processes, target

areas of the business for improvement and to frame, scope and estimate needed improvement solutions.

- **Create an organization model with adequate resources.** This will position the DOI to consolidate Trust authority over the functional organizations needed to execute, maintain and manage Trust activities.

- **Establish clear metrics to manage trust business and assess performance.** This will enable the DOI to set quantifiable goals, design fact-based plans and improvements and effectively monitor their effects on Trust operations.

The roadmaps summarize the recommendations over a three-year or twelve quarterly periods. Some recommendations require work that will extend beyond the illustrated timeframe. For these recommendations, an "@" sign is used to indicate that ongoing work is required. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
IV. 1. Develop a Fiduciary Duty Focus and Strategy to Trust Management	21	■	■	■	■	■	■	■						• Fullfillment of fiduciary responsibilities • Alignment of Trust objectives and results with Beneficiary expectations • Investment alternatives for Trust Fund accounts • Beneficiary involvement in managing and monitoring land use
IV.1.1 Define and implement strategic objectives and priorities	9	■	■	■										
IV.1.2 Seek legislative change to provide Trust Fund investment alternatives to the Beneficiary community	21	■	■	■	■	■	■	■						
IV.1.3 Develop a proactive approach to land management and review	6						■	■						
IV. 2. Create a Beneficiary Approach to Trust Activities and Service Delivery	@	■	■	■	■	■	■	■	■	■	■	■	@	• Improved communications and personalized interactions with Beneficiaries • Establish standard capabilities for Beneficiary interaction
IV.2.1 Support direct Beneficiary interaction through multiple delivery channels	@		■	■	■	■	■	■	■	■	■	■	@	
IV.2.2 Provide communication and interaction with Beneficiaries regarding Trust Reform	@	■	■	■	■	■	■	■	■	■	■	■	@	
IV. 3. Develop a Fiduciary and Beneficiary Focused Business Model	21	■	■	■	■	■	■	■						• Enterprise Architecture supporting consistent, timely, accurate performance of Trust functions and services • Well-communicated Trust policies, processes, and procedures
IV.3.1 Develop a comprehensive Enterprise Architecture	21	■	■	■	■	■	■	■						
IV.3.2 Develop Trust Reform Transition Plan	4	■												
IV. 4. Create an Organizational Model with Adequate Resources	17	■	■	■	■	■	■	■						• An accountable, responsible organization staffed to effectively achieve Trust objectives • A Board providing Trust objectives and priorities, consisting of Tribal, IIM Accountholder, industry, and Trust resources • Timely, accurate measurement of: - Trust services - Reform project progress
IV.4.1 Appoint a single Executive Sponsor responsible for all Trust and Trust Reform functions and services	6	■	■											
IV.4.2 Establish a Trust Board	6		■	■										
IV.4.3 Establish Office of Standards	6		■	■										
IV.4.4 Establish an Office of Indian Trust Transition	3	■												
IV.4.5 Develop a comprehensive Workforce Management capability to attract, develop, and retain qualified resources	18		■	■	■	■	■	■						
IV.4.6 Establish a school of Trust Management to deliver all Trust-related training, within DOI University	13			■	■	■	■	■						

Figure 1. Overall Trust Reform Roadmap

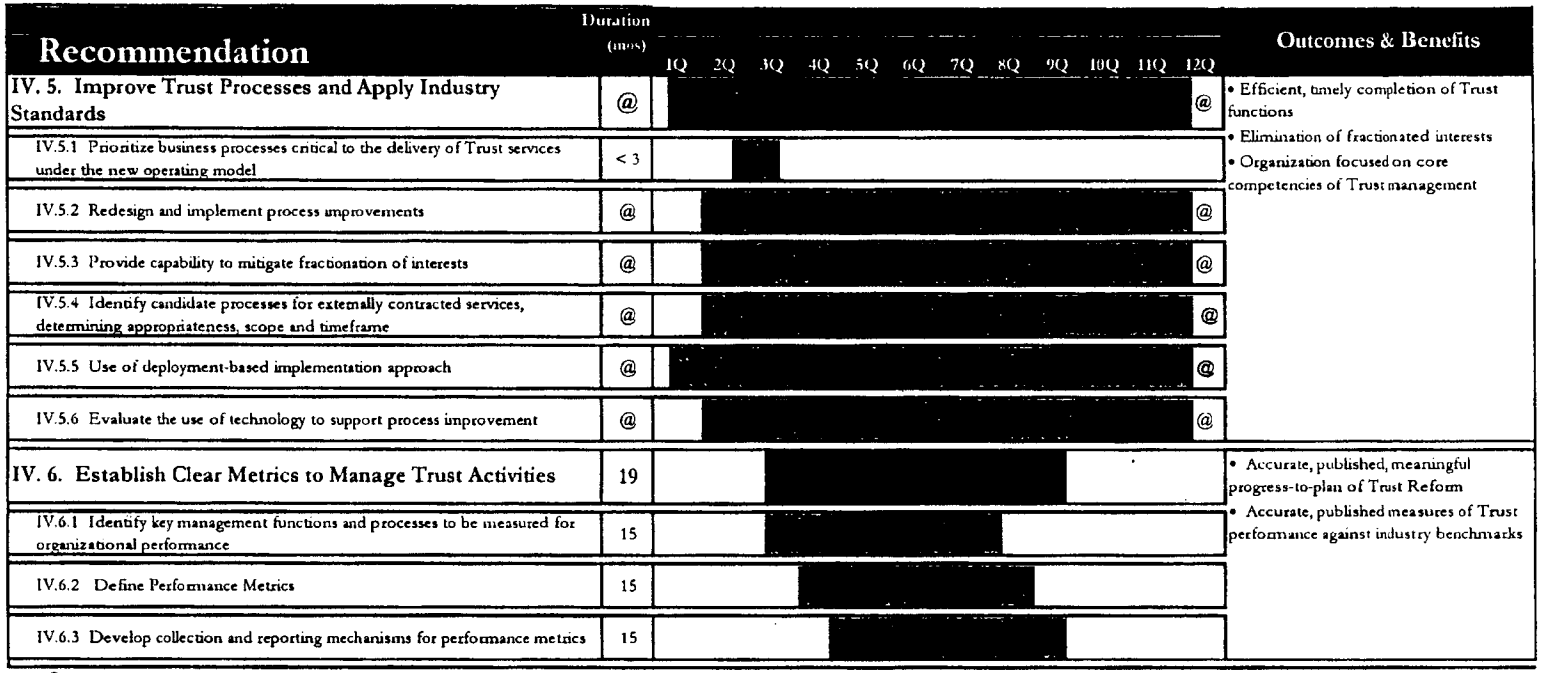


Figure 1. Overall Trust Reform Roadmap, continued

3. The Trust Reform Framework

The Trust Reform Framework, depicted in the foldout graphic which follows, is an ongoing process for the DOI to continuously improve its management of Indian Trust. It provides an approach to ensure that trust business strategies are implemented through focused, actionable improvement solutions. The framework itself is based on the detailed recommendations contained in this report. While not all-inclusive, important recommendations that must be acted on in the near term are illustrated in the framework.

To begin working with the Trust Reform Framework, the first activity is establishing the management organization and assigning leadership roles and responsibilities. The Executive Sponsor, in coordination with the Trust Board, develops business strategies to align and guide the activities of the Trust enterprise.

Once business strategies have been developed, the Executive Sponsor identifies and manages the "system" of trust business processes to ensure their integration and effective operation. Trust processes that must improve to achieve business strategies will be targeted and goals set for needed improvement. In the next step, the integration of process, technology and data, and organization and people is highlighted. "Process Owners" are appointed and must be accountable for improving and maintaining the performance of Trust processes. Owners who receive improvement objectives initiate comprehensive assessments of their processes. The assessments focus on fundamental process designs and the support and enabling capabilities of technology and data. The assessments also include the design of organization structures needed to effectively perform business processes and the people who must be trained, measured and rewarded to enable and encourage them to work effectively.

The results of Trust process assessments reveal opportunities to improve performance and provide for the selection of solutions. Solution alternatives are evaluated and selected based on their improvement potential to integrate and coordinate change to all of the assessment areas mentioned above. Activities such as benchmarking and metrics development must occur. In addition, decisions are made to determine candidate processes for outsourcing, in-house development or commercial purchase.

The selection of the integrated solutions facilitates specific design solutions. The solutions are scoped in the context of the business process model, and data and technology architectures. The impact to organizations and people should likewise be known and designed into the solution. Process Owners can then accurately estimate and develop business cases for the needed improvement projects. The business cases are presented for review and funding if they are approved.

Once the improvement solutions have been approved, implementation plans are developed. Review, testing and acceptance criteria is established. The Trust Program Management Center oversees, tracks and reports on implementation progress. The implementation plan is performed based on the rate of change acceptable to the organization. Review schedules are established to monitor the progress of the implementation and to address implementation issues and obstacles.

Following the implementation, improvements are closely monitored in all areas where they were implemented to ensure consistent conformance and practice.

Process measurements track ongoing effects. When process performance has stabilized, results are evaluated to determine the actual improvement performance against plan and are factored into the development of revised and new business strategies. The evaluation of

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results is critical in validating that improvements are yielding desired results. The Trust Program Management Center updates appropriate process measures to reflect the effects of the improvement.

4. Elements of the Trust Reform Framework

The Trust Reform Framework is a process to improve Indian Trust performance. Its intent is to enable the DOI to fulfill its fiduciary responsibilities in managing Indian Trust. Ongoing Tribal consultation will provide the understanding necessary to create and implement effective Trust business strategies. A beneficiary-focused approach, throughout all of trust management, will help to ensure that Tribal requests are considered.

The Trust Reform Framework is based on the guiding principles of fulfilling fiduciary responsibilities to manage Indian Trust and the development of a beneficiary-focused approach with Tribal consultation. The horizontal dimensions of the Trust Reform Framework are structured around the four Enterprise Architecture components that were introduced in Section III. Change Implementation Components. The use of these components, within the context of the Trust Reform Framework is described here:

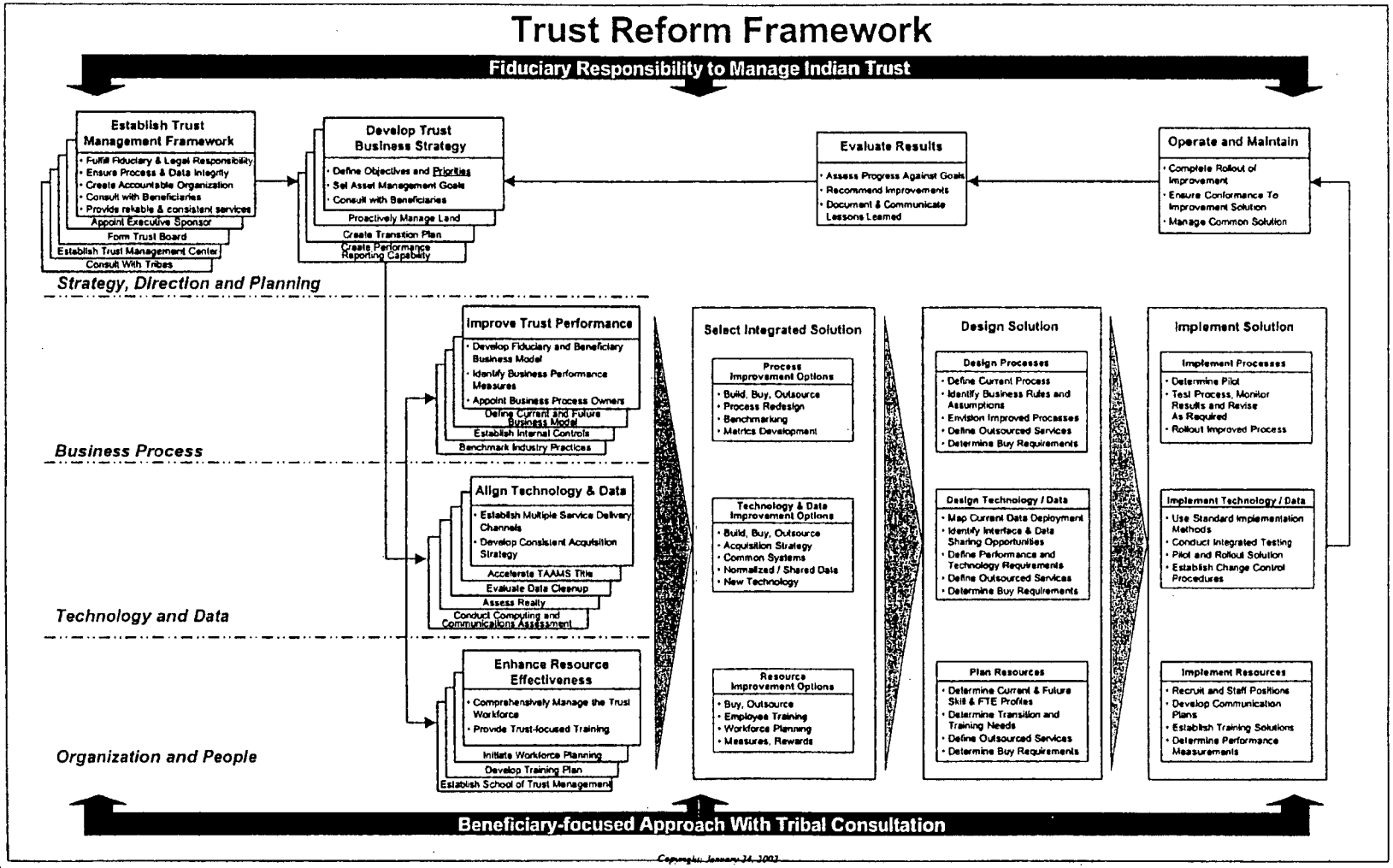
- **Strategy, Direction & Planning** – the Trust Management Framework is established and objectives and strategies drive the improvement required by Trust Management. The focus is to ensure the effective performance of the entire "system" of trust business processes through their overall integration and improvement.

- **Business Process** – a process-based approach is used to determine where to focus improvement efforts to achieve objectives and strategies. Goals are set for the required levels of process performance improvements. Plans to achieve the improvements are reviewed for sufficiency and integration.

- **Technology & Data** - the potential for how technology and data can better support and enable business performance is evaluated. Ongoing analysis ensures that technology and data investments are aligned with business strategies.

- **Organization & People** – organization structures are designed to effectively perform business processes and serve the needs of beneficiaries. People are trained, measured and rewarded to enable and encourage them to work effectively.

While there is a logical flow of the Trust Reform Framework process steps, they are not necessarily limited to being performed sequentially for each improvement. The broad scope of this closed-loop process enables various improvement efforts to be conducted concurrently by multiple groups and individuals. The following table explains in detail the steps of the Trust Reform Framework.



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Trust Reform Framework Process Steps	Descriptions
Establish Trust Management Framework	This step establishes the roles, responsibilities and organizations that are necessary to manage and oversee Trust Management. Trust leaders assume their fiduciary and legal responsibilities. The Executive Sponsor is appointed and, with collaboration of the Trust Board, will become intimately familiar with Tribal needs. The Trust Program Management Center is established to provide program management support.
Develop Trust Business Strategy	Based on their fiduciary responsibility and understanding of Tribes and individual Indian needs, Trust leaders develop business objectives and strategies to direct and align enterprise improvement activity. Methods to measure and monitor business performance are established. Specific processes are targeted to achieve improvement goals.
Improve Trust Performance	This step acts on the process improvement mandates set in the previous step. Process Owners are appointed to drive the definition of the process, establish process performance measure, assess current process performance and identify improvement opportunities. The assessments evaluate all of the components of the Enterprise Architecture: process design, Technology & Data and Organization & People.
Align Technology & Data	Process Owners, in their assessments, consider the quality of technology and data in support of process performance.
Enhance Resource Effectiveness	Process Owners, in their assessments, consider the effectiveness of the workforce to process performance.
Select Integrated Solution	Process Owners and Trust Leaders will evaluate assessment results that indicate the need to improve performance levels and decide how it can best be accomplished. Internal and external options (buying commercial software, outsourcing) will be considered. Applicable improvement approaches will be determined.

Trust Reform Framework Process Steps	Descriptions
Design Solution	Solutions to improve process performance will integrate all of the components of the Enterprise Architecture: process design, Technology and Data, and Organization and People. For example, if process redesign is required, it may also require changes in Technology & Data, and Organization & People (number and training of staff).
Implement Solution	Once the integrated solution and improvement approaches have been determined, implementation plans will be developed and deployed. Review, testing and acceptance criteria will be established. The Trust Program Management Center will oversee, track and report on implementation progress.
Operate and Maintain	The improvement will be monitored in all areas where it was implemented to ensure consistent conformance and practice. Process measurements will be monitored to determine the ongoing effects of improvements.
Evaluate Results	The progress and impact of improvements will be evaluated to: • Assess the actual rate and cost of improvements versus what was planned. • Monitor changes in skills and culture required to support improved processes. • Assess actual effects of improvements on process measurements versus what was anticipated. • Evaluate the impact on measurements of other processes. • Provide feedback into the formulation of business strategies. • Make changes where required.

VI. Subproject and Breach Assessments

A. HLIP 1: OST's IIM Administrative Data Cleanup

1. Overview

1.1 Description

This subproject was initiated because documentation and supporting data in the Individual Indian Monies (IIM) module of BIA's Information Resources Management System (IRMS) and IIM file folders (account holder's paper file folder containing account documents) were not maintained consistently throughout BIA and OTFM field offices. Numerous deficiencies existed in the data because of inconsistent application of any "standard" method of data input, account/data review, or standardized use of Tribal Codes, Alpha Codes or Management Codes.

In this subproject, the OST is standardizing and verifying IIM system data for Trust administrative records, and recommending corrections and establishing an inventory of hard copy records used daily for each Trust fund account. These tasks often involve BIA in policy decisions, review and implementation. A critical aspect of the Trust fund reform effort is the Cleanup of IIM data in the system, along with compiling credible information in IIM file folders. The project to Cleanup the IIM database is designed to standardize and verify the data housed in the current IIM system. Additionally, the project provides an inventory of the hard copy records, determines its condition and recommends any corrective actions. A quality review team checks and verifies the corrective actions. The desired results are:

- Every Region/Agency/Tribe will obtain the most complete and accurate information possible for each account holder and this information will be reflected properly in TFAS.
- Every Region/Agency/Tribe will use a standard set of codes to open and maintain accounts in the Trust Funds Accounting System (TFAS).

Every IIM account will have a file folder with documentation regarding the management of that individual account. The work on this subproject involves several BIA Regional and Agency Offices. The principal site for the effort is in Albuquerque, New Mexico, at the site leased by the cleanup contractor.

The OST Data Cleanup Subproject and its procedures development are an essential step in providing accurate and reliable account information in a timely manner to account holders. Use of accurate systems data provides the opportunity for the following requirements of the Trust Reform Act of 1994, to be specifically addressed:

- Provide adequate systems for accounting for and reporting Trust fund balances.
- Provide adequate controls over receipts and disbursements.
- Provide periodic, timely reconciliation to assure the accuracy of accounts.

- Determine accurate cash balances.
- Prepare and supply account holders with periodic statements of their account performance and with balances of their accounts which shall be available on a daily basis.
- Establish consistent, written policies and procedures for Trust fund management and accounting.
- Provide adequate staffing, supervision, and training for Trust fund management and accounting.
- Provide proper accounting for investing funds, and maximizing, in a manner consistent with the statutory restrictions imposed on the Secretary's investment options, the return on the investment of all Trust fund monies.
- Prepare accurate and timely reports to account holders (and others, as required) on a periodic basis regarding all collections, disbursements, investments, source of funds, and return on investments related to their Trust accounts.

This subproject directly supports TFAS. Improvements that are produced in the Probate, Records Management, Policies and Procedures, Training and Internal Control Subprojects will have a positive impact on and influence the effectiveness of the OST Data Cleanup effort and IIM data management in the future.

1.2 Current State

Interviews with key staff and examination of related source documents indicates that substantial progress has been made toward achieving the goals identified in HLIP for OST data cleanup. DOI has organized the cleanup effort; conducted a variety of test cleanups; made appropriate adjustments to the cleanup process; and acquired contractor support for cleanup. OST also worked with the TFAS pilot effort to align data cleanup with TFAS needs.

OST began the major cleanup effort with the gathering and cleanup of administrative Trust records for the Western Region. This entailed over 33,000 IIM files and was completed in March of 1998. This effort was followed by the collection and cleanup of IIM administrative Trust folders and records from all 12 BIA regions. The cleanup of records for TFAS pre-conversion purposes was completed as of September of 1999. However, three tribes registered objections to the removal of active files for cleanup and this issue has not been resolved to date. During the course of the OST data cleanup effort, a number of additional data cleanup issues were identified. These efforts include:

- Post conversion cleanup.
- Locate missing documents.
- Revise management coding.
- Continue research and resolution of "whereabouts unknown" accounts.
- Resolve special deposit account issues.
- Settle issues with small balance and inactive accounts.
- Resolve accounting discrepancies.

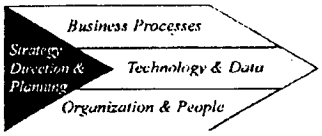
These efforts are currently ongoing and at various stages of completion. Coding issues are being addressed and substantial progress has been made, but continued efforts are necessary to cleanup management coding and alpha coding. Missing documents efforts are also ongoing with an initial phase aimed at unrestricted accounts with annual disbursements over $5,000. This phase resulted in an 88% success rate in obtaining mandatory documents. Whereabouts unknown (missing or inaccurate account holder permanent address) issues continue to be a significant problem with the actual number of such accounts growing from approximately 46,000 to 64,500 between October 1997 and August 2001. This growth occurred despite the location of 23,000 owners from the 1997 whereabouts unknown inventory. In other words, the original universe of whereabouts unknown accounts was cut in half, but 41,500 new such accounts were added to the inventory. A pilot project to resolve special deposit accounts is currently ongoing with the expected national rollout to be determined based on pilot results. A method for closing zero balance, no activity accounts has been established within TFAS, but small balance, inactive accounts continue to represent an unresolved issue.

1.3 Recommendation Summary

EDS recommends that DOI combine data cleanup efforts into a single effort to recognize the close connection among these projects. By combining the efforts, DOI can minimize redundancies and more effectively share information across the several data clean up efforts. Establishing a process view will enable DOI to avoid similar data collection errors in the future.

2. Analysis and Recommendations

2.1 Combine Data Collection and Cleanup Efforts



There are currently a number of projects and groups responsible for the cleanup and collection of data for Trust Reform purposes. In addition to OST Data Cleanup, data collection and cleanup efforts include BIA Data Cleanup (HLIP), the Missing Data Breach and historical data collection under the newly created Office of Historical Trust Accounting (OHTA). There is a significant degree of overlap among these projects, to the extent that it is difficult to clearly define boundaries and responsibilities.

This recommendation is designed to pull the OST Data Cleanup and BIA Data Cleanup together into a single effort. It also acknowledges the need for close coordination between these efforts and the work conducted by OHTA to collect missing information from third parties. The recommendation recognizes that each of the data collection/cleanup efforts is attempting to supply the necessary data associated with the end-to-end Trust cycle. By combining the efforts, it will be easier to eliminate duplication of effort and share information collected. By taking an overall process view, it should also be possible to clearly identify the dependencies in the cycle, helping to avoid data collection errors in the future. The approach should also help define how historical data collection/cleanup efforts fit into ongoing Trust activities.

Described below are the basic steps required to implement the above recommendation. The detailed recommendations are presented in rough sequential order although some steps may be

accomplished simultaneously. The focus of the detailed recommendations is on the immediate steps that must be taken toward implementation.

Observations and Findings

From a business process perspective there are not clear distinctions among the data collection/cleanup projects. It is not readily apparent where one project ends and others begin.

The missing data breach is basically a subset of all other data collection efforts. Operating the breach as a separate project opens the door for substantial duplication of effort.

Communication among the projects is very limited, substantially increasing the potential for duplication of effort.

Operating each of the efforts as a separate project ignores the "process" view. As a result, the efforts may resolve existing data gaps, but not correct core process problems. This may lead to future data problems and affect data accuracy as new systems come on line.

Operating the efforts as separate projects opens the door for data gaps as each project assumes that information will be provided under another effort.

The fiduciary responsibility to provide an IIM account holder an accurate statement of the account relies on the entire business process. To produce an accurate quarterly statement the DOI must have an accurate balance, accurate account information, accurate administrative information (ie. Mailing addresses), accurate disbursement information, etc. This fiduciary responsibility is completed through one business process. The current boundaries used to breakup responsibilities for this process has created unnecessary and inefficient "silos" of effort.

Detailed Recommendations

2.1.1 Define process flow and data dependencies

The initial step in the effort is to develop an end-to-end process flow and the related data dependencies. This will help define the data requirements to support the entire cycle and identify how data collected in early phases of the cycle affect downstream activities.

2.1.2 Identify project roles and responsibilities

As currently structured, the process defined above will cut across organizational lines. This step will serve to define how each part of the organization will contribute to the cleanup effort. It will also help to define how the various parts of the organization will communicate and share information.

2.1.3 Develop a project communication plan

This step is designed to formalize the communications process and ensure that all parties are fully aware of relevant information as the project moves forward.

2.1.4 Determine data collection/cleanup priorities

As indicated in the overview of the OST data collection effort, the collection/cleanup effort is extensive. In this step, the priorities for the project will be determined. These priorities should be based on the potential contribution to Trust Reform in the short run. This prioritization effort is

not intended to exclude areas from data cleanup, but rather focus early efforts on areas that provide the greatest return to Trust Reform in the short run.

2.1.5 Target missing data as it relates to the priorities described above

As the project team moves through the cleanup process, missing data will be identified that cannot be obtained through the normal internal channels. This data will be defined and collection alternatives will be evaluated. This will help focus the missing data effort on the collection of data that is most important in supporting the overall process.

It should be noted that the recommendations above must be balanced against existing organizational realities and ongoing project efforts. The recommendations are designed to build on and accelerate cleanup efforts currently underway. Caution must be exercised to ensure that the transition to the combined project effort does not lead to delays in progress toward Trust Reform.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
A.2.1 Combine data collection and cleanup efforts	6													• Allows DOI to reduce redundancies and more effectively share information across the data collection efforts
A.2.1.1 Define process flow and data dependencies	6													
A.2.1.2 Identify project roles and responsibilities	< 3													
A.2.1.3 Develop a project communication plan	< 3													
A.2.1.4 Determine data collection/cleanup priorities	< 3													
A.2.1.5 Target missing data as it related to the priorities described above	< 3													

@ - Indicates ongoing efforts

B. HLIP 2: BIA Data Cleanup and Management

Refer to Interim Report Published November 12, 2001

C. HLIP 3: Probate Backlog

1. Overview

1.1 Description

The Secretary of DOI is charged with administering Trust and restricted resources for the benefit of individual Indian owners. Consequently, federal law permits Indian resource owners to pass title to their Trust assets by testamentary devise or by intestate succession. Therefore, a fiduciary duty is imposed upon the Secretary of determining the legal heirs to the Trust assets in a process known as *probate* following the death of an Indian Trust asset owner.

Both BIA and OHA were tasked by the February 2000 HLIP to inventory, identify and develop action plans and procedures to eliminate the existing probate backlog. BIA and OHA were also tasked by the HLIP with implementing the recommendations of the July 1999 DOI Indian Probate Reinvention Lab Final Report to streamline and improve the entire probate process. The Probate Reinvention Lab Team recommended redesign and reduction of the existing 64-step probate process into a more manageable 19-step process. Its recommendations centered on permitting probate decisions to be delegated to their lowest operational level, eliminating non-value-added probate process steps, and reducing the total probate processing time from three to six years to a more reasonable 18 months. Consequently, Probate Reinvention Lab recommendations have largely been incorporated into the 2000 HLIP probate backlog elimination effort and have been accomplished with varying degrees of success. In general, the incorporation effort was designed to further streamline probate procedure so as to more efficiently and effectively provide beneficiary service while precluding the complicating occurrence of future probate backlogs.

Existing probate backlogs were identified in five specific areas: probate case processing, summary distributions, Land Title and Records Office (LTRO) posting and recordation, *Youpee* case redistribution, and probate cases awaiting OHA adjudication. In accordance with its HLIP mandate, BIA and OHA queried their respective regional offices and identified existing probate backlogs within each of the five itemized categories.

1.2 Current State

Within each of the probate backlog areas, specific numbers of backlogs were identified across all BIA and OHA regions. Backlog elimination progress has been realized in certain areas while only temporary backlog elimination gains have been realized in others. Further, certain areas have reportedly experienced negligible backlog elimination progress. The overall lack of sustained, across-the-board probate backlog elimination appears to be due, in large part, to the lack of a coordinated, near-term plan and deadline for the complete elimination of probate backlogs in all of the five specific areas addressed above. Additionally, the lack of probate backlog elimination progress has reportedly been attributed to the lack of adequate funding to conduct an across-the-board elimination effort. However, the incremental approach to probate backlog elimination being exercised particularly within BIA, serves only to shift the burden of backlog elimination among the five areas specified above. Further, the failure to ensure prompt, coordinated, complete, permanent and near-term probate backlog elimination arguably violates the fiduciary duty owed by the DOI to the Indian Trust beneficiaries.

In accordance with Office of the Special Trustee (OST) direction in an effort to address probate backlogs:

- A pilot study was initiated to assess time and budget concerns related to the elimination of case processing probate backlogs. BIA contracted with an outside contractor to eliminate the 5,400 identified case processing probate backlogs residing within BIA's twelve regions. However, due to a variety of reasons including the slower than anticipated learning curve and training requirements of a probate backlog elimination contractor, coupled with pilot study delays and slow nationwide rollout, significant case processing probate backlogs remain.

- Backlogged summary distributions were detailed to the newly hired and empowered Attorney Decision Makers (ADMs) for processing and elimination. BIA, with OST authorization and funding, hired and authorized ten ADMs and support personnel to process the 1,238 identified backlogged probate cases capable of being decided via a summary adjudicatory process. To date, nearly half of the backlogged summary distribution cases have been adjudicated.

- LTRO post-adjudication posting and recordation backlogs were handed over to a contractor for processing and backlog elimination via a pilot study in three of the six LTROs. The LTRO pilot study initiated in the Great Plains, Southwest, and Northwest LTROs, has now been expanded to all six LTROs. Contracted backlog elimination services have yielded certain progress within each LTRO. However, the unique nature of the LTRO posting and recordation procedure has required full-time use of existing LTRO leading title examiners to certify contractor-generated backlog elimination. Consequently, since existing LTRO leading title examiners are required to certify contractor work product, current posting and recordation efforts within each LTRO have reportedly been allowed to slip into a backlogged status, further exacerbating the backlog elimination effort. However, due to the direct use of contracted backlog elimination services and despite the reallocated certification efforts of leading LTRO title examiners, overall LTRO posting and recordation backlog elimination efforts are reportedly beginning to succeed.

- A pilot study was initiated to assess time and budget concerns related to the redistribution of *Youpee* case interests. The *Youpee* time and budget study, conducted at the Pawnee Agency and the Southern Plains LTRO, consumed better than 16 months from initiation until it was ultimately rolled out into one of BIA's 12 regions for region-wide redistribution. An exceedingly small percentage of the identified 178,000 restricted and Trust interests impacting 13,000 estates have reportedly been redistributed to date.

- OHA hired and placed additional adjudicatory personnel to facilitate the adjudication of its existing probate backlog and anticipated increase in caseload from BIA. OHA hired five of its funded 10 Indian Probate Judges and reopened four field offices in its efforts to eliminate the backlog of probates requiring adjudication. Given OHA's present probate adjudication backlog elimination rate, it is anticipated that by the end of FY2002, OHA will have completely eliminated its entire backlog of probate cases requiring adjudication.

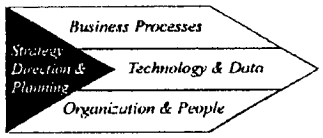
1.3 Recommendation Summary

To promptly and properly eliminate probate backlogs at all levels within BIA and OHA, the expanded, simultaneous and nationwide application of contracted backlog elimination services is an imperative. Within several key areas, existing BIA probate staffing and funding levels are insufficient to rationally assure the sustained performance of both probate and realty staff

operations in a manner that will ensure probate backlogs are not permitted to reoccur. Additionally, allowing probate summary distribution backlogs, *Youpee* case redistribution mandates, LTRO posting and recordation backlogs, and OHA adjudication backlogs to be eliminated in a slow, under-funded, step-wise progression, the goal of achieving elimination of all BIA and OHA backlogs will not be realized within HLIP tasked timeframes. Further, the narrow-scope and protracted nature of backlog elimination pilot studies, while admirably beneficial in design and purpose, have reportedly and directly contributed to the perpetuation and exacerbation of probate backlogs at several levels. All of the recommendations contained herein are designed to simultaneously eliminate the existing backlog of probate case processing, summary distributions, *Youpee* case redistribution, and OHA adjudication efforts. Finally, considerable thought should be given to a Congressionally mandated and fully funded negotiated settlement in the *Youpee* matter.

2. Analysis and Recommendations

2.1 Promptly Eliminate Probate Backlogs



Following the death of an Indian Trust asset owner, the Secretary of the DOI must exercise a fiduciary duty in a process known as *probate* designed to determine the legal heirs to Indian Trust assets. Failure to promptly provide Indian probate services arguably violates the fiduciary duty owed Indian beneficiaries. Therefore, the importance of prompt, complete and simultaneous elimination of all five types of probate backlogs (e.g., case processing backlogs, summary distribution backlogs, LTRO and agency posting and recordation backlogs, *Youpee* case redistribution backlogs, and probate case backlogs awaiting OHA adjudication) cannot be understated. Consequently, due to the large volume of probate backlogs requiring attention, the nationwide application of contracted services focused exclusively on backlog elimination is necessary.

Observations and Findings

BIA was originally tasked with completing its summary distribution backlog work by December 2000. However, following a one-year extension to its original deadline, BIA is currently tasked with completing its summary distribution backlog work by December 2001. Additionally, BIA was tasked with eliminating its backlog of probate cases greater than 90-days old and forwarding the same over to the OHA not later than December 2002. OHA was tasked with deciding all cases on its docket greater than 12 months old by September 2001. Further, BIA was tasked with eliminating all posting and recording backlogs within its six LTROs by December 2001. Finally, BIA was tasked with resolving all of its *Youpee* cases and affecting redistribution of assets by September 2004.

The following probate backlogs continue to exist:

- Probate case processing backlogs (outside contractor)
- Summary distribution backlogs (ADMs)
- *Youpee* redistributions (outside contractor)

- BIA Posting and Recordation backlogs (LTRO, Realty, and an outside contactor)
- OHA docketed cases via Administrative Law Judges (ALJs)

Significant probate case processing backlogs continue to plague BIA due to the lack of a nationwide rollout. Of the original 5,400 backlogged probate cases identified, only a small fraction have been eliminated. BIA, in accordance with OST direction and funding, continues to evaluate its case processing backlog elimination pilot study at the Pima, Papago and San Carlos Agency Offices in BIA's Western Region.

The BIA Deputy Commissioner directed that summary distribution backlog elimination receive the highest priority. Therefore, BIA and OHA collaboratively engineered regulatory changes to existing adjudicatory authorities, thereby permitting BIA employment of ADMs to adjudicate summary distribution probates of less than $5000. ADMs, and their staffs, continue to successfully resolve the significant number of backlogged summary distribution probates.

The OST-funded and BIA-executed *Youpee* redistribution pilot study at the Pawnee Agency and Southern Plains LTRO consumed 15 months of Trust reform time from study commencement until pilot reporting and initiation of subsequent backlog elimination was expanded. Despite the protracted pilot study and reporting process, the subsequent *Youpee* redistribution effort was limited to BIA's Southwest Region instead of incorporating a national redistribution rollout and has resulted in the elimination of very few backlogs to date.

While LTRO posting and recording efforts appear to be progressing within the three pilot offices, LTRO posting and recordation is a complex issue requiring dedicated time and effort to master. Consequently, significant LTRO staff personnel time and energy has been required to ensure the proper and accurate posting and recordation certification of the volume of backlogged probate cases being resolved by contracted services. Because LTROs have reportedly reallocated their leading title examiners to certify contracted posting and recordation efforts, the resultant absence of adequate staffing within the LTRO to timely process its volume of current posting and recordation has permitted some current processing to slip into a backlogged status. However, on a positive note, LTRO posting and recordation backlog elimination has reportedly been expanded to include BIA's three remaining LTROs.

OHA docketed, yet backlogged, probate cases have received considerable attention. OHA sought and received funding to hire ten additional ALJs to assist with the elimination of the OHA probate backlog. However, unable to identify sufficient ALJs, OHA sought and obtained permission to hire ten Indian Probate Judges to perform Indian probate adjudications. Additionally, OHA reopened four of its previously closed field offices. Hiring only five of its authorized ten Indian Probate Judges to join its existing cadre of ALJ's, OHA has successfully adjudicated and eliminated a significant portion of its backlogged probate cases. Further, OHA forecasts that its entire probate backlog will have been adjudicated and eliminated by the end of FY2002.

Finally, a conflicting standard has been adopted regarding BIA's definition of *probate backlog*. The HLIP has defined a BIA *probate backlog* to mean any probate not forwarded to OHA or ADMs for adjudication within 90-days of receipt of the official death notice. During the statutory authority collaborative revision effort between OHA and BIA, BIA reported that language was inserted modifying and extending BIA's definition of *probate backlog* from 90-days to 120-days following official death notice. However, the modified *probate backlog* language failed to be published in the Code of Federal Regulations and officially does not exist.

Detailed Recommendations

2.1.1. Use contracted services to secure a nationwide elimination of the probate case processing backlogs

Establish a firm deadline by which an outside contractor is to have processed and eliminated the nationwide backlog of probate case processing. Provide the outside contractor with sufficient funding to comply with the established probate case processing backlog elimination deadline. Build financial performance incentive and punitive standards into the negotiated contract.

2.1.2 Establish a firm date for ADM elimination of all summary distribution backlogs

Establish a firm deadline by which ADMs are to have processed and eliminated the backlog of summary distribution estates requiring heirship determination and cash distribution. Provide adequate funding to ensure ADMs can comply with the established summary distribution backlog elimination deadline.

2.1.3 Expand the resolution efforts of all Youpee redistribution issues

Specific recommendations related to *Youpee* case resolution and redistribution are addressed in Detailed Recommendation 2.2.2 and Recommendation 2.3 below.

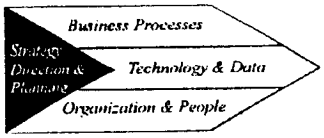
2.1.4 Expand contracted services to promptly eliminate LTRO posting and recordation backlogs

Establish a firm deadline by which the outside contractor is to have processed and eliminated the existing backlog of LTRO postings and recordation. Provide the outside contractor with sufficient funding to comply with the established LTRO posting and recordation backlog elimination deadline. Build financial performance incentive and punitive standards into a modified contract with the outside contactor. Ensure the LTRO posting and recordation backlog elimination definition includes all posting and recordation efforts created by all backlog sources (e.g., existing LTRO backlog, probate processing backlog, *Youpee* redistribution backlog, OHA adjudication backlog, etc.).

2.1.5 Carefully monitor the influx of probate cases requiring OHA adjudication

OHA should continue to use its ALJs and five Indian Probate Judges to adjudicate its current backlog of probate cases. Careful consideration and advance planning should be employed as to whether hiring the five additional funded Indian Probate Judges is warranted. However, once OHA eliminates its existing cache of backlogged probate cases, OHA and BIA should liaise to ensure OHA is adequately staffed to adjudicate the influx of probate backlog elimination cases to be forwarded to OHA for adjudication. If the influx rate of probate cases into OHA significantly increases, OHA should hire and train the five remaining Indian Probate Judges, funded under existing directives, so as to preclude additional probate backlogs.

2.2 Reorder Backlog Resolution Priorities



The HLIP separately identifies specific tasks to be either jointly or individually addressed by BIA and/or OHA. While separate and identifiable tasks address probate backlog resolution actions, an ordered, timely, prioritized and rational approach to probate backlog elimination is necessary to ensure the prompt resolution of all probate backlogs.

Observations and Findings

The preferred approach of OST to resolving the variety of probate backlog issues appears to have been the initiation of pilot studies designed to assess both cost and manpower issues associated with a given probate backlog elimination effort. However, the wide variety of probate backlog elimination pilot studies and their subsequent analysis and reporting, while rational and prudent, have served to significantly delay the timely address of the probate backlog issue across all lines and regions. The overall delay in probate backlog elimination precipitated by prolonged pilot study conduct, analysis and reporting, coupled with the reported fact that no OST-initiated study has resulted in abandonment, or significant alteration, of an established probate backlog elimination protocol, overshadows the advantages underlying pilot study conduct.

Detailed Recommendations

2.2.1 Limit the quantity and duration of pilot programs

If a pilot program is initiated, establish narrow scope, extremely short duration, and defined termination date. Quickly expand successful pilot programs into fully funded and staffed nationwide programs that are performance-based and a fixed completion date.

2.2.2 Focus immediate and urgent attention on resolving/redistributing Youpee interests

Immediately initiate a nationwide performance-based, fixed completion date contract effort to identify, redistribute, record and disburse applicable funds associated with all escheated *Youpee* interests. Additional recommendations related to *Youpee* case resolution and redistribution are addressed in Recommendation 2.3 below.

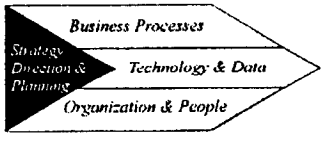
2.2.3 Establish a nationwide near-term probate case processing backlog elimination deadline

Renegotiate the existing probate case processing backlog contract. Expand the probate case processing elimination effort into a simultaneous, nationwide, performance-based, fixed completion date contract effort.

2.2.4 Negotiate a firm deadline for complete LTRO posting and recordation backlog elimination

Establish a firm deadline by which the existing contractor is to have processed and eliminated the complete backlog of existing LTRO postings and recordations created by all other backlog sources (e.g., existing LTRO backlog, regular probate backlogs, *Youpee* backlogs, etc.). Ensure that the contractor is provided sufficient funding for the proper allocation of personnel necessary to achieve the newly established firm deadline.

2.3 Resolve All Youpee Interests



The 1983 Indian Land Consolidation Act (ILCA) provided that upon the death and subsequent probate of an Indian Trust resource owner's estate, any fractionated ownership interest of two percent or less residing in the decedent's estate would escheat (transfer) to the tribe having jurisdiction over the land or resource. In 1997, the U.S. Supreme Court, in *Babbit v. Youpee,* found the ILCA escheat provision to be unconstitutional. Accordingly, BIA was ordered to redistribute all Indian interests previously and incorrectly distributed to tribes via the ILCA escheat provision. Despite

a 1999 DOI Secretary order for BIA to redistribute *Youpee* interests, significant numbers of Indian ownership interests have yet to be redistributed, posted and recorded.

Observations and Findings

BIA was tasked with selecting a BIA regional office to conduct a pilot project to identify the scope and cost of the efforts required to determine and redistribute pilot region escheated interests by June 2000. BIA was also tasked with analyzing the *Youpee* pilot study and determining the methodology for processing remaining cases by September 2000. Finally, BIA was tasked with resolving and redistributing all *Youpee* interests by September 2004.

A significant number of escheated interests have yet to be redistributed to the estates of decedents and subsequently, to their proper heirs, in accordance with the 1997 *Babbitt v. Youpee* decision. An OST-sponsored time and budget pilot study was initiated at the Pawnee Agency and Southern Plains LTRO in May 2000. However, the actual distribution of funds to the affected parties was not accomplished until October 2000, a final report on the OST time and budget pilot study was not submitted until May 2001, and any sort of larger rollout was not accomplished until October 2001. Consequently, a full 16 months transpired between pilot study initiation and expanded *Youpee* redistribution backlog elimination efforts. Further, the *Youpee* redistribution backlog elimination efforts were subsequently expanded, but they were limited to BIA's Southwest Region instead of instituting a nationwide redistribution backlog elimination effort. An exceedingly small percentage of the identified 178,000 restricted and Trust interests impacting 13,000 estates have reportedly been redistributed to date. Finally, there does not appear to be an organizational commitment to the full resolution and/or redistribution of *Youpee* interests by a fixed date.

Detailed Recommendations

2.3.1 Formalize an organizational commitment to prompt nationwide Youpee redistribution

Establish and formalize an unflagging organizational commitment to fully resolve and/or redistribute all *Youpee* interests. Fully fund and immediately expand *Youpee* redistribution backlog elimination efforts beyond the Southwest Region into all 12 BIA regions.

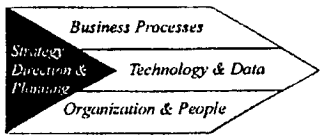
2.3.2 Establish a firm Youpee redistribution completion deadline

Establish a firm deadline by which the outside contractor is to have processed and eliminated the nationwide backlog of *Youpee* redistributions. Redistribution efforts should include not only title posting and recordation, but Office of Trust Funds Management (OTFM) redistribution as well. Provide the outside contractor with sufficient funding to comply with the established *Youpee* redistribution backlog elimination deadline. Build financial performance incentive and punitive standards into the modified contract with the outside contractor.

2.3.3 Evaluate the feasibility of an arbitrated or mediated Youpee settlement

Alternatively, and perhaps more appropriately, OST and BIA should evaluate the feasibility of either an arbitrated or mediated settlement with the reported 13,000 interested parties impacted by the 1997 *Babbitt v. Youpee* decision. OST should then petition Congress for supplemental funding sufficient to facilitate complete settlement and resolution of the *Youpee* issue.

2.4 Achieve Proper Probate Case Processing Staffing Levels



Achieving and maintaining appropriate probate case processing staffing levels is essential to the proper and timely execution of probate fiduciary duty owed to Indian beneficiaries. The HLIP required BIA and OHA to conduct a number of personnel and staffing assessments and modifications specifically designed to address the probate backlog elimination needs of both DOI organizations. Further, the HLIP required that the administrative authority addressing each new position and its associated responsibility be drafted, published and disseminated.

Observations and Findings

In accordance with HLIP tasking, BIA and OHA conducted staffing assessments. Subsequently, a significant number of new probate processing personnel (e.g., Attorney Decision Makers, Indian Probate Judges, Probate Specialists and Probate Clerks) were hired, placed and trained. Additionally, several OHA Field Offices were reopened. OHA staffing increases and probate backlog elimination efforts appear to be achieving desired success based on the current influx of BIA-forwarded probate cases. However, BIA is forwarding OHA significantly fewer probate backlog elimination cases than are necessary to eliminate BIA probate backlog in a manner consistent with HLIP tasking requirements. Further, and of more immediate importance, despite BIA Staffing Needs Assessment completion and deployment of 74 new probate personnel (Specialists/Clerks), significant discrepancies continue to exist between staffing needs and staffing levels at most BIA Agency and Regional Offices. The BIA Probate Specialist and Probate Clerk staffing deficiencies are directly contributing to the continued inability of current BIA staff to ensure new probate cases are not allowed to slip into a backlog status and further exacerbate probate backlog resolution efforts.

Detailed Recommendations

2.4.1 Reevaluate Agency Office Probate Specialist and Probate Clerk staffing levels

Ensure each Agency Office employs, at an absolute minimum, one fully funded Probate Clerk. Further, larger Agency Offices should employ, at an absolute minimum, one Probate Clerk and one Probate Specialist. Additionally, Agency Probate Specialists and Probate Clerks should not be assigned any collateral duty that could precipitate probate case processing to slip into backlog status.

2.4.2 Increase Agency Office Probate Specialist and Probate Clerk staffing levels

Regional Offices should employ, at an absolute minimum, one Probate Specialist. Regional Office Probate Specialists should be sufficiently trained and adept in probate task performance so as to serve as the regional point person/expert for probate processing issues and answers. Further, Regional Probate Specialists should not be assigned any collateral duty that could potentially precipitate probate case processing to slip into backlog status.

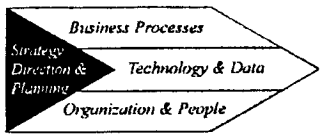
2.4.3 Increase Contract and Compact Tribe Probate Clerk staffing levels

Contract and Compact Tribes should employ, at an absolute minimum, one fully funded Probate Clerk. Probate Clerks should not be assigned any collateral duty that could potentially precipitate probate case processing to slip into backlog status.

2.4.4 Design and deliver annual probate personnel training tailored to probate staff needs

Provide ongoing Probate Clerk and Probate Specialist annual training. Probate staff training should consist of focused and practical application of everyday probate issues and be delivered through the School of Trust Management. (See HLIP 10: Training, Detailed Recommendation 2.1.2) Probate Clerks and Specialists should be able to submit questions and scenarios to be addressed during training that are of greatest concern and assistance to them in performing their probate duties.

2.5 Accurately Assess and Define LTRO Staffing Needs



LTRO personnel are responsible for the efficient and timely posting and recordation of ownership interest changes impacting Indian beneficiaries. Additionally, due to the highly sensitive nature of ownership interest posting and recordation, maintaining staffing levels in a manner sufficient to ensure the prompt and accurate posting and recordation of Indian beneficiary ownership interests is a direct and important fiduciary duty of the Secretary.

Observations and Findings

The LTROs are presently handling only current recordation requirements. BIA has initiated backlog posting and recordation elimination contracts with an outside contractor. LTRO personnel are contractually required to perform quality-assurance checks of contractor work prior to certifying the accuracy and validity of the ownership interests to be posted and recorded. However, leading LTRO title examination personnel have necessarily expended significant time performing certification reviews of completed contractor work product. As a result of using leading LTRO title examination personnel to perform certification checks on contracted backlog elimination work, the LTROs have experienced an increase in the number of current posting and recordation requirements slipping into backlog status.

Detailed Recommendations

2.5.1 Hire sufficient LTRO personnel to keep pace with posting and recordation requirements

Perform an assessment of LTRO staffing needs necessary to sustain post-backlog elimination posting and recordation. Hire sufficient LTRO personnel to keep pace with the influx of posting and recordation requirements caused by nationwide backlog elimination efforts. Permit hiring practices related to workload increase caused by backlog elimination, contractor reassignment and fractionation to anticipate the additional time necessary to locate, acclimate and train new LTRO personnel.

2.5.2 Create and administer a customized nationwide LTRO training program

Create a LTRO training program specifically designed to quickly and effectively train contractors performing LTRO backlog elimination duties. Ensure that leading LTRO personnel both administer the training program and perform certification functions necessary to confirm the validity of contracted posting and recordation work. Further, assign a dedicated LTRO staff member within each title plant to administer remedial training as required, assist the contractor

with unique posting and recordation issues, and ensure existing LTRO staff focus exclusively on the posting and recordation of current beneficiary ownership interest changes.

2.6 Outsource Legal and Financial Service Offerings

The rendering of legal services by individuals not appropriately trained in the intricacies of individual state law place both those rendering legal advice and those receiving potentially incomplete or erroneous advice at considerable risk. The same principle applies to the delivery of financial services by individuals not appropriately trained in the financial area.

Observations and Findings

Existing BIA policy not only tolerates the rendering of legal and financial advice by its probate personnel, BIA actually requires its probate employees assist Indian beneficiaries with such matters. Probate Specialists and Probate Clerks are inappropriately rendering financial and legal advice regarding estate planning, will design and construction, and ILCA-related issues. Reportedly this has existed for many years. In fact, on-the-job training of probate personnel has routinely included exposure to typical financial and legal issues of the greatest interest to Indian beneficiaries. However, in an effort to enhance the legal proficiency of BIA probate personnel, the HLIP required BIA and OHA to jointly develop a Probate Paralegal Certification Program by August 2000. Unfortunately, the program remains only a work in progress. In fact, the only identifiable effort initiated in compliance with the HLIP program requirement is a generalized Civil Procedure mini-class tentatively scheduled for the Spring 2002.

Detailed Recommendations

2.6.1 Preclude probate personnel from rendering financial and legal advice to beneficiaries

Probate Clerks and Probate Specialists should be specifically precluded from offering estate planning advice and financial planning advice given their lack of formal estate planning and financial education. Additionally, Probate Clerks and Probate Specialists should be specifically precluded from rendering any sort of legal advice or participating in last will and testament construction given their lack of formal legal education. Permitting untrained and unlicensed personnel to render advice typically reserved to trained and licensed professionals potentially exposes individuals to unnecessary risk and liability.

2.6.2 Provide probate personnel with responses to frequently-asked questions

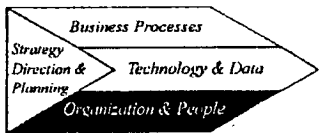
Probate Clerks and Probate Specialists should be provided with written official responses to frequently asked questions directly related to the newly proposed ILCA legislation. Probate personnel frequently find themselves being asked to provide beneficiaries answers to difficult questions requiring the probate personnel to interpret and render advice regarding ILCA matters. By creating and providing probate personnel written official responses to frequently asked ILCA questions, more accurate and consistent answers can be provided to Indian beneficiaries.

2.6.3 Provide beneficiaries with contracted financial and legal services

Hire regionally accessible law firms and financial planning firms to provide low-cost or subsidized legal services (e.g., Will preparation) and financial planning services to Indian

beneficiaries. Make referral service and appointment scheduling available from each agency and regional office. Additionally, provide beneficiaries with brochures and fliers detailing available financial and legal services. Finally, provide no-cost/subsidized basic will preparation kits for Indian beneficiary use.

2.7 Expand Delivery of Responsive Customer Service Outreach Vehicles



The provision of customer-oriented services, brochures, and literature serves not only to inform beneficiaries of available offerings and options, but fulfills an important fiduciary duty of providing services in the best interest of the beneficiary. Expanding the delivery of customer service outreach via courteous, respectful and plain language offerings directly and positively impacts the perception of trustee interest in the welfare of beneficiaries.

Observations and Findings

The HLIP required the BIA and OHA to design processes to accommodate three Indian customer service requests:

- Timely probate processing.
- Treat Indians with courtesy and respect.
- Write and speak in plain language when addressing Indian concerns.

Additionally, BIA and OHA were tasked with developing brochures and other materials addressing and describing the integrated probate system and process, offering informational activities throughout Indian communities regarding estate planning and other related topics, and designing web pages and handbooks for Indian access and use.

The 1999 DOI Indian Probate Reinvention Lab (IPRL) identified that beneficiaries voiced concerns claiming that probates were processed too slowly and inefficiently. Further, the IPRL identified that beneficiary questions were not answered promptly and clearly, nor were beneficiaries generally treated with respect. Uniformly, BIA probate interviewees expressed dismay when made aware of beneficiary concerns in the areas listed above. Interviewees expressed sincere belief that their delivery of services and courtesy extended toward beneficiaries was consistently efficient, polite and accommodating. However, aside from BIA web page and its associated links (several of which have not been recently updated), no concerted effort at transparent customer outreach was identified. In fact, BIA Customer Service web site selection is limited to a rather basic Customer Feedback e-mail link, a gratuitous Customer Service Excellence Award link, and a link for viewing a single summarized Customer Satisfaction Survey.

Detailed Recommendations

2.7.1 Increase communication with beneficiaries regarding probate backlog elimination

The single most important customer (beneficiary) outreach event, requiring immediate attention and potentially yielding the greatest near-term return on investment, is the prompt elimination of all probate backlogs. In the interim, consistent and informative plain language communications

charting probate backlog elimination progress throughout the Indian community can be accomplished. The generation and quarterly distribution of individual mailings, written tribal communications, and web-based postings would all satisfy fiduciary duty. Increased communication can be accomplished via redesigned and updated BIA web page. Additional probate backlog elimination information could be made available by placing increased focus and emphasis on interactive links and meaningful/useful web site content.

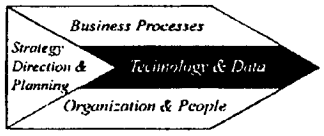
2.7.2 Provide probate personnel with Standard Operating Procedures

Create, publish, disseminate and enforce Standard Operating Procedures (SOP) within BIA Regional and Agency Offices, addressing typical and routine customer service issues. The SOPs should outline the proper means by which to resolve typical beneficiary problems. Additionally, SOPs can be customized to address both local and regional issues and situations.

2.7.3 Provide beneficiaries with plain language probate process and associated personal service explanations

Develop a recurring mechanism whereby BIA employees are reminded that all correspondence with beneficiaries is to be communicated in plain language and with the utmost respect. Create and disseminate plain language brochures clearly diagramming and communicating the newly streamlined probate process and the important impact proper beneficiary estate planning, including will creation, can have on maintaining probate processing efficiencies. Offer recurring, beneficiary-oriented educational programs with a focus on estate planning, will construction, and fractionation elimination. Develop beneficiary programs and marketing vehicles specifically designed to inspire and motivate the Indian community to create valid and descriptive personal wills.

2.8 Eliminate Redundant Computer Tracking Systems



A computer tracking system to monitor the progress of individual probate case processing and document beneficiary ownership interests can offer tremendous utility to system operators. Integration of computer systems operated by separate, but interrelated entities infuses significant positive efficiencies into a combined program. However, independently operating computer systems performing similar processes introduce significant inefficiencies into related programs.

Observations and Findings

The HLIP tasked BIA and OHA to coordinate efforts and conduct an equipment needs assessment focused on both hardware and software. Further, the HLIP tasked BIA and OHA with the coordinated development of a national database within TAAMS designed to track the progress of probate cases. The intent was for the new national probate database to assist BIA Agency Offices, BIA Regional Offices and OHA Offices with timely probate case processing. Consequently, BIA and OHA effectively expanded an existing OHA probate tracking system into a joint BIA/OHA probate tracking system known as the Probate Operating System (POS). The POS is capable of either standing alone or being integrated into TAAMS as a probate module.

The POS tracks probate case status and should be populated with current and accurate LTRO ownership tracking information. However, BIA Agency Offices continue to maintain varied and separate land ownership interest computer tracking systems in parallel with existing LTRO systems. This is due to the inability of LTRO to consistently prevent backlogs in probate posting

and recordation. Consequently, the obvious efficiencies offered by the BIA/OHA consolidated POS cannot be fully realized without first addressing the inefficiencies caused by the duplication of effort and information within both the LTRO and BIA Agency computing systems.

Detailed Recommendations

2.8.1 Actively promote the accuracy and timeliness of LTRO posting and recordation to Agency Offices

Establish a firm deadline by which the contractor is to have processed and eliminated the backlog of existing LTRO posting and recordation created by all other backlog sources (e.g., existing LTRO backlog, probate case processing backlogs, *Youpee* backlogs). Communicate LTRO backlog elimination progress to Agency Offices so as to promote a greater comfort level with LTRO records accuracy and reliability. Establish how Agency information storage and retrieval needs can be satisfied by existing LTRO computer systems.

2.8.2 Determine Agency-specific computer information storage and access needs

Query each Agency and identify specific rationale for maintaining separate land ownership computer tracking systems. Identify probate ownership interest recordation and tracking functions maintained by the various Agency computer systems. Afterward, ensure LTRO and POS computer systems and processes adequately provide the level of accuracy and completeness necessary to satisfy Agency needs.

2.9 Establish Joint Record Keeping Programs

Significant efficiencies and economies of scale can be achieved by coordinating and establishing joint record keeping programs between separate, but related entities. Joint record keeping efficiencies can be realized in production, utilization, and archiving costs.

Observations and Findings

The BIA and OHA were jointly tasked with coordinating the development of a national database within TAAMS to be utilized by BIA and OHA to track the progress of probate cases. Additionally, BIA and OHA were jointly tasked with coordinating and developing joint record keeping strategies in coordination with the HLIP Records Management Subproject. The Probate Implementation Team (BIA and OHA Subproject Managers) reported that their joint record keeping coordination was completed prior to creation of the HLIP. The HLIP requires BIA to publish probate file maintenance standards. However, no joint BIA/OHA record keeping coordination or strategy effort has been identified. Rather, both BIA and OST reported that the HLIP Records Subproject Manager was responsible for responding to the joint record keeping requirement. The OST's Office of Trust Records (OTR), via its Division of Records Management Services and Indian Affairs Records Management Group has published standards for record processing and archiving. However, the Probate Implementation Team did not express familiarity with the Indian Affairs Records Management standards. Rather, 54 BIA Manual (BIAM) Supplement 8, in accordance with 25 CFR 15.503(a)&(b), 43 CFR 4.236(b), and 16 BIAM, specifies that the repository for all original probate records assembled and processed by BIA and OHA shall be the LTRO originally responsible for posting and recording the decedent's ownership interests. While the original copy of each adjudication is forwarded to the responsible

BIA LTRO, one photocopy of each OHA adjudication is retained by OHA for its record, while an additional photocopy is forwarded to the initiating BIA Agency Office for it own record keeping efforts. Consequently, multiple copies of each adjudication are circulated, utilized, and archived, thereby introducing further inefficiencies into the probate system.

Detailed Recommendations

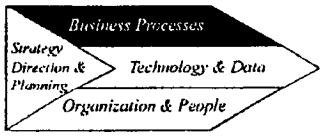
2.9.1 Develop an integrated joint record keeping program

Develop and implement joint BIA/OHA record keeping procedures consistent with Chapter 16 of BIA Manual that is capable of satisfying the needs of OHA, LTRO, and Agency end users. Establish a mechanism capable of precluding the need for multiple copies and interpretation of written adjudicatory opinion. Joint record keeping will serve to eliminate redundancy costs associated with production, utilization, and archival storage. More importantly, joint record keeping may serve to decrease the frequency and problems associated with inconsistent interpretation of written adjudicatory opinions.

2.9.2 Ensure compliance with established Records Management standards

Coordinate record keeping strategies with the Records Management Subproject manager to ensure the efficient collection, archiving, and subsequent retrieval of records consistent with established standards. Ensure that record retention and record archiving is accomplished in accordance with criteria established and disseminated by OST's Office of Trust Records, via its Division of Records Management Services and Indian Affairs Records Management Group.

2.10 Establish Continuous Process Improvement Liaisons



The coordinated sharing of information between separate, but related entities is vital to the efficient operation of an organization. Close adherence to appropriate privacy protections must be integrated into any information sharing process. However, continuous process improvement requires a recognition of the efficiencies to be gained by the sharing of information.

Observations and Findings

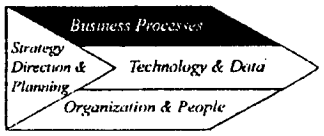
BIA and OHA were tasked with coordinating actions that will lead to strengthening relationships and agreements with state and local governments and the federal government. Additionally, BIA and OHA were tasked with creating a model Memorandum of Understanding (MOU) outlining the parameters of federal agency partnerships. Federal government agency interactions that surfaced most prevalently during interviews involved the DOI/BIA/OHA MOU establishing working relationships and cooperative exchanges of information with other federal agencies in an effort to facilitate the identification and location of potential beneficiaries of Indian Trust Assets. Presently, a copy of the MOU resides on BIA Probate web page. Further examples of BIA and OHA probate interaction with other federal agencies covered by the DOI/BIA/OHA MOU include the Social Security Administration (SSA), Internal Revenue Service (IRS), and other federal agencies as required to facilitate probate case processing. MOU are reportedly facilitated via the DOI Assistant Secretary.

Detailed Recommendations

2.10.1 Expand MOU relationships with other federal agencies

Identify and strengthen relationships with federal agencies directly involved and potentially helpful in the timely compilation and execution of BIA and OHA probate case processing activities (e.g., SSA, IRS, Vital Statistics, VA, Census Bureau). Liaise with other federal agencies capable of identifying and providing advice and assistance regarding successful methodologies for effective and accurate information retrieval. Establish MOU relationships with all federal entities capable of enhancing the delivery of fiduciary services to Indian beneficiaries.

2.11 Enhance Tribal Relationships and Communication



The timely, thorough and efficient two-way communication between related parties is of paramount importance to relationship enhancement. Further, the proper provision of fiduciary duty requires the responsive provision of communication between trustee and beneficiary. Consequently, a commitment to the meaningful exchange of information between related parties requires constant attention, coordination, and development.

Observations and Findings

The HLIP required the BIA and OHA to strengthen relationships and agreements with tribal governments as well as compiling an inventory of the Indian tribes that perform probate functions under PL 93-638 contracts and self-governance compacts. Further, BIA and OHA were tasked with compiling an inventory of current tribal inheritance codes (tribal rules governing the disposition of a deceased Indian's estate) and distributing the same throughout BIA/OHA regional structure, developing a model inheritance code, as well as publishing guidance on methods designed to enhance tribal outreach relationships. An inventory of Indian tribes performing probate functions under PL 93-638 contract and self-governance compact exists and is known to all BIA and OHA regions. It was reported that no individual tribal inheritance codes currently exist or are being used. Consequently, none of BIA or OHA regions have received an inventory of tribal inheritance codes. While a model inheritance code (a suggested series of rules governing the disposition of a deceased Indian's estate) has reportedly been drafted, there was no indication that BIA or OHA has established a dissemination date. Further, neither BIA or OHA has established any sort of coordinated roll-out, education, promotion, or incorporation of its draft model inheritance code. Finally, guidance on methods designed to enhance tribal outreach relationships is an ongoing process. Other than a reported increase in BIA-initiated tribal consultations, no tangible tribal outreach or relationship enhancement methodologies were identified.

Detailed Recommendations

2.11.1 Designate a BIA/OHA Tribal Communication Liaison Staff Position

Establish a Tribal Liaison position/staff whose sole purpose is to serve as a conduit through which the flow of information directly impacting the Indian beneficiary is facilitated. Ensure that the existing Consultation process is more widely used for the dissemination of information and receipt of recommendations regarding fiduciary actions of major importance to beneficiaries.

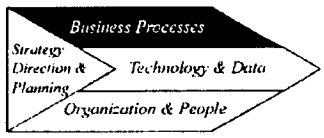
2.11.2 Actively promote adoption of a Model Inheritance Code

BIA and OHA should design and promote a Model Inheritance Code for widespread use among the Indian Tribes. Significant efforts should be initiated to encourage the adoption and customization of the Model Inheritance Code, as required, to accommodate individual tribal preferences and concerns. As individual tribes take action, disseminate adopted Tribal Inheritance Codes among other tribes wishing to design or adopt their own Inheritance Codes.

2.11.3 Promote the use of Last Will and Testament

Actively promote Indian acceptance, creation and use of Last Will and Testament documents to identify and ensure the proper completion of a deceased Indian's wishes regarding the disposition of personal assets. Provide ongoing interactive training, consistent with the fiduciary duty owed to Indian beneficiaries, regarding the importance of identifying the manner in which an estate will be distributed following death. Promote the added benefit of reducing the degree of ownership interest fractionation that typically results from not drafting and executing a Last Will and Testament.

2.12 Reduce The Time Required For Probate Case Processing



The Secretary of the DOI is tasked with determining the disposition of Trust assets following the death of an Indian beneficiary. Therefore, the proper execution of fiduciary duty requires the prompt completion of probate case processing and subsequent distribution estate assets in accordance with the adjudicatory process.

Observations and Findings

While the HLIP does not specifically task BIA or OHA with addressing time efficiencies related to probate case processing, several time efficiency enhancement issues were identified via BIA and OHA interviews. Consistent definitional parameters related to backlog and backlog reporting were identified. Additionally, time and effort expended constructing probate case processing files was identified as an issue.

A disproportionate amount of probate processing staff workload consists of requesting and pursuing family-provided documentation (e.g., death certificates, marriage certificates, divorce decrees, adoption documentation). Probate personnel reported significant time delays in probate case processing construction and forwarding due to difficulties in obtaining required documentation and confirming/certifying information required by the OHA-7.

Detailed Recommendations

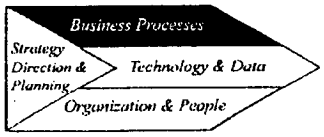
2.12.1 Reduce the document production burden on decedent families

Establish methodologies designed to minimize the production burden placed on a decedent's family during probate package compilation. Create and fund a financial account against which Probate Clerks and Probate Specialists can charge miscellaneous administrative fees associated with obtaining vital statistics critical to probate package processing. Adopt BIA/OHA procedures designed to address acceptable means of obtaining appropriate certifying documentation through MOU agreements with relevant state, local and federal agencies.

2.12.2 Designate a BIA/OHA Probate Operating System Manager staff position

Expand the use of the POS into a management tool for identifying inefficiencies and delays in timely probate case processing. Designate a single point of contact for monitoring the POS, inquiring when individual probate case delays are identified, assisting in the prompt resolution of processing issues, and prevention of probate backlogs at all levels.

2.13 Build on Successful Programs



Focusing on initiatives and efforts that serve to fulfill the fiduciary duty owed to Indian beneficiaries is an important factor in providing and maintaining overall program success. Identifying and expanding on program successes serves only to enhance the delivery of services throughout BIA and OHA.

Observations and Findings

OHA was tasked by the HLIP with hiring up to ten temporary Indian Probate Judges to conduct hearings and decide Indian probate cases on the current OHA docket as well as new probate cases forwarded to OHA by BIA. Additionally, BIA was tasked by the HLIP with hiring up to ten ADMs and associated support staff to adjudicate summary distribution probate actions of less than $5000 value. Both OHA and BIA respectively hired the requisite number of Indian Probate Judges and ADMs necessary to accomplish the HLIP-intended goal of probate backlog elimination. To date, significant reductions in the quantity of backlogged OHA adjudications have been realized such that, given OHA's present adjudication resolution rate, OHA will reportedly exhaust its docket of Indian probates by the end of Fiscal Year 2002. Further, BIA ADMs have made significant strides toward eliminating the significant backlog of summary distributions residing within BIA. The timely strategic changes in personnel staffing within both of the DOI entities highlight the effectiveness and necessity for proper business process forecasting and modification to meet changing circumstances.

Detailed Recommendations

2.13.1 Define the appropriate time and methodology to value a decedent's estate

Clearly define the point at which a Probate Specialist or Probate Clerk is to determine the value of a decedent's estate. Additionally, define the methodology to be employed when establishing the value of a decedent's estate. Inconsistent points in time are being used to establish the value of a decedent's estate (e.g., upon receipt of death notice, upon probate package (OHA-7) completion, upon actual BIA or OHA adjudication). Establishing a standardized point in time and methodology serves to more precisely assist probate personnel in determining whether a completed probate package is to be forwarded to OHA or to an ADM for adjudication.

2.13.2 Define and standardize the definition of Probate Backlog

Clearly define, publish and disseminate whether a BIA probate backlog is considered to be 90-days or 120-days beyond receipt of the death notice. Additionally, clearly define, publish and disseminate the definition an OHA adjudication backlog. Considerable confusion, inconsistency and invalidity of probate backlog elimination efforts are introduced when separate elements of BIA report probate backlog elimination successes based on differing probate backlog definitions.

2.13.3 Eliminate redundant probate adjudicatory authority

Eliminate the authority of Agency Superintendents to perform summary distributions, reserving exclusive authority for summary distributions to the ADMs.

2.13.4 Further define the authority of Attorney Decision Makers

Consider again increasing the summary distribution dollar authority of ADMs to a value greater than $5000 so as to further unburden OHA. Additionally, clearly define, publish and disseminate the authority limitations of an ADM to conduct probate hearings by defining the parameters of a properly authorized ADM hearing.

2.13.5 Enforce Continuing Legal Education requirements

In accordance with HLIP tasking, require ALJs, ADMs, and BIA Probate Specialists to annually obtain five hours of continuing legal education (CLE) addressing the areas of estates administration and probate law.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
C. 2.1 Promptly Eliminate Probate Backlogs	@	@	• Facilitates the proper execution of probate fiduciary duty • Enhances the ability to promptly and properly process all probate cases • Enables the timely redistribution of decedent estates following adjudication • Eliminates a primary factor precipitating probate backlogs • Ensures prudent fiduciary management
C.2.1.1 Use contracted services to secure a nationwide elimination of the probate case processing backlogs	24		
C.2.1.2 Establish a firm date for ADM elimination of all summary distribution backlogs	12		
C.2.1.3 Expand the resolution efforts of all *Youpee* redistribution issues	21		
C.2.1.4 Expand contracted services to promptly eliminate LTRO posting and recordation backlogs	24		
C.2.1.5 Carefully monitor the influx of probate cases requiring OHA adjudication	@	@	
C. 2.2 Reorder Backlog Resolution Priorities	24		• Limits the quantity and duration of pilot studies • Establishes a firm and defined backlog elimination deadline • Facilitates the prompt, efficient and effective elimination of probate backlogs • Promptly redistributes improperly escheated ownership interests
C.2.2.1 Limit the quantity and duration of pilot programs	24		
C.2.2.2 Focus immediate and urgent attention on resolving/redistributing *Youpee* interests	24		
C.2.2.3 Establish a nationwide near-term probate case processing backlog elimination deadline	< 3		
C.2.2.4 Negotiate a firm deadline for complete LTRO posting and recordation backlog elimination	< 3		
C. 2.3 Resolve All *Youpee* Interests	6		• Complies with the Secretary's 1999 redistribution order • Immediate resolution, posting and recordation engenders beneficiary confidence in DOI/BIA fiduciary responsibility
C.2.3.1 Formalize an organizational commitment to prompt nationwide *Youpee* redistribution	< 3		
C.2.3.2 Establish a firm *Youpee* redistribution completion deadline	< 3		
C.2.3.3 Evaluate the feasibility of an arbitrated or mediated *Youpee* settlement	3		

Recommendation	Duration (mos)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
C. 2.4 Achieve Proper Probate Case Processing Staffing Levels	@	@	• Appropriate and timely probate case processing • Precludes probate case processing backlog • Prudent execution of fiduciary duty
C.2.4.1 Reevaluate Agency Office Probate Specialist and Probate Clerk staffing levels	< 3		
C.2.4.2 Increase Agency Office Probate Specialist and Probate Clerk staffing levels	6		
C.2.4.3 Increase Contract and Compact Tribe Probate Clerk staffing levels	6		
C.2.4.4 Design and deliver annual probate personnel training tailored to probate staff needs	@	@	
C. 2.5 Accurately Assess and Define LTRO Staffing Needs	@	@	• Enhances the fiduciary goal of ensuring the absence of probate posting and recordation backlogs
C.2.5.1 Hire sufficient LTRO personnel to keep pace with posting and recordation requirements	6		
C.2.5.2 Create and administer a customized nationwide LTRO training program	@	@	
C. 2.6 Outsource Legal and Financial Service Offerings	@	@	• Reduces the liability risk associated with the delivery of untrained and potentially inappropriate advice • Directly enhances the prudent delivery of fiduciary services
C.2.6.1 Preclude probate personnel from rendering financial and legal advice to beneficiaries	< 3		
C.2.6.2 Provide probate personnel with responses to frequently asked questions	3		
C.2.6.3 Provide beneficiaries with contracted financial and legal services	@	@	
C. 2.7 Expand Delivery of Responsive Customer Service Outreach Vehicles	@	@	• Increased communication engenders confidence in the delivery of fiduciary services • Consistent responses to frequently-asked questions promotes uniformity of results • Plain language efforts yield clarity and increased beneficiary receptivity
C.2.7.1 Increase communication with beneficiaries regarding probate backlog elimination	@	@	
C.2.7.2 Provide probate personnel with Standard Operating Procedures	3		
C.2.7.3 Provide beneficiaries with plain language probate process and associated personal service explanations	@	@	
C. 2.8 Eliminate Redundant Computer Tracking Systems	12		• Reduces Indian ownership recordation inconsistencies and inaccuracies at both the LTRO and Agency level
C.2.8.1 Actively promote the accuracy and timeliness of LTRO posting and recordation to Agency Offices	12		
C.2.8.2 Determine Agency-specific computer information storage and access needs	3		

Recommendation	Duration (mos)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
C. 2.9 Establish Joint Record Keeping Programs	12		• Directly enhances beneficiary confidence in trustee management of Indian trust accounts
C.2.9.1 Develop an integrated joint record keeping program	12		
B.C.9.2 Ensure compliance with established Records Management standards	6		
C. 2.10 Establish Continuous Process Improvement Liaisons	@	@	• Permits the adoption/integration of programs with a demonstrated track record of success
C.2.10.1 Expand MOU relationships with other federal agencies	@	@	
C. 2.11 Enhance Tribal Relationships and Communication	24		• Proactively communicating with beneficiaries is an essential aspect of the prudent exercise of fiduciary duty • Consistent, meaningful and plain language communication serves to preclude mistrust and lack of confidence
C.2.11.1 Designate a BIA/OHA Tribal Communication Liaison staff position	< 3		
C.2.11.2 Actively promote adoption of a Model Inheritance Code	18		
C.2.11.3 Promote the use of Last Will and Testament	18		
C. 2.12 Reduce The Time Required For Probate Case Processing	9		• Timely processing of probate case processing, adjudication and subsequent posting and recordation further exemplifies the execution of prudent fiduciary duty
C.2.12.1 Reduce the document production burden on decendent families	9		
C.2.12.2 Designate a BIA/OHA Probate Operating System Manager staff position	6		
C. 2.13 Build on Successful Programs	@	@	• Routinely clarifying the finer points of proper probate case processing and adjudication serve to define a consistent standard upon which Indian beneficiaries can depend
C.2.13.1 Define the appropriate time and methodology to value a decedent's estate	< 3		
C.2.13.2 Define and standardize the definition of Probate Backlog	< 3		
C.2.13.3 Eliminate redundant probate adjudicatory authority	9		
C.2.13.4 Further define the authority of Attorney Decision Makers	6		
C.2.13.5 Enforce Continuing Legal Education requirements	@	@	

@ - Indicates ongoing efforts

D. HLIP 4: BIA Appraisals

1. Overview

1.1 Description

The Appraisal Program performs an essential role for BIA as it handles its Trust responsibilities. The Appraisal Program provides impartial assessments of fair market value on Trust and restricted lands for tribal and individual Indian owner interests. These appraisals are then used for processing Trust resource transactions to ensure that Indian or Tribal interest owners receive fair and just compensation in these transactions.

Each of the twelve BIA regional offices has a group of appraisers that is responsible for conducting these appraisals and valuations. Regional appraisal groups are normally led by a Chief Appraiser who has a staff of appraisers to handle appraisal requests from individual Indian interest owners, tribal representatives or the regional office itself. The regional appraisal group reports either to the head of the regional office's Realty Branch or to the Regional Director's office. The majority of the regional offices have their appraisal group report to the Regional Director's office.

The mission of the Appraisal Program Subproject is "to ensure the compliance with universal appraisal processes and appraisal management standards that promotes the integrity of the appraisal process. Ensure the timely completion of appraisal services while maintaining the professional quality of valuation services."

Through the implementation of the various subproject tasks, BIA expects to achieve the following objectives:

- Eliminate backlog of appraisals.
- Develop an appraisal tracking and monitoring system.
- Develop bureau-wide valuation practices that are in accordance with Uniform Standards of Professional Appraisal Practice (USPAP). (The Appraisal Standards Board develops, publishes, interprets and amends the Uniform Standards of Professional Appraisal Practice on behalf of professional appraisers and users of appraisal services. These standards are recognized as the generally accepted standards of appraisal practice.)
- Revise and update Trust program manuals that outline appraising options and administrative procedures to ensure accurate and timely appraisals.

1.2 Current State

The Appraisal Program Subproject had 12 specific tasks identified for completion in the FY 2000 HLIP. There were significant efforts by the subproject manager and regional appraisal staff to address and fulfill the requirements of the various tasks and there are concrete results and activities as a result of these efforts. However, BIA's Appraisal Program: still experiences a backlog of appraisal requests (current estimate is 1,500); does not appear to have firmly established bureau-wide standards for valuation practices; lacks a bureau-wide automated

appraisal tracking and monitoring system and; has not realigned line authority over appraisers to address "conflict of interest" issues.

One task is listed as ongoing, and eight subproject tasks are listed as completed as of July 31, 2001 the DOI report to the court[1]. The tasks that have been given a status of "completed" essentially describes them as achieving their milestones even though ongoing activity occurs, and will continue due to the nature of the task requirements. This applies to tasks such as the certification of new and current appraisers and the periodic updating of the Real Estate Services Appraisal Handbook.

Additionally, describing some of the tasks as completed raises questions as to the true meaning of "completed" and whether it is the best way to monitor the implementation of tasks. The issue is that necessary activities were performed to "check off the box" for a task, yet questions arise whether concrete, permanent changes were incorporated into its business operations. As an example, the task to develop a real Estate Appraisal Handbook is shown as completed. Upon review, the Handbook, was last updated on October 1998, has had infrequent updated material added and is not viewed as a primary resource by its key audience, BIA regional appraisers.. Another example is the task to evaluate appraisal requirements to identify and recommend appropriate valuation methods for various realty transactions. The BIA Chief Appraiser, the Appraisal Technical Board (ATB) and other BIA employees worked diligently to review and revise regulations and internal guidance to identify appropriate and consistent valuation methods, but it is not evident that the regional appraisers are fully conforming to this guidance and using the recommended methods when required.

For the three incomplete tasks, various activities are underway or being initiated to address the open issues. Regarding the appraisal tracking system, BIA's Chief Appraiser initiated with DOI's Office of Information Resource Management (OIRM) the design and development of an interim tracking system. The system has a planned deployment of December 2001 and will be a stop gap measure to address security issues and support the management of appraisal workloads between regions until the TAAMS Appraisal module is activated.

With regard to the comparable sale/lease system BIA's Chief Appraiser is evaluating the procurement of such a system from a commercial source. Originally it was anticipated that this task would be handled within the TAAMS Appraisal module but this has been given a low priority.

For the third open task - realignment of appraisal line authority - there have been activities from various quarters to propose solutions or action plans but until recently none of these plans were approved or accepted by BIA's central office, regional office management or the Special Trustee. Documents and information obtained are conflicting in descriptions of proposed realignment plans and the timing of their proposal.

The most reasonable sequence seems to start with the *Fifth Quarterly Report* reporting a decision that was made to realign BIA Appraisal Program to establish a Division of Appraisals under the Director, Office of Trust Responsibilities in the Central Office. Also, in February 2001, the BIA Chief Appraiser and the Director of Trust Responsibilities presented to OST a plan to realign the current regional office appraisal group structure and create four "Super Regions" of appraisal

[1] Quarterly Status Report to the Court Number Seven, August 31, 2001.

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management offices that would each have a Chief Appraiser. The appraisal staffs in each "Super Region" would report to the "Super Region" Chief Appraiser. Each of the "Super Region" Chief Appraisers would report to the BIA Chief Appraiser.

According to the *Quarterly Status Report to the Court Number Seven,* in March 2001 BIA presented a proposal to have all appraisal staff report to BIA's Chief Appraiser. Subsequent to that action, in August 2001, BIA proposed a plan to separate the regional offices' realty and appraisal staffs and have the appraisal staff report to the Regional Director or Agency Supervisor.

At this point, a year and a half after the original milestone completion date of May 2000, no formal realignment plans have been implemented. None of the realignment plans described above were formally accepted. A Special Trustee memo on August 15, 2001 rejected the last BIA plan. In a recent meeting of regional appraisers sponsored by BIA's Chief Appraiser, the "Super Region" plan was not endorsed and a plan to have the regional appraisal groups report to the BIA Chief Appraiser received tentative support.

Most recently, the Assistant Secretary, Indian Affairs proposed to the Special Trustee relocating BIA appraisal functions to OST. The Special Trustee accepted this proposal and the next step is preparing the necessary action documents, with DOI Solicitor's Office assistance, to implement this change.

1.3 Recommendation Summary

EDS recommends that DOI immediately review and develop a solution to the alignment of authority over appraisal groups in order to address the conflict of interest issue and ensure effective management and oversight of the appraisal group resources. As part of this review, BIA should consider the option of outsourcing appraisal services and evaluate the impact this would have on providing timely, reliable and cost effective appraisal services to their customers.

If appraisal services are retained within the organization, DOI must focus on the continued development and implementation of systems and processes that support the delivery of consistent, efficient and valid appraisal valuation services. This includes:

- Development and implementation of an appraisal tracking system.
- Improved process that focuses on the best property valuation method for a type of property rather than the preferred valuation method used by a region.
- Creation of performance metrics to gauge progress towards goals and determine adjustments to resource allocations.

Additionally, BIA must continue with and expand the development of standardized appraisal processes and procedures to support consistent and efficient appraisal valuations within and among the regions. These standardization efforts are key to the improvement of appraisal services to customers and ensuring the underlying validity of the appraisal work. At the same time, BIA must acknowledge the various unique aspects of certain regions and areas and ensure they are recognized in the revised and updated appraisal polices and procedures.

2. Analysis and Recommendations

2.1 Address the Potential Conflict of Interest Issue

For the majority of realty, real estate and Trust organizations, the standard practice for securing appraisal services is to hire an independent organization to perform these services. The realty, real estate or Trust organizations that have within their organization an appraisal function or unit have formal administrative policies and procedures (sometimes called Chinese walls) to ensure the separation of real estate functions and appraisal functions.

The USPAP asserts through its Ethics Rule that "to promote and preserve the public Trust inherent in professional appraisal practice, an appraiser must observe the highest professional ethics." Part of this ethics standard is a conduct code that states "An appraiser must perform assignments with impartiality, objectivity, and independence..." and "An appraiser must not accept an assignment that includes the reporting of predetermined opinions and conclusions." These are the critical components that ensure a valid, reliable performance of appraisal services and are brought into question when "conflict of interest" issues are raised.

The present alignment of Realty Branch/Regional Office line authority over the appraisers in the regions creates the perception of a conflict of interest, and the potential for an actual conflict. This "perception of conflict" condition for the Appraisal Group will influence the view outside organizations have with regard to the objectiveness and impartiality of appraiser opinions and valuations of Indian Trust land. The "perception of conflict" condition requires immediate attention through the appropriate realignment of line authority so the Appraisal Group can avoid the appearance of conflict of interest. Taking this action will result in moving attention and energy from responding to "perceptional" concerns, to focusing on immediate concrete work needs that can improve the quality and timeliness of appraisal services.

Observations and Findings

There is a clear schism between the views of the regional offices, the BIA Chief Appraiser, the Special Trustee and senior management of BIA regarding the existence of a conflict of interest for appraisal staff and any efforts to address this issue. The Regional Directors interviewed feel that there is no conflict of interest concern because the regional offices have no vested interest in the valuation of a particular individual Trust interest holder or tribal land interest.

The current line authority reporting in the regional offices is mixed – some appraisal staffs report to the regional directors office, some report to the agency Superintendent while others continue to report to the Chief of the regional office Realty Branch. Many of the regional offices "split" their appraisal groups fromthe Realty Branches (as originally proposed by BIA but not endorsed by OST) and have the appraisal groups report to the Regional Director's office. Reportedly seven of the 12 regions are now structured this way.

The access and availability to infrastructure and support is the main concern regarding the movement of appraisal staff from reporting to the regional office management staff, either the Realty Branch or the Regional Director's office.. The appraisal staff in the regional and agency offices have relationships with the various support and other staff – IT support, administrative support and the realty office – which could be adversely affected if the appraisal staff is separated out from the offices.

The realty branch and appraisal staff encountered provided a clear impression of cooperation and professional recognition of shared responsibilities and obligations to those individuals with Trust interests. They are aware of the potential for conflict of interest and assert that this issue is not a concern since they strictly adhere to USPAP standards. However, the concern of appraiser independence still looms large, even with the best intentions and personal guarantees of objectivity, under the present line authority structure and with management policies that allow appraisers to perform appraisal services for relatives.

The reappearance of appraisal backlogs in the Rocky Mountain region highlights another issue related to line authority. This is the issue of allocation of resources among the regions. The organizational line authority needs a mechanism that allows movement of resources to various regions that need temporary support to complete workloads.

Detailed Recommendations

2.1.1 Review and assess realignment strategies for appraisal program reporting lines of authority

Establish a working group to conduct an immediate review and assessment of realignment strategies for appraisal reporting lines of authority. The working group should include representatives from the regional chief appraisers, regional appraisers, regional offices, BIA Central Office, BIA Chief Appraiser, OST and outside Subject Matter Experts (SMEs) or experts from other appraisal organizations and their organizational alignments. The Appraisal Standards Board could also be a resource for identifying appropriate SMEs and experts in this area. It is essential that outside experience and ideas be brought into the working group to ensure that all realignment possibilities and issues such as, responsive oversight and consistent use of resources, are considered during the review and assessment process.

Additionally, part of the review should include BIA appraisal management policies that contain potential conflict of interest situations, such as allowing appraisal staff to perform appraisals for family members.

2.1.2 Review and assess outsourcing alternatives for all appraisal work to independent real estate appraisal firms

The outsourcing of certain non-core functions of an organization, as seen in both the public and private sectors, has proven to be an efficient and resource saving alternative to the organization continuing to perform these functions. Performing appraisals is not a core mission function of BIA. However, effectively managing and maintaining Indian Trust accounts is, thus BIA needs to identify the most efficient and effective way to support its core function. Specifically, BIA needs to determine whether it can meet its fiduciary responsibility for the Indian Trust funds and interests by continuing to perform appraisals or should it outsource this activity.

Based on a thorough assessment of the pros and cons of outsourcing alternatives, BIA management can select the most efficient and cost effective approach for its appraisal work needs. If BIA makes a decision to outsource appraisal services the implementation of the remaining recommendations below will need to be re-evaluated.

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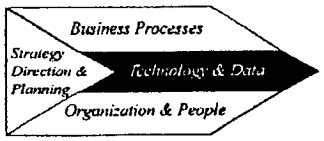
2.2 Continue to Develop Standardized Appraisal Tracking System



The HLIP task called for the implementation of a database to track appraisals that standardized the data fields, codes and parameters used between all the regions when logging in appraisal information. This appraisal logging system can assist in tracking and managing appraisal workload within and across regions. The tracking system can also be used to support a performance metric program at the regional offices.

Observations and Findings

Each region visited has developed a stand-alone appraisal tracking system. No bureau-wide standards were available to the regions when developing their systems. Regional appraisal staff selected the most convenient, cost effective and familiar platform for their tracking system.

The development of an appraisal tracking system as a part of TAAMS is delayed due to an ineffective and inconsistent requirements identification effort. The BIA Chief Appraiser is supporting the development of an interim tracking system to avoid further delays to improved status reporting on appraisals, increased use of standardized forms, and collection of performance metrics. Delays in deployment of a bureau-wide tracking system also delay efforts for data cleanup and the conversion process in anticipation of TAAMS Appraisal module implementation.

Detailed Recommendations

2.2.1 Continue to develop the interim tracking system through DOI's Office of Information Resource Management

The BIA Chief Appraiser should solicit and incorporate input from regional office Chief Appraisers and their staffs as requirements are developed and refined for the interim and final tracking system. (Note that selection and assessment of applications should be based on enterprise architecture considerations - see recommendations in the Breach #3 Computer and Business Systems Architecture Subproject section.) The interim system needs to emulate as closely as possible the final tracking system that will reside in the TAAMS system. This will help to simplify and streamline the final conversion to the Appraisal Module in the TAAMS system. If it is possible, accelerate the current development efforts for the system.

To facilitate an effective conversion to the final system, the interim tracking system development team must interact with the TAAMS development team to ensure that interfacing capability is available and that all requirements identified by regional and central office appraisal staffs are reviewed and incorporated as appropriate. Regular and substantive exchange of system development information regarding the interim and final tracking systems ensures compatible environments and consistent requirement definitions and incorporations.

2.2.2 Review and standardize/clean-up data for conversion to TAAMS Appraisal module

During development of interim tracking system, BIA must start the data review and standardization/clean up necessary for conversion to the TAAMS Appraisal module. This effort will remove any data inconsistencies and inaccuracies and will help to ensure the data in the interim and final tracking systems are valid and reliable. At the same time, BIA also needs to

identify and address any security concerns (e.g. data modification) that exist with the interim tracking system and any future tracking systems.

2.3 Determine the Need for Comparable Sales/Lease Database System

The BIA appraisers in each region need to refer to comparable sales or lease information for each appraisal they perform. Presently, the regions have their own independently developed, regional specific database and none of these regional databases interface with each other. Each of the regions has different sales/lease disclosure environments – some states are non-disclosure, some regional areas are largely rural with little automated information available – which has an impact on which type of automated database system is the most efficient and effective for that regional area. When BIA appraisers have an automated system that quickly provides sales/lease comparable information for real estate, the processing time of appraisals can be reduced.

Observations and Findings

Obtaining and using comparable sale and lease real estate information is one of the major requirements for conducting reliable and valid appraisals and valuations. To address this requirement, each of the visited regions independently developed or purchased their own local system for maintaining comparable sales and lease data. Each region appears to have unique needs and requirements for comparable sales/lease information and have independently developed ways to meet their needs. The regional solutions do not interface with other regions and it is uncertain what benefits are derived from having the systems interface. However, with the implementation of an enterprise business model (see the Breach 3: Computer and Business Systems Architecture Framework Plan Assessment section of this report) a review of potential benefits from an integrated systems interface can be completed.

Comparable values appear to be most closely associated with regional characteristics – agricultural land in the Great Plains, forested land in the Pacific Northwest, or mineral deposits in the Southern Plains. Some states are non-disclosure states, which means that sales and leasing information is not made publicly available. BIA regional appraisers operating in states with these restrictions cannot easily obtain the comparative information they need. When the appraiser does obtain comparative information, they develop a local "home grown" system to enter and maintain this information. Obtaining sales and lease comparable data in non-disclosure states requires developing "personal" networks of contacts and information sources. These networks can be very useful but as with any network operating through "personal' contacts there is an increased possibility of error and misinformation.

Several regional appraisers noted that nationwide comparable sales and lease system are not useful for the types of appraisal work that is conducted for Indian Trust interests. Much of the appraisal work is in rural and uninhabited (or low inhabitation) areas which does not support the creation of a database of sales/lease information.

Presently, the BIA Chief Appraiser is exploring the purchase of a COTS comparable sales/lease system.

Detailed Recommendations

2.3.1 Perform a needs analysis for a national comparable sales/lease system

Prior to purchasing and developing a national comparable sales/lease system, DOI needs to identify and confirm the regional need and usage of such a system . This needs analysis conforms with concepts contained in the Clinger-Cohen Act to identify and implement the most efficient business process, then determine the best and most appropriate way to automate that process. During the review process obtain outside expertise and consultation on the use of and alternatives to a nationwide comparable sales/lease system.

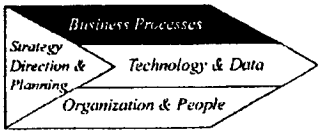
Based on information and results gathered, assess whether there is a need to reconsider the implementation of a nation-wide comparable sales/lease data system. Explore possible options such as "Super Region" based systems that can interface with the other "Super Region" systems as needed by the user.

The standardization of the comparable sales/lease system elements and requirements is an important and necessary focus. Even if the solution is not a national database system, the incorporation of standard data elements and requirements will support inter-region use and applicability. Regional appraisers, the BIA Chief Appraiser, members of the ATB and BIA Central Office staff must participate in the identification and collection of system elements and requirements for any comparable sales/lease system.

2.3.2 Investigate alternatives for comparable sales/lease information for unique regional needs

If a national database system is selected as the solution, it is recommended that BIA determine which regions will not fit easily into a national comparable sales/lease database system. For these regions, identify and investigate other possible solutions that can be used to provide comparable sales/lease information. The compatibility of these alternate solutions with the national comparable sales/lease data system must be considered during this solution identification phase. (Note that the selection and assessment of applications and systems should be based on enterprise architecture considerations - see recommendations in the Breach #3 Computer and Business Systems Architecture Subproject section.)

2.4 Establish a Performance Metrics Program



Standardized performance metrics are needed to gauge the timeliness, efficiency and effectiveness of appraisal work performed in the regions. Performance metrics provide information that can lead to appraisal process improvements and indicate areas where an individual appraiser or an appraisal group can improve performance.

Observations and Findings

In discussion with the BIA Chief Appraiser and regional office appraisers the only formal standard performance metric is the required 90-day turnaround for appraisal requests. Once an appraisal request is received by the regional office it has 90 days to complete the appraisal or it is considered part of the appraisal backlog inventory.

The regional offices visited did not have a standardized set of performance metrics used to gauge efficiency, productivity or resource needs. Each regional office independently assesses their appraisal sections performance using locally developed standards. The BIA Chief appraiser has no official capacity or involvement in developing or setting region-wide performance standards.

Regional office appraisal groups are interested in implementing a set of standardized performance metrics but are concerned that the metrics used will be indicative of the quality and applicability of the provided appraisal/valuation service. The prototype interim tracking database being developed is projected to collect three performance metrics: the type of appraisal; the time spent on the appraisal; and the elapsed time from appraisal request to completion. Reportedly, in the TAAMS Appraisal module there will be additional metrics incorporated, such as time spent on each component of the appraisal process (e.g. preparation for the appraisal, conducting the appraisal, review of the appraisal).

Detailed Recommendations

2.4.1 Develop and formalize a set of standard appraisal services performance metrics

In facilitated sessions, identify and formalize appropriate performance metrics for the appraisal program. Attendees in the sessions will comprise appraisal program representatives from agency offices, regional offices, the BIA Chief Appraiser and the Central Office. The outcomes from the sessions will be documented and submitted for approval to the appropriate management levels in DOI. Review the 90-day turnaround standard for appraisals to determine if that is the optimum period of days for that performance metric or could it be reduced.

The approved outcomes will be transmitted to the TAAMS appraisal subgroup responsible for developing the appraisal module for incorporation into the functional requirements addressing appraisal performance metrics. (Evaluate the inclusion of the appraisal performance metrics into a performance tracking capability developed for BIA to monitor its critical business operation areas. See Trust Enterprise Analysis and Recommendations Section IV 6.2)

Begin implementation of the performance metric program BIA-wide as soon as feasible. After a predetermined period (6 months to a year), evaluate the performance metrics program to adjust, add or remove performance metrics, as appropriate.

2.5 Eliminate Region-centric Approach to Selection of Appraisal Valuation Methods

Appraisal work is structured and managed with a region-centric approach. As a result, the BIA regions should explore alternatives to handling certain groupings or types of appraisal work. The regions could realize gains in efficiency and cost, if the focus on determining appraisal valuation methods was shifted from what valuation method does this region do best or is most familiar with, to what is the best method for this type of appraisal work.

Observations and Findings

In discussion with some of the regional appraisers the point was made that regions had certain unique characteristics that determined the predominate use of an appraisal valuation method or process. In the short time allowed for this study, EDS could not confirm or refute this assertion.

However, there was enough difference of opinion regarding this among the regional appraisers that the assertion can be called into question.

A "region-centric" view of how appraisals should be conducted can remove from consideration other valid methods of real estate valuation. Maintaining a region-centric view hinders the use of more efficient valuation methods in those regions that choose to consistently use one specific type of valuation method. The one appraisal valuation method consistently used in a region could be appropriate for a majority of the appraisal work done, but for certain types of property it may be either inefficient or inappropriate. There may be times when certain types of property or real estate needing appraisal work can be done in a more cost effective manner by other valuation methods.

This assessment of applying alternative appraisal valuation methods could have a positive effect in keeping appraisal backlogs in check. Currently, there is only one reoccurrence of excessive appraisal backlog – the Rocky Mountain Region. This region was specifically identified in the HLIP for elimination of appraisal backlog, which was completed in Sept. 2000. Regions that continue to have a backlog should not only assess what their staffing needs are to handle the regional workload but also review the use of other appraisal valuation methods that are more efficient in handling certain types of property and real estate.

The original backlog in Rocky Mountain was attributed to several factors, appraisal staff cutbacks, no official regional Chief Appraiser for several years, and the high number of exchanges (e.g. agricultural allotments exchanged for a single homestead) requiring appraisal. The first and third factors still affect appraisal production currently and could contribute to a future backlog. The Northwest region is also reported as having a backlog of appraisals, due mainly to staff turnover.

In the short term the BIA Chief Appraiser is forming backlog appraiser teams to help these two regions reduce and eliminate the backlog. The long term solution for the Northwest region is allotting funding to fully staff the appraisal group and adding an additional Full-time Equivalent (FTE).

Detailed Recommendations

2.5.1 Identify and recommend the most appropriate and efficient appraisal methods for different types of appraisal services

Using the ATB or a working group composed of various regional appraisers examine and recommend the most efficient appraisal valuation methods for similar types of real property in similar areas of the country (not BIA regions). During the ATB or working group examination sessions, have available expert outside appraisers for questions, discussion and alternate viewpoints on conducting appraisal work and appropriate appraisal valuation methods for various property and real estate.

As a possible secondary issue, the ATB or working group can examine the workflow demands and staffing needs for regions with persistent backlogs of appraisals. The ATB or working group's examination should determine a sustainable level of staff to maintain a consistent level of effort to minimize backlog in these regions.

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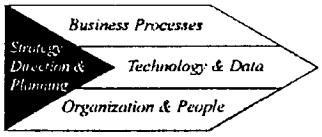
2.5.2 Cross train BIA regional appraisers in various appraisal methods for their general geographic area

The regions should also cross train appraisers to be familiar and competent in appraisal methods that can be used in their general geographic area (not BIA region specific) for property and real estate valuation. Cross training serves two purposes. First, it broadens the experience base of the regional appraisers to handle all the different types of property valuation they could encounter in their environment. Second, it creates a bureau-wide group of appraisers that have the capability to assist other nearby regions with backlog if there is a need.

2.6 Continue to Formalize and Expand ATB Efforts



The ATB has initiated and supported several activities that led to greater standardization of selected processes and broader acceptance of appraisal policies and procedures that encourage consistent use of valuation methods among the regions. ATB will need to continue and expand this focus on these initiatives and other areas of appraisal valuation processes and procedures to encourage and sustain BIA-wide comprehensive valuation practices in accordance with USPAP standards.

Observations and Findings

The BIA Chief Appraiser and regional appraisers indicated that ATB efforts to standardize appraisal processes and procedures are a positive initiative. Regional appraisers saw several benefits from the existence and activities of the ATB such as:

- The ATB promotes and supports certification of regional appraisers and Chief Appraisers.
- The ATB has brought together regional appraisers to discuss and compare regional valuation issues.

All the regions are reported as using the standardized appraisal request form developed by the BIA Chief Appraiser and the ATB. However, there are reports that some regions have modified the form slightly. This is a concern because it impacts the collection of standardized data regarding appraisal requests and will create issues when this process is converted into the TAAMS appraisal module.

While the ATB was cited for positive accomplishments, it was also noted that more work needs to be done (e.g. expanded standardization of appraisal methods, identify and recommend training, clarification of controlling rules regarding appraisals).

Detailed Recommendations

2.6.1 Develop a formal ATB mission statement and a high level strategic plan

The establishment of the ATB was a significant accomplishment but now there are additional actions required to formalize and ingrain the ATB into key development and transformation efforts of BIA's appraisal group. The ATB should develop a formal mission statement and a high level strategic plan. The strategic plan needs to articulate short and long term goals regarding the appraisal program experience level, training, standard practices and procedures and overall professional behavior. The ATB needs to develop a regular meeting schedule that has a formal

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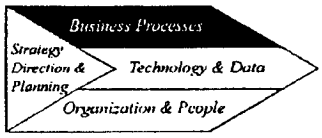
agenda, which identifies key appraisal valuation issues for discussion and resolution. The ATB should also incorporate regular rotation of the regional Chief Appraisers and the Regional Director on the board to encourage greater involvement with and acceptance of ATB activities and decisions.

The ATB should also explore the possibility of bringing outside SME appraiser representatives to attend ATB meetings on a rotating basis. These representatives can provide different perspectives on conducting appraisal work and alternative solutions or recommendations to address BIA issues regarding its appraisal services and processes.

2.7 Update the Real Estate Services Appraisal Handbook



The Real Estate Services Appraisal Handbook (Handbook) was intended to be a primary resource for regional appraisers regarding appropriate BIA-wide appraisal standards. Supplementary *Advisory Opinions* and *Statements* were intended to address issues of professional standards application and provide clarification and elaboration of pertinent provisions in the Handbook.

Observations and Findings

The Handbook was not viewed by the regional appraisers as a primary source for information or standards on conducting appraisal and valuation work in the regional offices. The current edition of USPAP was usually cited as the regional appraisers main resource. The Handbook was last updated in October 1998 and there has been only one Advisory Opinion and two Statements issued subsequent to that last edition.

Regional appraisal staff indicated that the Handbook's value would increase if it was more BIA-specific and incorporated other sources for policy and procedure updates and changes, such as the Deputy Commissioner and other key officials in BIA and DOI.

Detailed Recommendations

2.7.1 Immediately update the Handbook

BIA should create a working group composed of members of the ATB, regional appraiser representatives and outside SME advisors to determine what revisions and updates are required to increase the value and make the Handbook current for regional appraisal staff. One of the areas to address during the Handbook review is updating and adjusting the Handbook's focus between technical and administrative content so that there is a logical and useful balance between these two areas. The regular updating of the handbook will allow it to become more relevant to the BIA. The regional appraisal staff will then be able to use and depend on the handbook as a primary reference source.

2.7.2 Develop a standard schedule for review and issuance of Statements and clarifying Advisory Opinions for the Handbook

The ATB can request input from regional appraisal staff on needed statements and opinions. The ATB can also review current professional writing and research on appraisal valuation methods and practices to obtain the latest ideas on appraising. The ATB can then determine which ideas are useful for BIA's appraisal work and would improve the level of service provided by the regional appraisers. The ATB would then incorporate these ideas and trends into the Handbook via either Statements or Advisory Opinions.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
D. 2.1 Address the Potential Conflict of Interest Issue	6													• Removes "conflict of interest" issue • Enhances management of BIA appraisal resources
D.2.1.1 Review and assess realignment strategies for appraisal program reporting lines of authority	< 6													
D.2.1.2 Review and assess outsourcing alternatives for all appraisal work to independent, real estate appraisal firms	3													
D. 2.2 Continue to Develop Standardized Appraisal Tracking System	12													• Facilitates the tracking of appraisals • Enhances the management of appraisal workloads • Standardizes appraisal data
D.2.2.1 Continue to develop the interim tracking system through DOI's Office of Information Resource Management	< 3													
D.2.2.2 Review and standardize/clean-up data for conversion to TAAMS Appraisal module	12													
D. 2.3 Determine the Need for a Comparable Sales/Lease System	18													• Identifies comparable sales/lease system • Reduces regional appraisal processing time
D.2.3.1 Perform a needs analysis for a national comparable sales/lease system	3													
D.2.3.2 Investigate alternatives for comparable sales/lease information for unique regional needs	15													
D. 2.4 Establish a Performance Metrics Program	9													• Standardizes performance metrics • Identifies areas for process and individual appraiser improvement
D.2.4.1 Develop and formalize a set of standard appraisal services performance metrics	9													

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
D. 2.5 Eliminate Region-centric Approach to Selection of Appraisal Valuation Methods	15			■	■	■	■	■						• Identifies the best appraisal valuation method
D.2.5.1 Identify and recommend the most appropriate and efficient appraisal methods for different types of appraisal services	<6			■	■									
D.2.5.2 Cross train BIA regional appraisers in various appraisal methods for their general geographic area	12				■	■	■	■						
D. 2.6 Continue to Formalize and Expand ATB Efforts	<6			■	■									• Encourages comprehensive efforts to develop and standardize consistent valuation policies, procedures and practices
D.2.6.1 Develop a formal ATB mission statement and a high level strategic plan	<6			■	■									
D. 2.7 Update the Real Estate Services Appraisal Handbook	9	■	■	■										• Establishes the Handbook as the primary resource for appraisers
D.2.7.1 Immediately update the Handbook	9	■	■	■										
D.2.7.2 Develop a standard schedule for review and issuance of Statements and clarifying Advisory Opinions for the Handbook	6	■	■											

@ - Indicates ongoing efforts

E. HLIP 5: Trust Fund Accounting System (TFAS)

1. Overview

1.1 Description

The TFAS Subproject provided for the implementation of a new accounting system. This effort consisted of concept development and approval, issuance of a Request for Proposal (RFP), contracting with a vendor, pilot implementation, data conversion, and production deployment (including user training).

The HLIP states, "a new IIM accounting system was critically needed and long overdue." The objective of this subproject is to replace the existing BIA legacy system which has been described as "incapable of fully performing Trust accounting functions mandated by the Reform Act." The legacy system, Integrated Records Management System (IRMS), was not adequately supporting the requirements mandated by the Trust Reform Act of 1994.

The new application, Trust Funds Accounting System (TFAS), provides financial services to individual Indians and Tribes. It is used to manage the Trust accounting requirements of approximately 262,000 individual Indian and 1,400 Tribal accounts. The individual Indian accounts are managed in a pool environment while the Tribal accounts are managed in separate tribal portfolios. TFAS performs the following major functions:

- Provides standardized "commercial level" Trust accounting.
- Generates distribution checks for individual Indians and Tribes.
- Produces periodic statements and transaction reports for the individual Indian accounts and Tribal accounts.
- Interfaces with other organizations systems, (e.g. BIA, Treasury, Bankers Trust) to exchange appropriate information (i.e. ownership, funds, Explanation of Payment [EOP]).

1.2 Current State

This subproject was successfully completed effective April 2000 (as reported in Quarterly Report No. 2), when all tribal and Individual Indian Monies (IIM) Trust fund accounts were converted to the automated TFAS. TFAS has become the accounting system of record for BIA and OST. It is also used to produce statements and payments to all tribal and IIM account holders.

The TFAS application was implemented using a Commercial-Off-the-Shelf (COTS) package called Trust 3000. This application is owned and operated by its developer and is provided to the government as a contracted service.

Though TFAS has provided numerous improvements in functionality, including substantial reporting improvement over its legacy predecessor, its full potential is yet to be realized. This is due to the limitations in systems outside of TFAS.

An example of an interface limitation is TAAMS, a key system that is not yet fully operational. Specifically, the TAAMS realty function that would provide several key data elements to TFAS has not been implemented. Until the TAAMS realty function is available, the interim solution has been to interface with the legacy applications [IRMS for the surface leases and Royalty Distribution and Reporting System (RDRS) for sub-surface (oil, gas, and minerals) royalties].

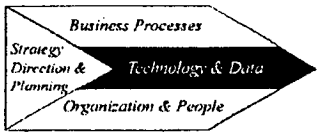
The OST's Office of Trust Fund Management (OTFM), is responsible for the TFAS application. As mentioned above, the application is run by the contractor as a service to the government. Only OTFM users have "create" and "update" authority, while other users (e.g. BIA) are only allowed to view information.

1.3 Recommendation Summary

A formal and documented change request procedure must be established for the TFAS application and its information and interfaces. An online users' guide should be developed to provide help and understanding for both the application and its information. The business processes that are supported by TFAS must be defined and documented to ensure that the design of TFAS is consistent with process requirements. An integrated help desk should be established and available, for all time zones, to support users of all Trust applications.

2. Analysis and Recommendations

2.1 Establish TFAS Application Change Control



Establish a formal and documented process for identifying and requesting changes to the TFAS application, interfaces or information as a result of business transformation.

An application change control process will provide a standard and repeatable method for requesting changes or updates to the application. Impacts to the overall business flow and effects on other applications can be better assessed and understood. Additionally, the overall effort required to make the change can be reviewed and estimated. This results in a complete picture of the effort and impact of the requested change.

Observations and Findings

The COTS solution provided substantial functionality and usability improvement over the legacy application. Since Trust 3000 is a commercial application it is designed to support the majority of its customers' needs and functionality. The contractor operates the same software release for all of its users and only upgrades and/or modifies Trust 3000 when there is a legal requirement or sufficient user group support (Financial Services Trust Network (FSTN) is the national Users Group). Therefore, functional changes to the core Trust 3000 application do not occur often or easily. Customization is supported for preprocessing and reporting functions.

A few key business functions (e.g. account closeout interest calculation) are not part of the COTS package, but an external custom interface solution is providing the missing functionality.

There is a draft change control procedure to request modifications to the COTS package or the interface programs when required to support a business change; however, the draft version has not been approved.

Detailed Recommendations

2.1.1 Formalize and document TFAS application enhancements and upgrade requests

Establish a formal and documented change control process to request enhancements and upgrades to the Trust 3000 user group for incorporation into future product releases by the contractor. These requests may come from OTFM users, other organizations (such as BIA), or regulatory changes. This will provide a formal mechanism to select and prioritize change requests that are submitted to the Trust 3000 user group for consideration.

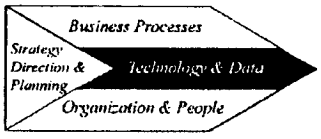
2.1.2 Formalize and document enhancements and upgrades that will be implemented into the application program interface

Establish a formal and documented change control process to request enhancements and upgrades to the application program interface (API), especially when a request will not be addressed by revising the COTS application. The API is a mechanism (usually a program) to transfer information from one system to another. An API can provide simple data transfer or can be as complex as performing algorithmic computation and translation. Since changes to the COTS application are incorporated only when there is a significant critical mass from the Trust 3000 user group, there are requests that only the DOI will need and must be included in the overall functionality. These requests may come from OTFM users, other organizations (BIA), or regulatory changes. The benefit gained from this formal mechanism is prioritized change requests based on business and customer needs.

2.1.3 Formalize and document interface-testing procedures when integrating with new systems

Establish formal, documented and repeatable test cases and procedures to test and validate new or modified interfaces between applications. The value of the procedures is to identify interface problems and resolve them prior to releasing the changes into live production.

2.2 Integrate the Online Users' Guide with Business Information



Develop an Indian Trust-wide online users' guide that provides context-sensitive help for both the application and the business information (such as procedures and regulations).

An integrated users' guide provides Department personnel the ability to quickly and efficiently respond to questions and concerns. This capability makes it much easier for users to find answers to their questions. When customers have questions, concerns, or issues, DOI personnel can quickly respond by performing searches on the user guide. Quick access to information minimizes the "touch-point" with the customer and therefore increases customer satisfaction.

Observations and Findings

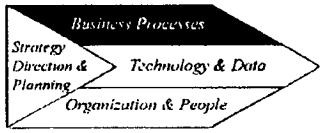
A TFAS Users' guide is available (both in paper and online form) and distributed to users. This manual is provided by the application vendor. Some tailoring of the user guide has been done to accommodate specific TFAS usage. The current guide is cumbersome and difficult to navigate. Several "quick reference guides" in paper are available and used frequently by users.

Detailed Recommendations

2.2.1 Provide a quick, easy and context-sensitive online reference capability

This online guide should provide the appropriate help screen based on where the user is navigating within the application. The help screen should integrate application help with the business procedure pertinent to that part of the application. It will allow the user to quickly locate needed information and result in fewer help desk calls and increase satisfaction.

2.3 Establish Business Processes and Procedures



Develop, revise and document a complete set of business procedures that explain the step-by-step process for all functions, both manual and automated (using applications). Documented business procedures allow for repeatable and efficient processing of customer needs. This also helps to manage training by capturing the knowledge of experienced personnel in the documented procedures.

Observations and Findings

During the development and deployment process of TFAS, some business procedures were documented and distributed to users, primarily through email. The deployment of TFAS included conversion from a legacy system and occurred over an extended period of time. It was staged through the regions and the business procedures were constantly evolving and changing. Regulatory factors also contributed to changed business procedures. As a result, incomplete and outdated business procedures exist.

Laws, regulations, and interpretations are paper based and take a long time to be created and then passed to the personnel who must act on them. When Congress enacts laws there is an inherent time lag to develop the appropriate regulations, policies and procedures. The process of documenting, publishing and distributing those regulations and interpretations also adds more delay to the overall process. It often takes months before a user in the field is able to place a new regulation into practice. This affects all bureaus involved in Trust Management (See HLIP 9: Policies and Procedures Subproject Assessment).

Common data elements (e.g. account ID information) are duplicated in multiple systems across bureaus and lack consistent formats. Since there are several applications involved in the overall Trust process, a proliferation of identification numbers exists. An ID number in one system for an individual may not be the same in another agency. Some systems incorporate "intelligent" keys into the ID numbers, such as the tribe identifier or allotee classification. Changes in business rules and practices can have significant impact on the "intelligent" keys. Collaboration across bureaus is needed to resolve this problem.

Detailed Recommendations

2.3.1 Review, assess, and validate the business processes and procedures and integrate them with the business model in the architecture

Establish business procedures that are integrated with the business function and therefore its business model. This detailed business model is an integral part of the overall Trust Management business model and will provide the visibility to address improvements in the overall business process.

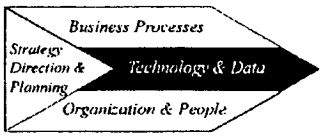
2.3.2 Integrate business procedures with online user guide and regulations

Provide business procedures, regulations and application user guide via an integrated online mechanism. This capability will allow users to quickly search and find answers and provide the customer improved responses to their questions and problems.

2.3.3 Review, assess and normalize common data elements across all BIA and OST applications

Common data elements across applications will facilitate the access to customer information. Additional benefits will result from increased effectiveness and reduced maintenance cost of the system-to-system interfaces.

2.4 Establish Help Desk Availability Across Trust Applications



Establish and operate an integrated help desk that supports all applications across the Trust Management enterprise. The help desk will provide support across all US time zones including password resets and application specific problem resolution.

A consolidated help desk will provide thorough user support during the entire business day. A multi-level help desk allows simple requests, such as password resets, to be handled by less technical personnel. This allows application knowledgeable personnel to focus their efforts on more complicated, application-specific issues along with support of any approved modifications or upgrades.

Observations and Findings

The TFAS help desk is currently available and providing responsive support, yet it has limited staffing and is not leveraged across other systems. Because the help desk personnel are located in Albuquerque, NM., (Mountain Time), nationwide time zone coverage is not available.

Detailed Recommendations

None

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
E. 2.1 Establish TFAS Application Change Control	4													• Allows schedule & implementation changes in an orderly manner
E.2.1.1 Formalize and document TFAS application enhancements and upgrade requests	<3													
E.2.1.2 Formalize and document enchancements and upgrades that will be implemented into the application program interface	<3													
E.2.1.3 Formalize and document interface-testing procedures when integrating with new systems	3													
E. 2.2 Integrate the Online Users' Guide with Business Information	3													• Enhances usability of TFAS
E.2.2.1 Provide a quick, easy and context-sensitive online reference capability	3													
E. 2.3 Establish Business Processes and Procedures	6													• Consistent understanding of policies & procedures for all users & beneficiaries
E.2.3.1 Review, assess, and validate business processes and procedures and integrate with business model	3													
E.2.3.2 Integrate business procedures with online user guide and regulations	3													
E.2.3.3 Review, assess and normalize common data elements across all BIA and OST applications	<3													
E. 2.4 Establish Help Desk Availability Across Trust Applications	12													• Reduces costs by consolidating redundant operations & improves customer service

@ - Indicates ongoing efforts

F. HLIP 6: Trust Asset & Accounting Management System

1. Clarification to Interim Report Published November 12, 2001.

The *Interim Report and Roadmap for TAAMS and BIA Data Cleanup* was published November 12, 2001. By reference, that interim report is incorporated in this final report in its entirety. This section clarifies the recommendation regarding Accelerating TAAMS Title.

In the Interim Report EDS recommended the Department "Accelerate TAAMS Title". This recommendation balanced the ability to progress with an interim solution (and potentially long term solution) in the areas of title and cleanup versus deferring that progress until a comprehensive integrated asset management solution could be implemented. The basis for the recommendation is as follows:

- The TAAMS Current Title module has been used, to varying degrees, in four locations for over one year. The current version is able to support core title functionality.
- Much of the uniqueness of Indian Trust, specifically fractionalization, has already been incorporated in the current TAAMS Title module and would have to be customized for any other title system options.
- Because Title business processes are reasonably consistent across the Regions and LTROs, the current version of TAAMS Current Title can be leveraged to the remaining locations.
- A repository for clean data is needed to support the ongoing BIA Data Cleanup efforts. The legacy system, LRIS, does not provide sufficient validation to prevent cleaned-up data from becoming corrupted. LRIS has been implemented in different ways by the regions, agencies, and Tribes leveraging that system. This has created an environment that fosters inconsistencies and errors in data interpretation and use.

"Accelerating title," means focusing existing resources on the data cleanup activities required to support the nation-wide deployment of core title functionality.

It is important to note the recommendation is not predicated on the introduction of new features or functions in the title module. It was specifically stated that the decision for enhancements should be made based on the costs and the associated benefits. If the costs outweigh the benefits then EDS recommends deferring further development and utilizing the current version as an interim solution.

As recommended in the Interim Report, the Department needs to develop a trust business model. Based on the business model, the Department needs to identify and evaluate appropriate information systems. Information system alternatives should include TAAMS, commercial applications, service bureau, outsourcing and modifications to existing legacy systems. Until this analysis is complete, the Department should continue to leverage TAAMS Title.

G. HLIP 7: MMS Systems Reengineering

1. Overview

1.1 Description

The Minerals Management System (MMS) Subproject within the HLIP acknowledged that there was a need to be "responsive to customer needs and to fulfill its Trust responsibility to American Indians." To adequately fulfill this responsibility, a decision was made to reengineer core business processes and systems that comprise the Royalty Management Program (RMP), an agency of MMS.

The relationship of MMS to overall Trust is that it collects royalty payments for all onshore mineral resources extracted from Indian lands. MMS actually collects royalties for all minerals (including oil, natural gas, coal, etc.) on Federal onshore and offshore lands, which include Indian Trust lands. The royalty payment, along with the accounting detail, is sent to BIA and OTFM for disbursement to the appropriate Indian owners (Tribes or individual allotees).

This HLIP subproject focuses on the complete, top-down reengineering of RMP business functions and processes. Though the entire RMP business (both Federal and Indian on-shore minerals royalty) was addressed through this effort, the uniqueness of Indian leases and their requirements played a significant role in the entire process reengineering and system design activities.

The scope of this project included: documentation of the current business process; review and reengineering of those processes; definition and development of new systems; testing and validating of both the new business processes and systems, and production and deployment. During the early phases of the project, it was validated that RMP consists of two major business processes – finance and compliance. As a result two efforts were undertaken that focused on financial and compliance aspects of royalty management. The financial process collects and disburses royalty revenues from mineral leases, while the compliance process verifies and validates safety, regulatory, reporting and accounting by the lessees.

The assessment summarized in this report focuses on the financial business process and systems. Although the HLIP subproject addresses both financial and compliance, the larger focus was on the financial process. Additionally, the relationship of financial business process to the other Trust subprojects was highlighted as an area of focus. Though compliance is a critical aspect of the responsibilities of MMS, a thorough review of this area would require the proper subject matter experts and a very focused effort.

1.2 Current State

The MMS reengineering effort of RMP has culminated in the business process retooling of the Mineral Revenue Management (MRM) organization and the development and deployment of the new Minerals Revenue System. The core financial system was completed successfully and went into live production on November 1, 2001. Additionally, on November 13, 2001, the first semi-monthly automated transfer was performed of the Financial Distribution Report to Royalty Distribution and Reporting System (RDRS, is a module within the IRMS legacy system). After resolving some data issues, a retransmission on 16th of November resulted in a successful transfer; this was confirmed through discussions with personnel at both MMS and OTFM.

The automated revenue system, currently known as the Minerals Revenue System (MRS), was implemented using a commercial off-the-shelf (COTS) financial system with customization as required to support the MRM business functionality.

During the reengineering and development, industry standards and methodologies were used. This resulted in a comprehensive effort from business process definition through requirements development, system design and development, and acceptance testing. A number of challenges were successfully overcome, including:

- **Business process improvement** – Since the effort was a top-down analysis of the business, both manual and automated processes were reviewed, streamlined, and re-designed. This resulted in improving both data processing and business workflow activities.

- **Acceptance testing** – A testing plan was instituted in July 2001 to ensure the transactions performed and the accounting balances were accurate. Experienced business users developed a representative set of critical "real world" test cases that were used for the validation and acceptance testing. During the acceptance period, any problems identified were documented and appropriate changes and upgrades were incorporated into the system. The system was then retested. Though a degree of stability resulted from the acceptance testing effort, insufficient test cases were used and therefore some problems were identified in the first production run.

- **BIA/OTFM Distribution file (1081)** – The production distribution file uses the legacy system (RDRS) file format. Though a TAAMS file format was available, a joint decision with BIA was made to revert back from the TAAMS format to the legacy system format. (The TAAMS format must be enabled when TAAMS is ready.) This was the result of the uncertain status of the TAAMS project. As mentioned above the first production transfer of the distribution file was successfully performed on November 16, 2001. This provides the data required by both RDRS and TFAS to generate customer information.

- **Performance testing** - The MRS contractor has accomplished performance testing to ensure the computer systems and infrastructure supports the business' operational demands. The tests have been successful. Sufficient system performance provides quick response to the customer's demands for information.

- **Integrated information visibility** – The data warehouse capability is currently under the final stages of development and testing. This capability will allow unprecedented visibility into the data contained in MRS. This will provide the ability to transcend the current reports and enable ad-hoc reporting, business intelligence and enterprise knowledge. The aggregation of information, along with information analysis "slice-and-dice" capability provides the ability to spot trends, make decisions, and troubleshoot. As a result, personnel will spend more time analyzing information rather than collecting data.

Finally, several issues that plagued the legacy system were addressed and corrected through process, data, or functionality changes. These issues were:

- Additional detail in Explanation of Payments (EOP) - new information is available in the EOP part of the Distribution File from MRS, but IRMS system has yet to include this information in the actual printed statements.

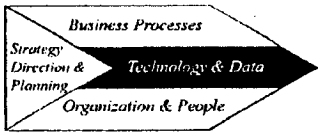
- Adjustments to current production estimation errors on mineral lease accounts resulting in negative balances – this was resolved by not allowing the adjustments to drop below 50% of the current period royalty.

1.3 Recommendation Summary

The EDS Team recommends establishing a formal and documented process for identifying and requesting changes to the MRS application. Changes requested from organizations outside of MMS must also follow this procedure. Also required is a formal and documented process for identifying and resolving transaction errors and issues that occur in interfaces with other systems. The business processes and procedures must be developed for the royalty disbursement area. Finally, to support a beneficiary-centric focus, DOI must provide authorized users (e.g. bureau personnel, tribes, and individual allotees) access to appropriate data in all Trust applications.

2. Analysis and Recommendations

2.1 Establish MRS Application Change Control



Establish a formal and documented process for identifying and requesting changes to the MRS application, interfaces or information as a result of business transformation. The change control process must address requests that come from both internal (MMS) and external (e.g. BIA) organizations.

The change control process will provide a standard and repeatable method for requesting changes or updates to the application. Impacts to the application, overall business flow and affects on other applications can be assessed and estimated. Additionally, the overall effort required to make the change can be reviewed and estimated. This results in a complete picture of the effort and impact of the requested change.

Observations and Findings

The customized COTS solution provides substantial functionality and usability improvement over the legacy application. However, additional improvements and upgrades are needed to continue to support the enterprise. Though a well-defined change control approach was used throughout the development effort, nothing has yet been established for on-going system maintenance.

Detailed Recommendations

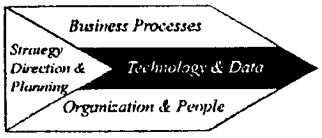
2.1.1 Formalize, and document enhancements and upgrade requests that are not implemented in the MRS application

Establish a formal and documented change control process to request enhancements and upgrades, whether they affect the MRS application or its interfaces. These requests may come from MRS users, other organizations (such as BIA), or as a result of regulatory changes. The benefit of the upgrade process is to provide a systematic and prioritized method to revise the application based on business and user needs.

2.1.2 Formalize, and document interface-testing procedures when integrating with new systems

Establish formal, documented and repeatable test cases and procedures to test and validate new or modified interfaces between applications. The value of testing procedures is to ensure data integrity among the interfaced systems. Since these procedures include test cases, a broad sample of data will ensure that information flowing between the systems is accurate.

2.2 Resolve Information Exchange Issues Between MRS and all Systems



Establish formal and documented processes for identifying and addressing both operational data exchange errors and system design impacts that occur in interfaces with other systems. These resolution processes must address issues, problems, and system changes that come from both internal (MMS) and external (e.g. BIA) organizations.

The resolution process will provide a standard and repeatable method for addressing problems, errors, omissions, issues, and system changes that occur in the exchange of information between systems. Impacts to the overall business flow and effects to other applications can be assessed and estimated. Additionally, the overall effort required to make the change or correction can be reviewed and estimated. This results in a complete picture of the effort and impact of the required change to all systems.

Observations and Findings

Sufficient and complete procedures have not been established to resolve information exchange issues between bureaus. This relates to both operational data transactions and the effects of application functionality revisions. Collaboration among bureaus must take place to establish, revise, and document cross-bureau resolution procedures. Examples of information exchange include transactions files between MRM and BIA for lease and royalty payments.

Detailed Recommendations

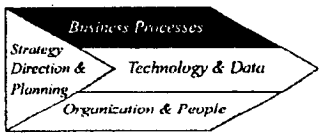
2.2.1 Establish a formal process for identifying and resolving operational information exchange errors that occur between bureau systems

Establish a formal and documented process for identifying and resolving transaction errors that occur during normal operations between systems. An example of this is when transactions are rejected in the batch files between MMS and BIA.

2.2.2 Develop a formal process to resolve impacts from a design change to one system that affects other interfaced bureau systems

Establish a formal and documented process for identifying and resolving impacts from a design change which impacts a system with which it interfaces. Negotiation between bureaus should occur to determine where to incorporate changes.

2.3 Establish Procedures Regarding Royalties Disbursement



Develop, revise and document a complete set of business procedures that document the step-by-step process for all functions whether they include manual or application-automated steps in the royalty disbursement process. MMS' process reengineering effort focused on the area of royalty collection; therefore, the royalty disbursement portion needs to be addressed along with the royalty collection.

Documented business procedures allow for repeatable and efficient processing of customer needs. This also helps to manage personnel training by capturing the knowledge of experienced personnel in the documented procedures.

Observations and Findings

Laws, regulations, and interpretations are paper based and take a long time to be created and forwarded to the personnel who must act on them. The process of documenting, publishing and distributing also adds more delay to the overall process which often takes months before it is placed into practice. Often this involves manual work arounds or interim procedures to satisfy the changes. This affects all bureaus involved in Trust Management (See HLIP 9: Policies and Procedures Subproject Assessment).

Common data elements (e.g. account ID information, lease numbers) are duplicated in multiple systems across bureaus and lack consistent formats. Since there are several applications involved in the overall Trust process, a proliferation of identification numbers exists. As an example, an ID number in one system for an individual may not be the same in another system. Also, some systems incorporate "intelligent" keys into the ID numbers, such as the tribe identifier or allotee classification. Changes in business rules and practices can have significant impact on the "intelligent" keys. While MRM uses common data elements within its systems, collaboration across bureaus is still needed. (See Breach 3: Computer and Business System Framework Plan.)

Detailed Recommendations

2.3.1 Establish the business processes and procedures for royalty collection and disbursement

Develop the business procedures that are integrated with the business function and therefore with the MRS business model. This detailed business model is an integral part of the overall Trust Management business model and it will document the entire process of royalty collection and disbursement.

2.3.2 Integrate business procedures with online user guide and regulations

Expand the online users guide to include both the business procedures and the appropriate regulations. This will allow users to quickly access the information needed to perform their tasks.

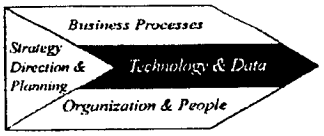
2.3.3 Normalize common data elements across all Trust applications

Progress made toward common normalized data will greatly improve the effectiveness and reduce the maintenance costs of system-to-system interfaces. Normalized data provides resiliency from

business changes by structuring it to avoid redundant storage and possible loss of data integrity across multiple systems.

2.4 Provide Customer Information as Appropriate

Extend the data warehouse capability beyond MRS, to systems in other bureaus, to provide authorized users (e.g. bureau personnel, tribes, and individual allotees) read-only access to their own data in all Trust applications.



Through either the integration of the MRS data warehouse with other bureau (e.g. BLM, BIA, etc.) applications or expansion of the data warehouse environment, this functionality will provide enterprise wide or customer specific information to authorized users. This capability will allow authorized users to view, review, analyze and report on information in their account across multiple time frames, property holdings, leases, or other asset related data. Additionally, it will allow DOI personnel to analyze, assess, correct and optimize business information.

Observations and Findings

COTS reporting and data warehouse solutions, a part of the MRS application, will provide substantial reporting improvement over the legacy application. This capability is currently targeted to support only the MRM user community (industry, states, Tribes, and other bureaus). This functionality, completed before the end of 2001, should be leveraged and available in Trust applications for other bureau (e.g. BIA).

Detailed Recommendations

None

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos.)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
G. 2.1 Establish MRS Application Change Control	<4													• Allows schedule & implementation changes in an orderly manner
G.2.1.1 Formalize and document enhancements and upgrade requests that are not implemented in the MRS application	<3													
G.2.1.2 Formalize and document interface-testing procedures when integrating with new systems	<3													
G. 2.2 Resolve Information Exchange Issues Between MRS and all Systems	<3													• Ensures that databases of disparate systems are synchronized with MRS
G.2.2.1 Establish formal process for identifying and resolving operational information exchange errors that occur between bureau systems	<3													
G.2.2.2 Develop a formal process to resolve impacts from a design change to one system that affects other interfaced bureau systems	<3													
G. 2.3 Establish Procedures Regarding Royalties Disbursement	<6													• Consistent understanding of the business flow for all users & beneficiaries
G.2.3.1 Establish the business processes and procedures for royalty collection and disbursement	3													
G.2.3.2 Integrate business procedures with online user guide and regulations	<3													
G.2.3.3 Normalize common data elements across all Trust applications	<3													
G. 2.4 Provide Customer Information as Appropriate	3													• Achieves beneficiary-centric focus through improved access to information

@ - Indicates ongoing efforts

H. HLIP 8: Records Management; Breach 2: Retention of IIM-Related Trust Documents

1. Overview

1.1 Description

The objective of the Records Management subproject is to implement a unified records management solution for Interior Trust records involving OST, BIA, MMS, BLM, OHA and other participating DOI Offices. A unified records management solution would take into account economical and efficient management of Trust records, consistent with the American Indian Trust Fund Management Reform Act of 1994 and the Federal Records Act. This includes a number of specified actions and reforms covering the full range of records issues including program management, records retention and storage, training, and electronic records management. The responsibilities of the Office of Trust Records (OTR) include the management of federal records through the entire records lifecycle, improving the current records management practices and creating consistent records management for the future.

The records retention breach is also the responsibility of the OTR. The response to this breach as defined by the court is to, "establish written policies and procedures for the retention of IIM-related Trust documents necessary to render an accurate accounting of the IIM Trust."

1.2 Current State

The OTR has done considerable work locating, cleaning, filing and storing federal records existing in the field offices for BIA and OST. As there had been little attention paid to records management and retention over the past few decades within BIA, the OTR had a large amount of work to cleanup the records. The OTR made the decision to move forward on centralized storage of documents as part of its HLIP plan. As of the last interview with the OTR, four of six sections of records had been scheduled and submitted to National Archives and Records Administration (NARA) for comment, two other sections have been drafted and submitted for internal comments within BIA/OST.

Records evaluations have been done at the majority of field offices and the OTR is currently on schedule to complete all remaining evaluations by December 2001. Training has been done at all but one of the field offices, Approximately 2,172 persons have attended the OTR's half day "Records Awareness" training out of the 5,247 BIA and 400 OST Full Time Equivalents (FTE). The two day Basic Records Training has been given to 551 field staff. Approximately 57,900 of a possible 80,000 boxes of BIA Federal Records and 31,000 of 37,500 of OTFM Federal Records located at field offices are in various stages of the records lifecycle including: identification of documents as federal records, cleaning /restoring of records, inventorying and transferring to Federal Records Centers where they are properly stored.

The OTR has made significant progress in the retention, cleaning and storing of paper Federal Records. There will be a continued push by the OTR staff to meet the obligations of the Federal Records Act, for paper records.

The OTR has not made as much progress with electronic records. Currently, the DOI CIO has put a moratorium in place halting the development of Electronic Records Management (ERM)

systems, as part of Interior policy to coordinate future systems development. This causes all employees of BIA and OST to follow antiquated processes for the retention and storage of electronic records. Currently all BIA and OST staff print all electronic records and file and store them as paper. This is not an uncommon process throughout the federal government, however it is inefficient and in need of change.

The OTR has a small staff providing coverage for records management and retention in many locations and in various areas of the records program. This staff is overburdened with the cleaning, filing and storing of records and running the Records Management Program. Currently within OTR there is a:

- Lack of project management for effective planning and measuring of progress (specifically risk management, performance management and project scheduling with dependencies, etc.).
- Limited effective communication and perception issues with the general BIA and OST field staff required to do records management on a daily basis.
- Lack of focus on institutionalizing records management into the daily work of all BIA and OST FTEs.

The objective of institutionalizing a unified records management program is currently being overshadowed by the efforts to fix the past records management problems.

1.3 Recommendation Summary

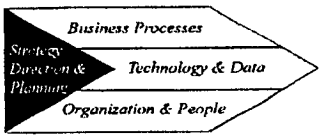
Based on analysis completed using information collected during interviews with the OTR and industry standards in the area of records management, the following recommendations are suggested:

- Elevate the creation and maintenance of an Ongoing Records Management Program to the forefront of OTR's responsibility.
- Escalate electronic records issues on priority list.
- Increase communications regarding Records Management.
- Expand Records Management resources.

Given the complexity and importance of these recommendations to the OTR, a discussion of each is found below. All aspects of a full and institutionalized records management program are equally important. All issues facing the OTR need to be addressed and be given the attention and staffing needed to be successfully resolved. Therefore, the following recommendations are made with the expectation that the current work on record retention, filing, scheduling and disposition will continue. As a result, a balance will be struck to continue fixing the current and past records issues, and start work in other important areas of a records program.

2. Analysis and Recommendations

2.1 Elevate Ongoing Records Management Program



Each federal agency is required to address the needs of the organization in the area of the life cycle of records. Also, all agencies are required to adhere to policies and procedures surrounding creation, maintenance, use and disposition of federal records. Records Management is essential for providing accurate and reliable information to account holders. The OTR needs to continue its work in completing records schedules for paper records and systems of record; establishing formal policies and procedures for records retention, and coordinating procedures with other agencies on Trust records procedures. Records Management needs to be pushed out of a central office and to all the employees working with the Indian Trust, to ensure that proper records management practices are being followed.

Observations and Findings

There have been significant strides by the records management team to find, collect, cleanup and schedule Trust records already existing within BIA and OST. However, it appears that the objective of producing a unified records management solution is only at the beginning of its overall development and implementation. Most of the work coming from this office has been focused on the resolution of old records problems. Prevention and program maintenance needs to be brought to the forefront of the records management program at all BIA and OST field offices.

The project is not managed from a proactive program/project management perspective, rather the deadlines are managing the project and the people. There is a spreadsheet used to help prioritize management activities of breach resolution and training activities versus traditional program management tools.

Part of the program lifecycle of the OTR needs to include the protection of its vital records. Currently the disaster recovery plan for vital records has been put on hold. As the Trust Management and accounting for individual and tribal accounts relies on the records kept by BIA and OST in it's field offices and headquarters, it is critical for them to know which records are vital and how to protect them, in the case of a disaster.

All subprojects are indirectly impacted by records storage and retention. The Lifecycle Database provides a user-friendly locator for the stored or retired records. This database will play an extremely important role for the clean up efforts and the Office of Historical Trust Accounting (OHTA) as they proceed down the path of locating and cleaning up missing information. The Lifecycle Database provides an opportunity to involve field staff in records management. Currently there is a perception in the field that the OTR is taking away the regions' records and that they will be misfiled or lost. Currently, the regional offices do not have the ability to observe or participate in the records management filing, storing and retrieving process.

Detailed Recommendations

2.1.1 Institute program management disciplines in Records Management

Consistent program management practices need to be adopted by each subproject area, and Records Management is not an exception. Currently, OTR is using project management tools for historical reporting rather than planning. The project appears to be run by knowledgeable people

in archiving, but not in project management. The OTR needs to adopt practices consistent with the project management disciplines and the Trust Program Management Center (TPMC) (refer to Section IV: Trust Enterprises Analysis and Recommendations section of this document) in the areas of managing schedules, resources, risks, communications, budget and performance metrics. Through the use of good project management tools and appropriate staff for monitoring, the OTR can strategically balance the implementation of various objectives, placing equal emphasis on retention and clean up duties, as well as prevention and program obligations.

2.1.2 Publish Disaster Recovery Plan for Vital Records and begin implementation

There are currently no published plans or policies in place for disaster recovery of vital records. Vital records are those records that are essential for continuing to carry out the business of the organization from which they were produced. A disaster recovery plan is essential for all records deemed vital to the continuation of the Native American Trust operations.

An inventory must be completed for all paper records and electronic systems (records) that would be considered vital to the operation of the Trust. These vital records could be located at each of BIA/OST field offices. Back up and storage plans should be created, implemented and updated regularly to ensure complete safeguarding of all vital BIA and OST records. The OTR should be proactive in devising policies and procedures for the backup and storage of vital records and communicating those to the field offices and subproject teams working within the Trust environment. The OTR Program Manager needs to be given the authority to drive the policies and procedures for disaster recovery plans for all Trust systems used in the field and introduced by the IT groups within BIA/OST.

2.1.3 Continue with Records Lifecycle Database as an interim measure

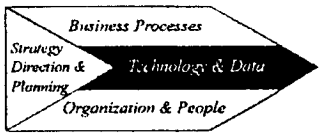
The Lifecycle Database that is currently being implemented by the OTR is primarily to be used to give BIA/OST intellectual control over their records. The Lifecycle Database provides one location where all paper records (active and inactive) can be inventoried. The lifecycle database provides the OTR staff with the ability for user-friendly storage of paper records.

The OTR should continue the work on the Records Lifecycle Database. Further, they should use this database as an interim measure, until they are able to put into place an ERM system capable of replacing the Records Lifecycle Database (see Recommendation 2.2 below). The database can provide assistance to already overburdened OTR staff in filing and locating records sent to central storage facilities. The database enhances the decision to centrally store all records, by providing an easy way to find those records that are still needed for work done in the field. This database will help to make the centralization of records storage user friendly and easier to implement.

The Lifecycle Database is a good interim measure. Once the OTR moves to an ERM system, work must be done to ensure that this interim database can be converted or migrated into the ERM. The OTR will need to ensure that there can be migration or integration of the two systems to eliminate the possibility of maintaining two separate systems for paper and electronic records.

Access to the Lifecycle Database should be extended to the regional offices. Currently, there is no way for the regions to observe the records management process of filing, storing or retrieving records. The Lifecycle Database provides OTR with the opportunity to have the records process transparent to the customers (regional offices). Providing global access to the database creates intellectual control over records, allows the field offices to be directly involved in Records Management, and will combat the negative perceptions of centralized records management in the field.

2.2. Elevate Priority of Electronic Records Issues



Electronic Records must be treated with the same alacrity as the paper records. All electronic records must be maintained under the stringent requirement of providing 100% availability while guaranteeing that no data will be lost. [1] A faithful representation of the content and context of the electronic records is needed in a dynamic ERM system to maintain proper storage and for future use of those records.[2] The current state of the OST and BIA is that the majority of the records being produced are electronic, these include emails and memos to documents and reports, however, these documents are stored in paper. The OTR needs to accelerate its records management program around records created and maintained by electronic media. A properly implemented Electronic Records Management Program will assist in conducting business in an orderly, efficient and accountable manner that also meets the legal, or audit requirements, by preserving and protecting the organization's vital records.

Observations and Findings

An ERM system allows for the capture and management of electronic records and is an essential component of an organization's records management program. The DOI CIO has called for a moratorium on ERM Systems until a gap analysis of each Bureau's electronic records status is completed. As a result, progress in this area is being slowed.

There have not been any policies or procedures published regarding electronic records for general consumption by the regional offices required to comply with records management policies and procedures. Training appears to be used as a major answer to the problems of Records Management. However, training can only go so far. Policies and Procedures are also required around which the training should be fashioned. These policies and procedures are those things which people revert to after training is completed.

Without the proper procedures, policies and systems in place to manage the storage, retrieval and disposition of electronic documents, there is a great risk that organizational memory will be lost and statutory requirements for federal records may not be met.

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[1] Moore, Reagan, et al. "Configuring and Tuning Archival Storage Systems "[article on line] (San Diego, CA: San Diego Supercomputer Center, 2001); available from http://www.sdsc.edu/NARA/Publications/OTHER/Persistent/Persistent.html; Internet.

[2] Ludascher, Bertram, et al. "Towards Self-Validating Knowledge-Based Archives "[article on line] (San Diego, CA: San Diego Supercomputer Center, Jan 18, 2001); available from http://www.sdsc.edu/TR/TR-2001-01.doc.pdf; Internet.

Detailed Recommendations

2.2.1 Perform process analysis for electronic document filing, storing and disposition

The first step in the implementation of an ERM system should be to look at the full process flow for electronic documents, to include the entire lifecycle from creation to disposition. Complete analysis of the process flows for electronic documents should include the documenting of the flow and any changes needed for improved efficiency and effectiveness. Identification of the various roles and responsibilities of those required to participate in the process flow should also take place during this step. The process currently used for paper documents should be updated to reflect the best use of the ERM system for the tracking of paper documents.

2.2.2 Create file plan for all records

Once the process analysis is complete the OTR will need to create a file plan. A file plan will allow a more user-friendly approach to storing records. As a tool, the ERM system will be accessed by all employees, therefore, there will need to be a system for filing records. The file plan outlines how all records should be filed for storage in the ERM. This allows staff at various locations to store records consistently. The file plan should include all areas of the business. Staff in the field need to be able to use the file plan without doing too much analysis in order to file records. The file plan will need to be incorporated into the OTR training program to ensure that all staff understand the value of and how to use the file plan properly.

2.2.3 Migrate to a complete Electronic Records Management system

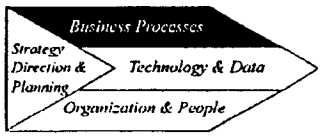
The primary objective of an electronic archive is the long-term information preservation along with the ability for sustained access of the archived information for later use. When an ERM system is put into place within an organization, notification is automatically generated when the documents should be destroyed and help ensure that the formal retention and disposition policies are carried out. An ERM system will provide workflow processes for managing records in a reliable and consistent manner. The system can provide the users with global access to documentation and its contents as well as provide for easier and wider retrieval capability, as opposed to a paper system. All Trust employees should have access to this system and understand how to use it properly for the filing, storing and retrieving of Electronic Federal Records. Loss of valuable organizational and federal records is significantly reduced when documents are stored in their electronic format versus paper, and the cost for recovery is usually much more manageable. ERM system solutions promote increased stability to the storage of records, and optimal storage and usage of filed records.

OTR should begin with ERM requirements definition based on long term goals that will ensure that BIA/OST will meet its statutory obligations and provide a unified records system for agency wide application. These requirements should include the ability to store all trust documents as defined by the new trust management organization defined earlier in this document, thus expanding the scope of the current records management charter. Also, there will need to be consideration for the migration of the Records Lifecycle Database into this ERM system. The OTR should be running only one system for the tracking of all filed paper (that are tracked electronically) and electronic documents. The new process flows, roles and responsibilities and needs of the field should be taken into consideration when defining system requirements. A proper system development lifecycle should be used during the design, implementation and rollout of the ERM system. The OTR will need to follow the guidelines of BIA/OST architecture and consider user input when determining the requirements for the ERM system.

2.2.4 Publish policies and procedures for electronic record retention

Policies and procedures are the key to informing the organization's staff about records management principals and for enforcement of proper records management. Electronic records policies and procedures provide a baseline for all staff within the organizations. Policies and procedures are the practical and implementable guidance for staff to apply the Electronic Records Retention statute. Publication will allow greater access and standards for Trust employees who are responsible for electronic records management in the field.

2.3 Increase Communication Regarding Records Management



Communication planning should provide critical links among Trust Management employees to share ideas and information that is required for the successful implementation and governance of a records management Program. In order to gain complete support and understanding for effective records management, all employees should be involved in sending and receiving appropriate communications and information. This recommendation is intended to go beyond the current records training, in ensuring field staff understanding and support, and correcting any misperceptions regarding the Records Program.

Observations and Findings

The field offices within BIA and OST bear a large part of the responsibility for records management, and they have clearly stated that there is a lack of effective communication about records management. Training, education, relationship building and communications have all been bundled together under the topic of training. Beyond the general notion of training, there is not a lot of time concentrated on how records management work will be institutionalized, or how records management issues will be prevented in the future.

This subproject is not involved enough in the records management that is occurring in the field. The OTR is limiting their affect on records management in the field by not interacting or taking the role of educator/consultant to the people who are expected to perform basic records management as part of their daily work responsibilities. OTR is not involved enough in the daily operation. Due in part to separate organizations, there is currently little or no communication and coordination with other subprojects or with the field offices beyond the basic training course and consolidating the records for centralized storage.

Detailed Recommendations

2.3.1 Create a Communications Plan

The communication plan outlines the dialogue that needs to occur as a result of the rollout of records management and the deployment of an Electronic Records Management Systems. A communication plan outlines the stakeholders and key messages to be conveyed strategically and systematically. Specifically this communication plan has to indicate how to inform the interested parties about the records management functions and each individual employee's role in records management. Through the communication plan, OTR's goal will be to provide information and begin to decrease resistance by educating people up front through the consistent and continuous letting of information (refer to section 1.2 in the Overall Trust Recommendations).

2.3.2 Create an Employee Outreach Initiative

In order to reach out to the employees expected to perform records management properly for both paper and electronic records, it is necessary for the OTR to make records management as user friendly and easy as possible if institutionalization is expected to occur. The OTR needs to create an outreach initiative that will assist all employees of BIA and the OST in carrying out their records management duties for better Trust Management. This outreach initiative needs to provide a variety of ways for the users to access information and help with records management issues. Hotlines, the use of a web site, and dedicated Records staff to consult on records management, should be used to begin to ease the use and institutionalization of records management within the every day working life.

2.4 Expand Records Management Resources

The OTR affects every single individual within BIA and OST. Any record that is involved in any way with the management of the Trust must be properly maintained, stored and disposed. The OTR must cover the many field offices in 12 different regions and headquarters. The records are the key to establishing the facts surrounding Individual Indian monies and tribal accounts. To ensure that there is success in the records management program and that BIA and OST meeting their statutory obligation, there needs to be more staff to perform the duties of the OTR.

Observations and Findings

There are not enough staff in the OTR to effectively execute records management in the basic statutory sense, achieve institutionalization of records management within the BIA and OST, provide constant contact with the various people in the field expected to perform records management, and manage a complex project/program environment.

There are currently 69 FTEs employed by the OTR who are required to perform all the work expected of the OTR. This job includes, but is not limited to, yearly evaluations of BIA regional offices and agencies, training of all people in the field, training of new staff members; training of Records mangers/field managers; creating policies and procedures, running pilot projects, managing contractors; creating and maintaining records schedules; and performing project.

There have been no liaisons established between records management and the other subprojects dealing with data, records and historical documents. The OTR is run by experienced archivists and records managers, however, there is a lack of project management skills on the current staff. The 12 regions and the field offices are running records programs without any direct point of contact or consistent and regular contact with the OTR and its current staff.

Detailed Recommendations

2.4.1 Place a trained and full time dedicated records manager at each region

The OTR needs to be accessible at all times to all employees in the field. The records created and kept in the field offices are critical to the management of the Trust and need to be elevated in importance. A full time records manager for each region would provide a point of contact for both the field staff as well as the Program director for records management. A full time person per region can assist in the coordination and communication efforts taken on by the OTR. They will also be in place to assist with the prevention of misfiled or inadvertently destroyed records.

The full time records person in each region should report to the Program Director of the OTR in order to maintain the consistent authority needed to proceed with effective records management.

2.4.2 Create a Communications Coordinator position

To ensure success for all communication and outreach activities under the program of records management, a full time staff member needs to be in place. The records program must perform a balancing act between the proper storage, cleanup and retention of old records and the outreach required to institutionalize proper records management as part of the work culture of BIA and OST. Coordinated and consistent information can provide the OTR with the bridge needed to enhance the relationship with the region and field offices.

2.4.3 Expand the leadership staff to include a Professional Project Manager

The success of the program depends on having directed and coordinated management of the effort. The role of the project manager is to control resources and schedule of activities within records management to ensure a balance between all priorities and objectives for records management and the achievement of priorities of objectives.

A full time professional project manager can provide structure to governance, oversight, control at the enterprise, and project level. The Project Manager ensures that adaptive rigor has been effectively employed, and that disciplines such as scope, schedule, cost, and risk management are properly applied to single activities or to multiple activities managed in the records management program.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
H. 2.1 Elevate Ongoing Records Management Program	12		• Provides continued preventative measures against the mishandling of Federal Records
H.2.1.1 Institute program management disciplines in Records Management	<6		
H.2.1.2 Publish disaster recovery plan for vital records and begin implementation	<6		
H.2.1.3 Continue with Records Lifecycle Database as an interim measure	12		
H. 2.2 Elevate Priority of Electronic Records Issues	@	@	• Allows the DOI more flexibility and accessability to electronic records
H.2.2.1 Perform process analysis for electronic document filing, storing and disposition	3		
H.2.2.2 Create a file plan for all records	6		
H.2.2.3 Migrate to a complete Electronic Records Management System	@	@	
H.2.2.4 Publish policies and procedures for electronic records retention	<3		
H. 2.3 Increase Communication Regarding Records Management	@	@	• Creates a greater understanding of the responsibilities and importance of good Records Management
H.2.3.1 Create communications plan	@	@	
H.2.3.2 Create an employee outreach initiative	@	@	

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
H. 2.4 Expand Records Management Resources	9													• Enables the OTR to meet all its program and statutory obligations
H.2.4.1 Place a trained and full time dedicated records manager at each region	6													
H.2.4 2 Create a communications coordinator position	6													
H.2.4 3 Expand the leadership staff to include to a Professional Project Manager	6													

@ - Indicates ongoing efforts

I. HLIP 9: Policies and Procedures

1. Overview

1.1 Description

The concept of establishing a system of policies and procedures is to apply consistent, standard methods of achieving business results while allowing continuous improvement. It is also a means of adhering to the laws and statutes passed by Congress. Writing the policies and procedures is the first step in the process, they must then be communicated and training provided to ensure ease of use and compliance. The last step in the process is to implement a measurement system that allows management to "take the pulse of the organization" and make changes as needed.

As stated in the HLIP, "The Reform Act requires that the policies, procedures, practices, and systems of the Bureau of Indian Affairs, the Bureau of Land Management, and the Minerals Management Service that are related to the discharge of the Secretary's Trust responsibilities are coordinated, consistent, and integrated." The subproject requires coordination with key officials from the Bureau of Indian Affairs, Office of the Special Trustee, Office of Hearings and Appeals, Minerals Management Service, Office of Surface Mining, Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, National Park Service and the U. S. Geological Survey. The objectives of the subproject are:

- Trust principles for Departmental management of Indian natural resources and Trust funds will be developed and issued.
- Current regulatory provisions for Indian Trust programs will be reviewed and revised as necessary to ensure the fulfillment of the Secretary's Trust responsibility.
- Legislation will be proposed to modernize and clarify ambiguous and outdated statutes governing Trust programs, to enact new provisions where statutory guidance is essential, to harmonize inconsistent provisions, and to repeal outdated or unnecessary provisions.
- Internal program guidance related to the management of Trust programs within and among all affected Departmental bureaus and offices will be reviewed and revised as necessary.

1.2 Current State

An important first step for the Policies and Procedures Subproject was to identify the Trust Principles as outlined in the Secretary's Executive Order 3215 signed April 28, 2000. Activities of the subproject (for the past two years) have been based on these Trust Principles and progress has been made. The Policies and Procedures subproject has involved BIA staff throughout regions and field offices in drafting and reviewing policies and procedures – however, the process is lengthy. Due to the length of time required and lack of resources available for procedure development, there are many regulations yet to be written that are required to carry out Trust Management responsibilities. In 2002, the Subproject intends to return to 3 areas it was unable to complete in 2000/2001. These include Leasing (business and residential leases), Probate (work that was not completed in FY 2001), and Supervised Accounts.

Trust-related policy and procedure development is disjointed and uncoordinated across all bureaus and offices providing Trust Management functions. The subproject has had very little coordination with trust-related organizations outside of BIA that are also developing policies and procedures. The current focus of the subproject is primarily on BIA policies and procedures. For example, OST has its own organization developing policies for OTFM and has no connection with the subproject. As part of the HLIP, the subproject undertook an examination of cross-cutting issues and problems related to Trust Management programs across the Department. The HLIP did not define who was to correct these issues and problems and no actions have been taken on the results.

Originally there were four areas of focus for revising or developing new BIA regulations undertaken by the subproject in the first year: Leasing, Grazing, Trust Funds Management and Probate. These areas were identified based on their importance to the generation and management of Trust income. Further areas of focus extending into 2004 were defined in a report to the TMIP Steering Committee submitted in April 2001[1].

The current BIA/OST organizational structure does not promote the implementation of, or monitor adherence to, policies and procedures. Since the inception of OST, roles and responsibilities between BIA and OST have not been clearly defined, causing conflict. OTFM has no authority to force BIA to comply with their policies resulting in on-going contention between the two organizations. An Interagency Handbook is in the process of being developed to address these areas of conflict, but it has taken over a year to develop and is not yet in place. The HLIP does not discuss the Handbook, but the subproject has been directly involved in its development.

Many old out-of-date regulations still remain as part of the 25 CFR (Code of Federal Regulations), as well as outdated manuals and handbooks, causing confusion between the use of the new ones versus the use of the old ones. The subproject has identified this area as a priority for 2002.

1.3 Recommendation Summary

EDS recommends DOI manage all Trust related policies, procedures, and regulation development through one organization within the proposed the Indian Trust. Actions required to support this recommendation include:

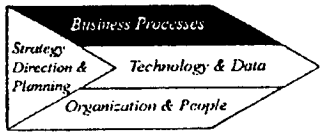
- Bring all policy and procedure development and coordination into one organization that is responsible for all Trust Management practices. This will allow a "big-picture" view of all Trust related policies and procedures as well as ensure the procedures across multiple work groups do not conflict with one another.
- Provide oversight of policy and procedure development and implementation through a central governing body to ensure compliance with Office of the Comptroller of the Currency (OCC) directives.
- Appoint an effective, permanent leader over the organization to provide leadership and direction to all Trust related policy and procedure development.

[1] Report to the Trust Policy Council, Review of Regulations and Program Guidance (BIA, April 2001).

Given the immense scope of the issues, including the number of offices, bureaus and agencies involved, it is crucial that a centralized organization be appointed and given the direction to address this situation on a full time basis. Authority must be given to the proper individuals and/or oversight body to implement the policies and procedures across all lines of business and to enforce adherence.

2. Analysis and Recommendations

2.1 Establish Coordination of Policy and Procedure Development



All trust-related policy and procedure development should be coordinated through one organization within the Bureau of Indian Trust Assets Management. The Policy and Procedures Subproject has been under capable, but temporary leadership for the past two years; however, a permanent leader is needed to assume control and provide direction to ensure consistent, relevant, and timely policy and procedure development occurs for all trust-related areas.

This leader will build a team to develop Trust related policies and procedures as well as provide support to Program Offices on their specific procedures pertaining to Trust.

Observations and Findings

Trust-related policy and procedure development is disjointed. There is no coordinated effort throughout the Department on trust-related policies and procedures. In addition, a single leader does not oversee all Trust policy and procedure development. There is no final decision maker for establishing regulations. Decisions are made most often by committee and this is time-consuming.

Due to the 1999 decision by the Assistant Secretaries of Indian Affairs and Policy, Management and Budget, as well as the Deputy Special Trustee, the scope of the subproject was focused on BIA policies and procedures only. The subproject has very little coordination with Trust organizations outside of BIA that are also developing policies and procedures, leading to conflicting procedures as well as overlapping responsibilities.

The subproject provides oversight to Program offices for their detailed "how to" policies, handbooks, and manuals. However, Program offices (at Central Office) are not keeping program-specific policies, procedures, and associated handbooks up-to-date and no one is requiring them to do so.

Detailed Recommendations

2.1.1 Establish the role of Director of Policy & Procedure within the Indian Trust Organization

This role will function as the final decision maker with the authority and responsibility to put policies in place. It is essential that strong management support and commitment to consistent policies and procedures be established early in the development of the Indian Trust organization to ensure their success. This role would also serve as a congressional liaison to understand the schedule and impact of new laws passed and the retirement of old laws no longer in effect.

2.1.2 Expand the activities of the subproject to include all Trust related policies and procedures

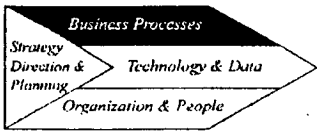
Under direction of the Director of Policy & Procedure, coordinate all policies and procedures related to Trust Management (not just BIA). Today there are pockets of policy development that are not coordinated and do not seek out one another to share lessons learned and prevent overlap.

2.1.3 Develop a team to support development of regulations, policies, and procedures for Trust Management

A permanent, full-time team will be responsible for writing the overarching Trust Management regulations, policies, and procedures for the Indian Trust organization. This team will also provide guidance to Program Offices writing trust-related policies and procedures. The capabilities of the team will need to include the ability to write, conduct research, interpret statute/policy, and analyze regulations. Within this team, establish process ownership to provide stewardship and accountability for policy and procedure development.

This team would continue to apply, as appropriate, industry standards such as those referred to in the 1990 Comptroller's Handbook for Fiduciary Activities (OCC, 1990).

2.2 Replace the Trust Policy Council



The Trust Policy Council that was named to be the governing body for policies and procedures has never met. The TMIP Steering Committee has served in this capacity in its absence. Through a permanent governing body, a system of checks and balances between the policy and procedure organization and the rest of the Bureau of Indian Trust Assets Management will ensure comprehensive, thorough Trust Management policies and procedures are implemented.

Observations and Findings

Priorities for the subproject are not always based on the most critical Trust reform needs (e.g., focusing on non-Trust moneys, outdated regulations). Also, these priorities do not correspond with the results of the survey conducted to determine Tribal and BIA priorities for Tier 2 (regulations to be written in FY 2002).[1]

There does not appear to be any measurement system to judge compliance with policies and procedures in any of the Trust Management organizations.

Detailed Recommendations

2.2.1 Utilize the proposed Trust Board in place of the Trust Policy Council

The Trust Board, in addition to their other duties, would have the responsibility of reviewing and commenting on regulations and policies and procedures along with ensuring compliance with OCC directives.

[1] Report to the Trust Policy Council, Review of Regulations and Program Guidance (BIA April 2001).

2.2.2 Establish an annual planning session

The planning session would be between the Director of Policy & Procedure and the Trust Board to develop priorities for the year. This annual session should be a facilitated off-site session to identify regulations that need to be reviewed or written and corresponding policies and procedures developed in the next fiscal year.

2.2.3 Establish a performance measurement system

Up-to-date policies and procedures need to be developed and communicated, but in addition, compliance to those policies and procedures must be monitored. To assist in measuring compliance, management reports will need to be generated and distributed to all managers who will be held accountable for those results. Developing an appropriate performance measurement system should be coordinated through the Performance Measures and Reporting Center described in Recommendation 4.3 in Section IV: Overall Trust Enterprise Analysis and Recommendations of this report. This will not be a small undertaking and will require performance management expertise outside of the subproject to accomplish.

2.3 Redesign Processes to Develop Policies and Procedures

There are multiple groups writing policies and procedures with respect to Trust Management, each using its own method with differing results. With one organization focused on developing policies and procedures, a consistent repeatable set of processes will expedite development and acceptance. EDS believes that these consistent processes could significantly improve the level of effort necessary for policies and procedures development.

Observations and Findings

Policy and procedure development is a long and complicated process. Currently, multiple groups within the Department are developing Trust related policies and procedures in isolation. Much work has been done in this area, but methods used to develop policies and procedures vary by organization. Some organizations are better at managing and keeping up with changes than others.

New laws are continually being passed which affect the Trust Management regulations as well as the supporting policies and procedures. There is no standard process in place across the Department to identify those new laws before passage, develop a plan to review and write policies for those new laws, receive comments and incorporate the revisions, and communicate the results to the organizations affected.

There also does not appear to be a standard process across the Department to update existing Trust related policies and procedures as needed.

Detailed Recommendations

2.3.1 Redesign policy and procedure development

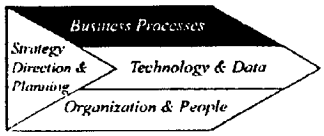
The redesign effort would cover not only the "how work is done", but also by whom and when. This could be one of the first tasks undertaken by the team (see Recommendation 2.1) working under the direction of the Director of Policy & Procedure. The redesign effort should be led by

someone experienced in process analysis and include subject matter experts from Trust related organizations.

According to leading practices, writing policies and procedures that are easily understood and applied involves analyzing, writing, publishing, training, communicating, measuring, auditing, and continuously improving business processes and published policies and procedures.[1]

"People must be involved in the analysis and research phases when business processes are being studied to be truly participative. People usually do not oppose the content of proposed change, but it is the method by which the policies and procedures are disseminated, that tends to upset them. There have been many great business processes, policies, and procedures that failed at the onset because of an inadequate or nonexistent early coordination and deployment process that is unplanned."[2] The redesign effort must include a transition plan that incorporates change management activities to ensure the new processes are understood, implemented and sustained over time.

2.4 Complete the Interagency Handbook



Since the inception of OST, roles and responsibilities between BIA and OST have not been clearly defined, causing conflict. These conflicts cause re-work which results in beneficiaries' not receiving timely payments.

Bridging the gap between the current BIA/OST organizations and the implementation of the Indian Trust would be facilitated by a written policy document such as the Interagency Handbook.

Observations and Findings

The concept of the Interagency Handbook is to clarify areas of interaction between BIA and OST. There are some individuals who feel that the handbook is too detailed, while others feel that it is not detailed enough. The purpose of the handbook was not to rewrite policies and procedures for each organization, but rather to focus on work areas that overlap between OTFM and BIA.

There are high expectations for the Interagency Handbook – but there are concerns over how long it is taking to develop and whether it will be as informative as hoped.

Detailed Recommendations

2.4.1 Provide interim procedures by completing the Interagency Handbook

Completing the Interagency Handbook will provide interim procedures to bridge the gap between the current BIA/OST organizations and the implementation of the Indian Trust organization. EDS recommends the effort on the handbook continue in order to provide these interim procedures while redesign efforts get underway. The handbook could provide a starting point for

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[1] Page, Stephen B., Achieving 100% Compliance of Policies and Procedures , (BookMasters, Inc. Mansfield, Oh.).

[2] Page, Stephen B.

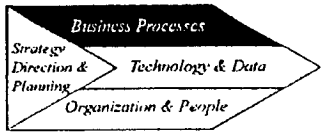
the redesign effort as it will outline high-level processes that will have to continue in order to process Trust funds.

DOI must implement the Interagency Handbook, but recognize that the Handbook will not be the "fix all" solution – more coordination efforts are needed that will be provided under Recommendation 2.3. Completion of the handbook should be escalated to the highest-levels for resolution to improve the timetable for implementation.

2.4.2 Accelerate the Handbook training

Change management strategies should be included in the Handbook's implementation to ensure acceptance and widespread use. Employees as well as managers should attend the training and be held accountable for compliance to the handbook. It is taking much too long to get the Handbook completed and implemented, the sign-off should happen as quickly as possible in order to get training underway.

2.5 Redesign Processes for Updating Policies and Procedures



It is difficult for the regions/field to assemble complete and up-to-date policies and procedures which results in their having to interpret them on their own, in their own way. Redesigning the communication process and removing old regulations will go a long way in helping everyone work from the "same page."

Observations and Findings

Memorandums are issued that are changes or addendums to policies and procedures, but the policies and procedures themselves are not updated. When updates are distributed, it is through multiple sources, including email. It is difficult for the regions/field to assemble complete and up-to-date policies and procedures, resulting in varying interpretations and compliance with the regulations in place. There have been attempts to post manuals and handbooks on web sites but this effort is not complete and the web sites are sometimes difficult to find.

There is inconsistency within OST with regards to what documentation is needed/required for processing Trust funds, causing frustration and iterations of rework.

Many old out-of-date regulations still remain as part of the 25 CFR (Code of Federal Regulations) causing widespread confusion. Agencies try to fulfill the requirements of the regulations to the best of their ability, but old regulations often contradict newer ones – and usually there is no direction provided on how to resolve these situations. The subproject has identified this area as a priority for 2002.

Detailed Recommendations

2.5.1 Develop a new process for communicating updated or new policies and procedures

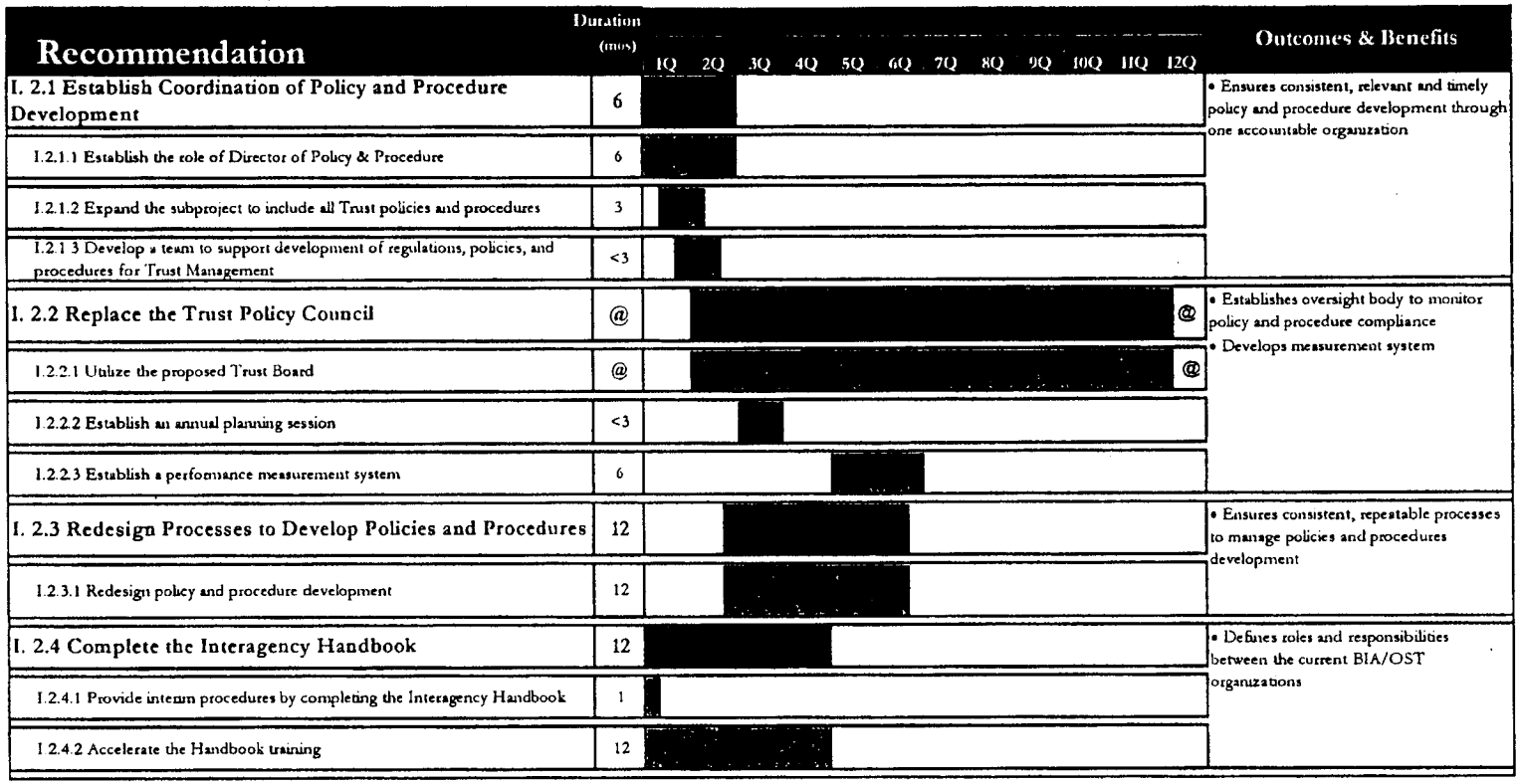
Streamlined communication processes are needed to ensure policy, procedure, as well as regulation changes are distributed quickly and efficiently to all Trust Management personnel. DOI should consider the use of alternative communication methods such as electronic communication and storage to communicate consistent, documented policies and procedures. The communication process should come under the auspices of the Trust Program Management Center.

2.5.2 Remove outdated regulations

Assign one of the policy and procedure team members (identified under Recommendation 2.1) the task of identifying and removing outdated regulations. Removing the old regulations would go a long way in simplifying compliance to the current regulations in effect. It would remove ambiguity now faced by the field as well as make documentation easier.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.



Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
I.2.5 Redesign Processes for Updating Policies and Procedures	@												@	• Creates consistent processes to communicate changes
I.2.5.1 Develop process for communicating updated or new policies and procedures	3													
I.2.5.2 Remove outdated regulations	@												@	

@ - Indicates ongoing efforts

J. HLIP 10: Training

1. Overview

1.1 Description

In the context of this Report, training refers to trust-related training for DOI Trust Management employees. This includes system as well as non-system (non-technical) Trust training. Training in this context does not refer to general skills training offered to all DOI employees.

The HLIP defines the Training Subproject as supporting "the system implementation and specialized skills training for the overall Trust reform effort." The objective of the Training Subproject, per the HLIP, is, "to increase DOI and Tribal Trust personnel job performance and inter-organizational effectiveness by providing quality, targeted training to the OST, BIA, Trust land asset management organizations, and Tribal representatives and members centering on TFAS and TAAMS system implementation training, as well as non-system function/task training."

In the HLIP, status and ongoing activities for system implementation training (including TAAMS and TFAS) as well as non-systems training is discussed. The HLIP also describes the extensive needs analysis conducted in 1997, and revalidated in 1999, by a professional training contractor. A series of 28 training courses was proposed in the analysis, and discussed in the HLIP as the minimum number of courses that would be provided to OST, BIA, MMS, BLM, OHA, and Tribal employees performing Trust responsibilities. A training plan based on these studies was developed in 1999, with an expected three-year timetable for completing the series.

1.2 Current State

The HLIP definition and scope of the Training Subproject differs from the direction of the current subproject leadership. Despite the needs analysis and the proposed training curriculum and plan, the subproject's effort has been scaled back to include one non-systems training course – *Trust Foundations, an Introduction to Trust Reform and Change.* This is a three-day course combining the initial Trust Foundations 1 and 2 courses intended to provide Trust Management personnel with an increased understanding of the Department's fiduciary role. This was the only course implemented from the 1999 contractor-training plan. Other trust-related training courses exist and have been conducted (e.g., Probate) – but are developed independently of the subproject. This makes it difficult to identify and manage all trust-related training courses that are available to DOI Trust employees.

The Trust Foundations 1 course has been delivered to approximately 1,500 employees, half of the identified Trust Management employees. The remaining 1,500 employees will be required to take the new, three day Trust Foundations course that is a combination of courses 1 and 2. The first offering of the new course is in January 2002. A one-day course encompassing the original Trust Foundations 2 course will be offered to the 1,500 people who originally took Trust Foundations 1.

Initial system training for TFAS has been completed and TAAMS training is under development; however, system training such as these are not coordinated or monitored by the Training Subproject. System training is viewed as the responsibility of the system subproject (e.g., TAAMS).

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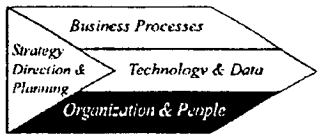
1.3 Recommendation Summary

EDS recommends that DOI designate one training organization responsible for the coordination of all trust-related training, system and non-system, and develop a school of Trust Management through which trust-related training will be delivered. This will require a renewed focus and priority set on training and a corresponding increase in the training budget. A renewed focus on training is critical to achieving Trust reform objectives. Trust staff are often recruited with little to no experience in the Trust Management functions they will support, and then are required to conduct complex transactions. Job specific training today is done primarily on-the-job, and this is not sufficient nor does it ensure consistent practices across DOI. By having one organization working with Trust Management leaders to develop the Trust Management curriculum, training will be coordinated, maximizing training resources as well as time spent in the classroom. The end result will be consistent learning across the organization, less local pressure to "find" classes as well as the finances to fund attendance, and a better prepared and educated Trust Management staff.

2. Analysis and Recommendations

2.1 Expand Training Scope to Include all Trust Related Training



The Training Subproject as it exists today is responsible only for the development and delivery of the Trust Foundations course(s). As a result, there is no organization monitoring all of the trust-related training (such as Probate, TAAMS, etc.) throughout the Department, or making recommendations for other courses that are needed. EDS recommends that the scope of the Training Subproject be expanded to include all Trust related training and that it becomes a part of the new Indian Trust organization.

Observations and Findings

The Training Subproject leadership describes their niche as non-systems training. At the moment, this encompasses a single course, *Trust Foundations, an Introduction to Trust Reform and Change*. Other training courses will be considered once the first round of the Trust Foundations course has been completed (i.e., when most of the 3,000 Trust employees have taken the course). The subproject estimates it will be about a year before all 3,000 employees have completed the course. As a result of this sole focus on the Trust Foundations course, there is not a central, designated training group or facility coordinating trust-related training. In addition, there is no comprehensive Trust Management training plan in place. Other areas within the Department that have either held or are planning Trust training, have not coordinated with the subproject. For example:

- The Social Services and Housing Office sponsored four discussion forums for social services specialists across the country to communicate how the new 2001 Regulations translated into new work procedures. These forums were not referred to as "training" sessions; however, they did provide guidance to social services in how work procedures needed to change. Social Services supervise the Trust accounts of minors as well as adults with legal disabilities or who are otherwise in need of assistance. Therefore, their activities are very much related to Trust Reform.

- Probate training on the new regulations was conducted in 2000 and 2001 by the Probate subproject for the Probate staff. Although the budget source for the training was, according to the training coordinator, the Training Subproject, the Training Subproject could not give EDS an update of Probate training activities.

- Indian Land Consolidation Act training sponsored by the Western Regional Office this year was developed independent of the Training subproject.

Finally, the team developing the Interagency Handbook (which is nearing completion) has discussed training strategies and possible delivery methods, but no coordination with the Training Subproject is planned at this time.

An external, privately run training source used by some DOI Trust Management employees is the Cannon Trust School. Training programs offered by the Cannon Trust School are not coordinated or communicated through the Training subproject, but are attended by DOI employees. The Cannon Trust School is run through the Cannon Financial Institute in Athens, Georgia. The school offers three Trust programs to public and private organizations: Trust I, Trust II, and Trust III. Each school contains eight to 13 courses equaling 38 classroom hours per school. Classes are offered at six locations across the country, including the University of North Carolina, University of Notre Dame, and Northwestern University. Classes are not specifically tailored for DOI, but provide participants with knowledge of Trust industry standards and practices. According to the Cannon Financial Institute, ninety-four percent of the top-100 Trust firms send employees to Cannon Schools.

The lack of coordination and communication of Trust training creates some confusion. In some cases, employees have inadvertently attended the Probate training course twice. Superintendents are not always informed who is attending what training, when. Also as a result, employee development cannot be managed, as there is no overall training program that Trust employees follow.

The Trust training environment within DOI is very complex. Regional offices and agencies are geographically dispersed and are often located in remote areas, making travel to training classes expensive and time-consuming. Skill levels vary tremendously among staff – so determining the appropriate pace and technical level for a course can be difficult.

Detailed Recommendations

2.1.1 Put into place a single organization and leader to support Trust Management training and workforce planning

EDS recommends that DOI establish a single organization to develop, coordinate, and lead Trust Management training and workforce planning efforts. Putting both disciplines under one leader will allow coordination and integration between the two subprojects. Trust-related training refers to non-system and system, as well as technical (functional) training. This organization must be integrated into the operational framework of the Trust organization, and should permanently reside in the proposed Indian Trust and will be called Workforce Management and Training. Trust training should not be considered a project or a subproject, but a permanent entity (or team) within the Workforce Management and Training organization. Staff making up the Trust training team should not have other job responsibilities—their full-time positions would be to support the Workforce Management and Training organization.

While all Trust training must be coordinated through this new Trust training team, EDS is not recommending the development of a new training center. The training team would be responsible for defining Trust training needs and assisting in developing the curriculum; however, Trust training would be delivered through the already existing DOI University and four learning centers across the country.

The new training team would consult with the proposed Trust Board of Advisors, as well as other Trust Management leaders to develop the Trust training curriculum and annual training plan. Per recent OPM guidelines[1], training strategies should tie directly to an organization's strategic plans – therefore, in the case of DOI, supporting the mission and goals of the Indian Trust organization. In developing the training plan, the team should begin by reviewing strategic plans of the new organization, followed by a review of the 1997 and 1999 training needs analyses, as well as the 1999 Training Plan Approach document. These documents were prepared for the Training subproject by the training contractor with Trust Management training as the scope.

System training courses, such as TAAMS, would still be designed by the system subproject. However, the new Trust training team would be involved in the training development to provide a consistent look, feel, approach, and ultimate success rate of system training provided to Trust employees. Once the system is implemented and considered in the "operations and maintenance" lifecycle phase, the training would be turned over to the school of Trust Management (see below) for coordination and delivery.

2.1.2 Create a school of Trust Management

EDS recommends creating a school of Trust Management within DOI University to deliver Trust training. The school's courses would be offered primarily through DOI University, at the four learning centers located in Albuquerque, Denver, Anchorage, and Washington, DC. As necessary, courses could be offered on-site at field offices or at local universities. Specialized courses could be offered outside of DOI University as required, such as initial training for systems such as TAAMS. Oversight of training within and outside of the University would be provided through the new training team. DOI University staff would be responsible for contracting and coordinating with appropriate vendors to deliver the training, and would also function as the schedulers of the training, track training attendance, and monitor participant feedback of those classes.

As part of the school of Trust Management, certification and re-certification programs need to be established. These would create enthusiasm for training courses as well as pride in completion of a series. This would also help to better monitor employee skills development.

2.1.3 Adopt more e-learning training methods

Due to varying employee skill levels and the geographically diverse nature of the Department, EDS recommends using more non-traditional, e-learning training methods in delivering Trust training, such as self-paced training materials (CD-ROM or web-based) or distance learning. E-learning has become increasingly successful in government. According to Federal Computer Week, "The government, with its geographically dispersed work force and its infinite policy and

[1] Office of Personnel Management, Office of Workforce Relations, "A Guide to Strategically Planning Training and Measuring Results," July 2000.

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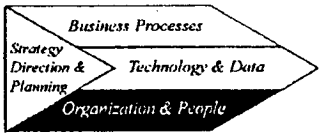
procedural training requirements, has enthusiastically embraced computer-based training."[1] For example, the IRS has set up an on-line university aimed towards giving employees the skills necessary to support the agency's modernization program. Employees can earn college credits and are able to take classes from their work location, at their own pace, when it is convenient for them. Historically the IRS spent 78% of its $100 million annual training budget on travel expenses – a significant portion of these funds are now available for developing and offering additional courses.[2]

2.2 Reassess Training Budget Requirements



To be successful, the Indian Trust team will require sufficient funding for the school of Trust Management. Once a baseline Trust Management curriculum is developed, a proposed, annual budget can be estimated for this effort. To make an impact, the budget will need to be significantly greater than overall training spending today in Trust Management organizations.

Observations and Findings

Consistently, interviewees told EDS that there is not enough money for training, not enough trainers, and a lack of a consistent approach to Trust training throughout the Department. They saw this as a significant barrier to having adequate staff in their offices. Cutbacks from the mid-90s have severely hampered the ability of regions and agencies to provide training to their staff. EDS was told BIA is the only Bureau without a training facility or organization – and the majority of Trust Management employees currently work for BIA. Field staff interviewed had very minimal funding available for training, if any. Most indicated they did not have a budget line item for training. As very little job-specific training is provided centrally, almost all training today is done on-the-job, one-on-one. Some interviewees were hesitant to criticize any Department training that is offered – because any training was better than none.

Compounding the lack of training available, qualified applicants have very little real working knowledge of the trust-related functions they will be supporting. For example, one agency reported that qualified candidates for realty positions typically do not know how to read a land description or other complicated oil and gas documentation. A class in this area would be appropriate. The same agency indicated that few people are interested in Trust positions, resulting in low application rates. The agency is often forced to hire candidates with little experience, but who meet the minimum qualifications. As a result, extensive training is required, but is done on-the-job.

Detailed Recommendations

2.2.1 Develop a Trust Management training curriculum that is adequately funded

To be successful in reaching Trust Reform goals, objectives, and court requirements, an investment in training is critical. The DOI is not alone in having scaled back training and employee development expenditures. According to Government Executive Magazine, "Federal agencies could only downsize so much, take on so many new responsibilities, slow recruiting to a

[1] Hasson, Judy, "IRS embraces e-learning," Federal Computer Week, September 10, 2001.

[2] Hasson, Judy.

virtual standstill and pare training resources to the bone before the civil service would experience what many consider a crisis."[1] To support the recommendation of the new Trust training team and the DOI University school of Trust Management, an adequate training budget for Trust training must be budgeted annually by the Indian Trust organization. By centrally funding a school of Trust Management, decisions about training expenditures will not need to be made at the local level. Training can be funded and managed through the Indian Trust organization – therefore ensuring that across the Department, Trust employees receive the training they need to perform their duties and fiduciary responsibilities.

2.3 Redesign DOI Trust Foundations Training

EDS recommends another review of the Training subproject's course, *Trust Foundations, An Introduction to Reform and Change*. Satisfaction with the Trust Foundations 1 and 2 courses was low among regional and field office attendees and there is a feeling that the course does not maximize classroom time. A major revamp in the design, content, and approach to educating staff on Trust Principles is needed. In addition, more advanced Trust Foundations courses need to be developed.

Observations and Findings

The majority of the training participants interviewed did not find added value in the Trust Foundations class. According to exit surveys conducted by the training contractor, the negative reports about the class come mainly from upper management, and the positives come from the less experienced training participants.

The approach taken in Trust Foundations 1 and 2 is, according to the Training Subproject management, a bottom-up approach to changing culture. They believe that by changing thinking at the lower levels, the subproject could help to "infect the organization" with new ways of thinking. However, most culture change experts agree that to change the culture, the opposite must occur – change must come from the top of the organization and work its way down. Upper management does not currently support this class.

The Trust Foundations class has recently been revised and renamed from Trust Foundations 1 and 2 to *Trust Foundations, An Introduction to Reform and Change*. The class is now a three-day class whereas previously it was two separate courses. As the new title indicates, the Trust Foundations class is an introductory class. The class covers only the basics of Trust work, and no intermediate or advanced training courses are available.

While the class does cover Trust Management-related material, much of the training is focused on building organizational Trust vs. educating on specific Trust Management policies, procedures, and legislation. Team building and the 5-Cs is a theme throughout the class: communication, cooperation, collaboration, consultation, and conflict resolution. Trust Principles for Trust Management improvement are identified in the class as: unity, harmony, trustworthiness, dignity/respect, fairness, and service. These are very different from the eight Trust principles identified in Secretary Babbitt's Order No. 3215, dated April 28, 2000, "Principles for the Discharge of the Secretary's Trust Responsibility" as outlined below:

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[1] Figura, Susannah Zak, "Fighting for Talent," Government Executive Magazine, April 1, 2001.

The Secretary's proper discharge of the Trust responsibilities of the United States shall include (but are not limited to) the following:

1) Providing adequate systems for accounting for and reporting Trust fund balances.

2) Providing adequate controls over receipts and disbursements.

3) Providing periodic, timely reconciliations to assure the accuracy of accounts.

4) Determining accurate cash balances.

5) Preparing and supplying account holders with periodic statements of their account performance and with balances of their account which shall be available on a daily basis.

6) Establishing consistent, written policies and procedures for Trust fund management and accounting.

7) Providing adequate staffing, supervision, and training for Trust fund management and accounting.

8) Appropriately managing the natural resources located within the boundaries of Indian reservations and Trust lands.

Finally, training participants felt the contractors were unfamiliar with basic Trust Management processes, procedures, and regulations. Training participants have questioned and challenged the accuracy of the Trust Foundations training content and have not seen changes made based on their feedback.

Detailed Recommendations

2.3.1 Revamp content, design, and approach for Trust Foundations, An Introduction to Reform and Change

The Trust Management introduction course should be strictly focused on Trust Management, and use the Secretary's Trust Principles as the basis for the class. EDS recommends redesigning the course to be less focused on team building and organizational trust, and more focused on Trust Management. Regional and agency subject matter experts should be heavily involved in the content development and should be available during the class to answer more technical questions. The Trust Foundations course has been recently revised, the first offering of the new course will be in January 2002. EDS has not yet received a copy of the new course materials; however, it does not appear that a major revamp of the course approach and content has occurred. If the new training organization sees team building as an Indian Trust organizational need, this could be offered as part of the school of Trust Management – however, it should be called Organizational Team Building.

2.3.2 Develop advanced Trust Management courses

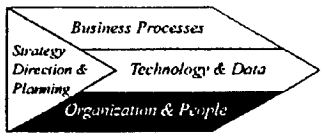
More than one Trust Management class is needed. Entry-level employees or those with one year or less experience have found the Trust Foundations class to be very helpful -- a class with this audience in mind should remain part of the school of Trust Management. However, more

advanced classes are also needed to continue to develop more experienced employees and supervisors.

2.3.3 Adequately prepare the trainers

Trainers need to be well coached and educated prior to delivering any training that is part of the School of Trust Management. This was not evident in the initial Trust Foundations courses. Contractors will not succeed if Department subject matter experts are not involved with course content and do not spend adequate time with the trainers to bring them up to speed on the Department's environment and culture, as well as the Indian Trust organization's mission, goals, and fiduciary responsibilities.

2.4 Provide Business Process Support and Training



Business process training and support is critical to successful large-scale system implementations. Training and supporting the technical requirements and processes of a new system are important, but without the business process context, users will be lost when they are asked to begin integrating the new system into their work procedures.

Observations and Findings

Trust Management system training does not consistently incorporate DOI business processes into the classroom. TFAS training and manuals, while successful, included only the system functionality. TAAMS training is also planned to be software-focused–role-play exercises or business cases are not planned for the classes that will be resuming in 2002. However, two types of guides are being developed for TAAMS. "Discipline" guides are being developed by the system design team that incorporate system functionality along with business processes. These guides are excellent and are being written by Department subject matter experts in each of the functional areas of TAAMS. However, the extent to which the business process information from the guides will be incorporated into the training is questionable. The training contractor is developing another set of user manuals (for the Title module only) that are traditional guides indicating how to maneuver through the system.

According to one field office interviewee, the classroom training typically conducted by the Department for new system implementations "doesn't work." The interviewee felt that with TAAMS, the discipline guides would make the difference. Based on the complexity of TAAMS, and previous experience with enterprise system deployments, EDS does not believe the guides will be enough. A recent article in CIO Magazine fully supports the necessity for business process training, stating, "Increasingly, experts reckon that they've found the smoking gun: poor training. Not the technical training of the core team of people who are installing the software, but the education of the broad user community of managers and employees who are supposed to actually run the business with it." The article later went on to say, "But the consensus that's emerging is that the training that matters isn't techy, 'this field shows this; this button does that' training. In fact, what we normally call training is increasingly being shown to be relatively worthless. What's called for, it seems, is an ability to figure out the underlying flow of information through the business itself. The traditional view of training may blind the unwary to

its significance and to the tightly woven links that exist between training, change management and staff adequacy."[1]

Detailed Recommendations

2.4.1 Incorporate business process exercises into TAAMS classroom training

Failing to incorporate business processes into TAAMS training could be a disaster. The TAAMS discipline guides will be very helpful, but cannot take the place of instruction and practice as to how the system and work procedures come together. TAAMS has been described as the centerpiece or backbone of Trust Reform. If the users are not adequately prepared to use the system, they will not embrace it or fully take advantage of the opportunities for improvement that it provides.

2.4.2 Educate trainers on business processes and work procedures

In order to incorporate business processes into the training, system trainers need to be educated on the work procedures related to the system they are training. This takes time both on the part of the contractor and on the Department. To help bridge the time it will take for trainers to fully understand business practices, business process subject matter experts should attend the training. These experts should understand both the processes and the associated system functionality. There are plans in place for the discipline guide writers to assist in the early TAAMS training classes – this is an excellent idea and should be encouraged across all systems.

2.4.3 Provide on-site business process support at regional offices and agencies

On-site business process support may be necessary in the first week or two of TAAMS "go-live." Depending upon the complexities of the location, system and process experts may be required to assist the regional office/agency integrate TAAMS into their work procedures. While this can be an upfront cost to the Department, the long-term savings will more than compensate. As an example, when the U.S. Immigration and Naturalization Service implemented a new enterprise system for processing and tracking applications for Naturalization, a set of new business procedures was introduced. On-site technical and change management/business process support was provided to all 85 locations implementing the new system. This included remote locations such as Alaska, Puerto Rico, the Virgin Islands, and Hawaii. The system is up and running successfully at all locations today.

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[1] Wheatley, Malcolm. "ERP Training Stinks," CIO Magazine, June 1, 2000.

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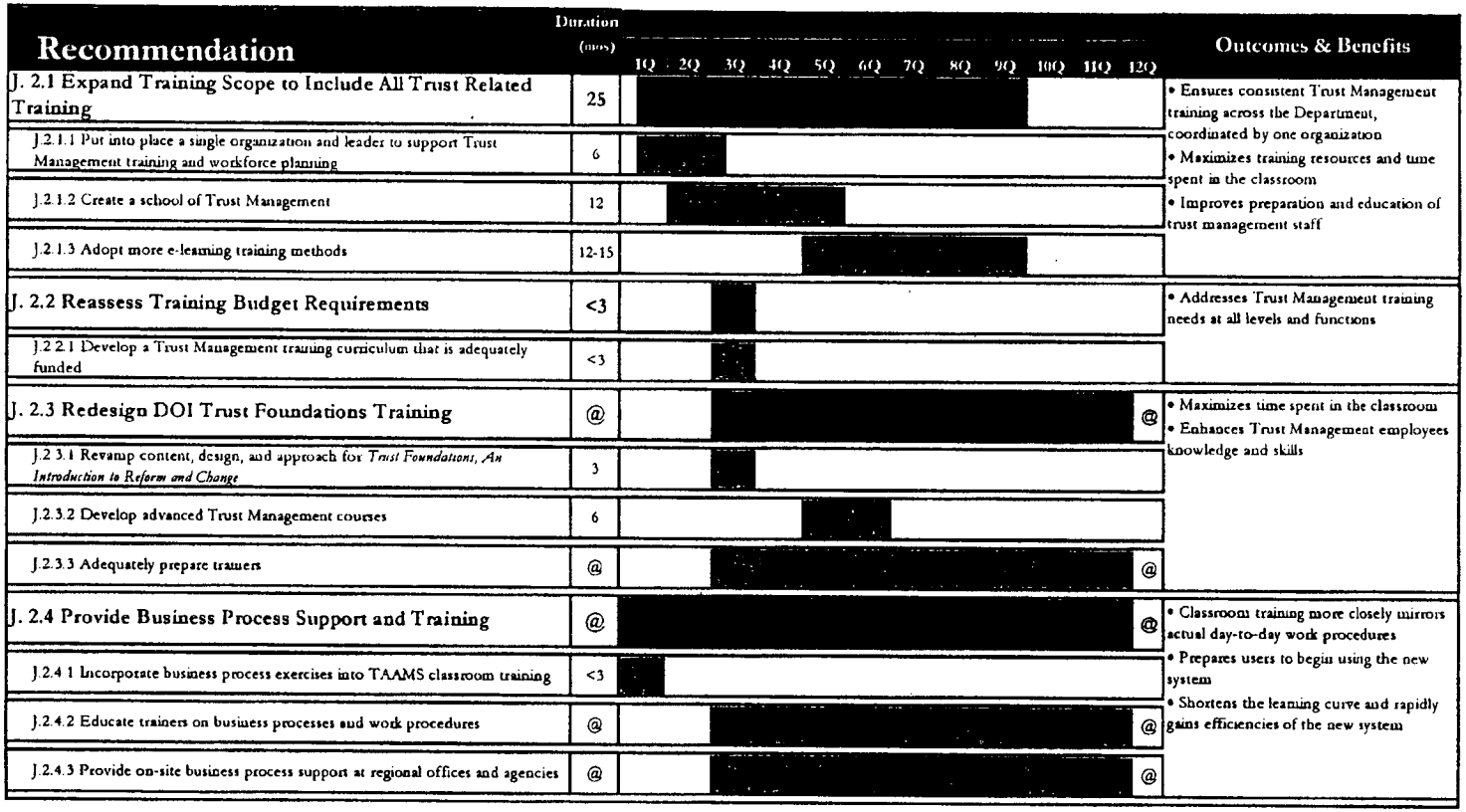
3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.



@ - Indicates ongoing efforts

K. HLIP 11: Internal Controls

1. Overview

1.1 Description

Internal control is a major part of managing an organization. It comprises the plans, methods and procedures used to meet missions, goals and objectives and, in doing so, supports the performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud. In short, internal control, which is synonymous with management control, helps government program managers achieve desired results through effective stewardship of public resources.

As defined by GAO in its "Standards for Internal Control in the Federal Government" published in November of 1999, internal control is "An integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved:

- Effectiveness and efficiency of operations
- Reliability of financial reporting, and
- Compliance with applicable laws and regulations."

As described in the HLIP, "For decades, Tribes and individual Indians have voiced concerns over the Department's management and accountability for their Trust funds and the overall management of natural resources. Reviews conducted over the past 15 years by the GAO, the DOI's Inspector General, and independent accounting firms have confirmed the Indians' concerns and identified serious financial management and internal control problems permeating every aspect of the Trust Management spectrum. These audit and external oversight findings and recommendations have focused on serious internal control problems and variances in the program operations ranging from a lack of standardized policies, practices and procedures to the inability to confirm cash balances, major inadequacies in accounting records and related systems, lack of segregation of duties and deficiencies in field operation and management areas including collections and disbursements of Indian Trust funds.

"Areas of concern in Internal Controls include (but are not limited to) the following issues:

- Reconciliation of account balances with U.S. Treasury
- Investment practices
- Inconsistency in applying accounting policies and procedures - Lack of written policies/procedures
- Segregation of duties
- Understaffed operations (accounting, BIA realty/LTRO offices)
- Lack of adequate training
- Lack of BIA Agency/Area controls in Special Deposit account management
- Lack of timely updating of land ownership records - backlogs
- Lack of an accounts receivable system
- Systems controls/security controls are inadequate
- Trust fund accounts maintained without social security numbers, or categorized as "whereabouts unknown"

- Lack of disbursement policies and procedures/coordination at field operation level
- Collection functions lack policies and procedures; adequate oversight/administrative review, separation of duties
- Lack of reconciliation of daily deposits
- Cash management
- Lack of reconciliation with U.S. Treasury suspense and budget clearing accounts
- Missing records-inconsistent BIA records management practices
- Verifications of oil and gas royalty collection data
- Lack of data processing controls
- Inconsistent and insufficient Indian Irrigation project payment management
- Inconsistencies in Judgment Fund distributions and management

"The objectives of the Internal Controls Subproject are twofold. First, to systematically address current and historically documented internal control issues to ensure the resolution of cited deficiencies across the entire Trust Management spectrum within the Department. Second, to design and implement a comprehensive Trust Risk Management Program to monitor and evaluate the effectiveness of Trust operations across the Department.

"The implementation of actions specified under the other ten HLIP subprojects is expected to successfully resolve identified internal control problems and improve DOI Trust Management."[1]

1.2 Current State

As noted above, the HLIP identifies two key objectives for the Internal Controls Subproject - systematically resolving internal control deficiencies, and designing and implementing an overall Risk Management Program. While progress has been made in meeting HLIP milestones, analysis indicates that substantial work remains to meet the subproject's objectives. Efforts to meet the second objective have been substantial. However, internal control deficiencies remain, in some cases years after being identified in audit reports. The Risk Management Program objective has been the primary focus of the subproject. Due to resource shortages, OTRM decided to concentrate most of its efforts on Risk Management development and implementation leaving the correction/resolution of control deficiencies to the successful completion of other Trust reform efforts already underway. The effort to meet this objective is progressing, but full implementation of the program is still years away.

The HLIP Action Plan identifies a series of tasks designed to meet the Internal Controls objective. These tasks include:

- Develop Inventory of all Documented Internal Control Weaknesses (Task A)
- Catalog relevant audit findings and recommendations (Task B)
- Research and select template for risk management program (Task C)
- Identify and develop remediation for acute internal control weaknesses (Task D)
- Develop organization and staffing for Trust risk management office (Task E)
- Map weaknesses to current improvement efforts (Task F)
- Analyze weaknesses to determine current status (Task G)

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[1] United States Department of the Interior, *High Level Implementation Plan (Revised and Updated February 29, 2000), 123-124*

- Modify Treadway approach to DOI situation and develop monitoring procedures (Task H)
- Inventory and catalog internal controls in TFAS, TAAMS, and MMS systems (Task I)
- Develop risk management program final draft (Task J)
- Coordinate with affected bureaus and offices to develop remedial actions (Task K)
- Coordinate risk management program with revised Trust policies and procedures (Task L)
- Publish final risk management program (Task M)

Tasks A, B, D, F, G, and I are most closely aligned with achieving the requirements of the first objective addressed in HLIP—systematically addressing internal control issues. Documentation has been provided to the EDS team, which supports the completion of tasks A, B, D, G, and I. With regard to Task D, HLIP requires that an action plan be put in place outlining remediation for acute internal control weaknesses identified through an external audit. As noted, this action plan has been completed. However, the plan is only the first step in the remediation effort.

Documentation has been provided to support the partial completion of Task F - mapping weaknesses to current improvement efforts. The EDS team was provided with a document that matched existing deficiencies to HLIP subprojects expected to resolve the deficiency. However, under Task F, the HLIP indicates that subprojects will be reviewed to ensure that they are "adequately addressing the remedial actions necessary to address the reported problems."[1] HLIP also indicates that "Additional review will be performed and coordination with subproject teams and program managers where necessary will be completed to ensure that actions planned are sufficient to resolve all past deficiencies."[2]

In interviews with staff from the OTRM, the EDS team was told that as a result of resource shortages, OTRM has decided to concentrate most of its efforts on development of the Risk Management program. The resolution of control deficiencies is being left to the successful completion of other Trust Reform efforts. The OTRM staff indicated significant internal control deficiencies continue because some of these other Trust Reform projects are lagging behind schedule.

OTRM staff also indicated that they are attempting to address critical internal control problems that require fast track resolution. They cited efforts related to Cash Management and Cadastral Surveys as two key areas where they are currently working toward resolution. However, they again stated that it is the opinion of OTRM that the main focus should remain on identifying and resolving internal control problems through implementation of the Risk Management Program.

The primary focus of the Internal Controls Subproject has been on the response to the Risk Management objective. HLIP identifies a number of specific tasks associated with this objective including:

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[1] United States Department of the Interior, *High Level Implementation Plan (Revised and Updated February 29, 2000), 126*

[2] United States Department of the Interior, *High Level Implementation Plan (Revised and Updated February 29, 2000), 127*

- Researching and selecting a template for risk management program development (Task C)
- Developing organization and staffing for a Trust risk management office (Task E)
- Modifying the Treadway approach to DOI purposes (Task H)
- Developing a risk management program final draft (Task J)
- Coordinating the risk management program with revised Trust policies and procedures (Task L)
- Publishing a final risk management program (Task M)
- Establishing a continuing risk management presence (Task N).

The subproject has made steady progress toward accomplishing the first piece of this objective—designing an overall risk management program. However, implementation of the program has not progressed significantly and is likely to take a substantial amount of time to rollout. The program as envisioned is extensive, requiring a substantial investment in time and resources to train affected staff and build necessary risk management plans at over 200 field locations. Those locations are predominantly within the BIA, BLM, MMS, and OST.

Reviewing progress against the HLIP tasks indicates that five of the tasks have been completed (Tasks C, E, H, J and M). The Office of Trust Risk Management (OTRM) has selected the template that forms the basis of the risk management program. The OTRM has been established and a staffing plan has been developed. The OTRM is not yet at its planned staff complement, but hiring is underway. OTRM has completed the modification of the Treadway approach to meet DOI purposes and has issued two volumes representing the final risk management program.

Analysis of the current state reveals that two of the HLIP tasks have not been fully addressed. Task L, coordination with overall Trust policies and procedures, appears to have been accorded limited effort to date. Interviews revealed that the interaction between those responsible for policy and the OTRM has been limited, but renewed efforts have been undertaken in the past several months to increase inter-project coordination and communication.

Task N represents the most far reaching of the HLIP tasks for Internal Controls. This task is currently ongoing. The other tasks focus on the preparation for issuing the Risk Management program. This task focuses on the implementation phase for the program. Currently, OTRM is conducting an assessment of the state of internal controls for approximately 150 of the field offices. This effort was originally planned for completion by the end of the calendar year 2001. After the assessment has been completed, OTRM will embark on the process of training appropriate staff in the field offices and assisting in developing individual risk management plans. At present, OTRM estimates that the rollout effort will require four to five years to complete.

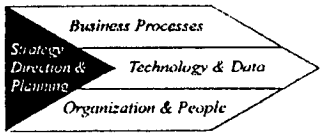
In addressing the progress against Task N, OTRM staff indicated during interviews that 55 field surveys of the approximately 150 priority locations have been completed. In these field surveys, no effective internal control programs were identified. During the interviews, OTRM staff also indicated that they are taking steps to accelerate implementation of the Risk Management Program. A pilot project has been initiated for a BIA field activity that operated many of the major Trust Asset Management Programs. The pilot will include the development of Risk Management Programs for all Trust asset management activities operating in the region. Once developed, OTRM will use the lessons learned from the pilot to create plans for similar programs across the country, thereby reducing anticipated implementation timeframes.

1.3 Recommendation Summary

DOI should undertake an extensive redesign effort to address a gap between the anticipated Risk Management Program and the current state. Due to the expected length of time for implementation of the full Risk Management Program, existing deficiencies will not be addressed in a timely manner. This recommendation is designed to "jumpstart" the Risk Management Program. The OTRM, should likewise continue to deploy the Risk Management Program with an accelerated implementation schedule. Through the acceleration, OTRM can put into place some preventative measures for internal control issues.

2. Analysis and Recommendations

2.1 Continue and Accelerate Current Risk Management Program



EDS recommends continuation of the current Risk Management Program. This program will act as a preventative method for managing internal control issues in the future. The Risk Management Program is designed to train and assist managers within DOI in preparing their Risk Management Plans and continuing to watch their internal control issues. The Risk Management Program will roll out a standard prevention program to all field offices within DOI that participate in Trust work.

Observations and Findings

The Internal Controls Subproject has concentrated its efforts on creating a Risk Management program to be implemented throughout DOI. This program, while necessary for future controls, has overshadowed continuing needs of immediate internal control issues.

The Risk Management program schedule is on a five-year rollout plan.

A lack of sufficient internal controls programs has been found by the OTRM in the field offices of DOI. The Risk Management program has been initiated in order to assist the field operations in establishing proper control programs at the local level.

Budget constraints are hampering the rollout of the risk management program.

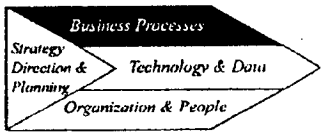
2.1.1 Accelerate implementation schedule for Risk Management Program

The Risk Management Program needs to be rolled out and implemented as quickly as possible. The current plan of a five-year rollout will cause a large time gap in affecting internal control fixes at the local level of most field offices. Standardization and implementation of controls needs to occur immediately. Internal control issues are extremely important in meeting DOI's fiduciary responsibilities. The Risk Management program is the key to OTRM's plan for institutionalizing internal controls into the every day management of Trust operations. Until all sites have created risk plans and implemented regular internal controls into their management of Trust operations, internal control deficiencies will continue to exist, if not increase in severity.

2.1.2 Adequately staff and fund OTRM

To handle the rollout of the Risk Management program, including training and risk evaluations, OTRM will need adequate staff. Internal controls issues exist in the current state of Trust operations that need to be immediately attended. At the same time, progress needs to continue in implementing a risk program. Given the complicated environment of DOI and its geographically dispersed field offices, adequate resources (funding and people) need to be allocated to strike a balance in the implementation of the Internal Controls Subproject. Adequate resources will allow OTRM to continue implementing its prevention program (Risk Management) while at the same time allocating some staff to pay immediate attention to resolving some of the highest priority internal control issues.

2.2 Initiate Process and Procedure Redesign Project for Internal Controls



OTRM should immediately initiate an extensive redesign effort aimed at identifying and addressing high priority internal control deficiencies. The effort should focus on issues identified through audits, as well as issues that have been identified during the Trust reform process. Rather than address individual deficiencies at the field office level, the redesign should focus on identifying root causes and developing cross-organization process solutions.

This recommendation will address a significant gap in the current HLIP Internal Controls Subproject. As noted above, implementation of the risk management program will take a substantial amount of time. This recommendation will fill the gap between the current situation and the point in the future where the Risk Management program begins to pay dividends. The effort will also begin the process of moving the organization from its current state to the desired objectives of the Risk Management program.

Observations and Findings

Substantial progress has been made in developing the Risk Management program. However, it is unlikely that significant benefits from the program will begin to accrue in the immediate future due to the changes necessary to fully implement the program. It has been estimated that the implementation schedule will span 4-5 years.

OTRM is in the process of hiring staff and utilizing internal government resources to implement the Risk Management program. At present, OTRM can draw on about 25 FTE to support program implementation. This number is expected to grow to approximately 65 FTE in FY 2002. Despite this substantial growth, all resources will be focused on Risk Management Program implementation.

There was emphasis on formulating Risk Management plans at the field offices. These plans, in turn, would begin the process of resolving internal control issues. OTRM sees itself as producing guidelines but taking little responsibility for correcting identified internal control issues. In addition to the likely time delays described above, this approach results in point solutions that are not leveraged across the organization, may not address root causes and result in inconsistencies in approach.

There is limited interaction among the various subprojects, yet the Internal Controls Subproject assumes that many deficiencies will be corrected by the activities addressed in other areas of the

HLIP. This approach runs the risk of leaving gaps in the effort to resolve the full range of internal control problems.

Detailed Recommendations

2.2.1 Prioritize deficiencies for redesign purposes

To implement the redesign recommendation, OTRM should begin by establishing a set of criteria to prioritize and categorize deficiencies. Prioritizing will allow OTRM to utilize its limited resources to focus on internal control concerns in the most effective manner. Various criteria can be developed for the prioritization process such as:

- Address deficiencies that affect the largest dollar volume accounts.
- Resolve deficiencies that affect the most field offices.
- Correct deficiencies that have the greatest potential for affecting data quality in supporting systems.
- Initiate work on deficiencies that offer the greatest return in the shortest possible time.

One of the advantages of the prioritization process is the identification of short term or quick fixes that can be addressed immediately while the larger redesign effort and Risk Management Program implementation continue. Developing priorities should be one of the first activities under this recommendation.

2.2.2 Categorize internal control issues

Categorization of the internal control issues would allow those responsible for the redesign to address groups of problems at once. The method chosen to categorize issues can vary. Internal control issues can be grouped as parts of a single process or may be addressed as similar problems occurring at multiple locations.

2.2.3 Increase subproject coordination

Increased coordination with other subprojects is a critical aspect of this recommendation. Without this coordination, the effort runs the risk of missing key elements of the internal control problem, duplicating efforts that are underway in other projects or, in extreme cases, developing solutions that are inconsistent with other subproject solutions.

2.2.4 Involve field staff in redesign efforts

As OTRM conducts redesign activities, field staff should be directly involved in working toward a solution. This approach will utilize the expertise of those closest to the issue. It also serves to begin the process of organizational change that will be critical in achieving acceptance of the overall Risk Management Program.

2.2.5 Develop clear project objectives

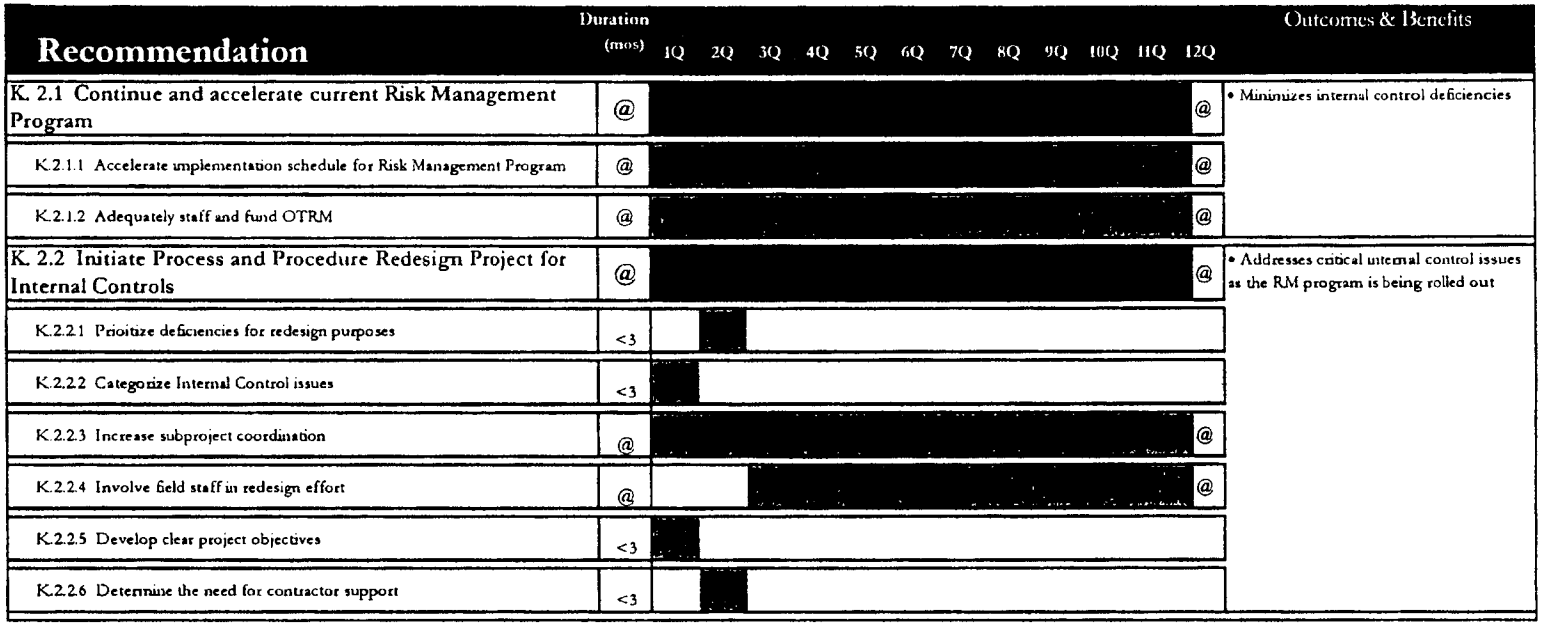
The redesign activities should be supported by project management plans that clearly state objectives, identify critical success factors, establish communications avenues, provide meaningful milestones and identify roles and responsibilities.

2.2.6 Determine the need for contractor support

OTRM should weigh priorities against resource availability to determine the need for contractor support. The current staff plan for OTRM is designed to support the long-term rollout of the Risk Management program. This plan can be modified to shift resources to the redesign effort and delay Risk Management rollout. In the alternative, the rollout plan can be retained and the redesign effort supplemented with outside contractor staff.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.



@ - Indicates ongoing efforts

L. Cadastral Survey

1. Overview

1.1 Description

A cadastral survey is a federally conducted geographic survey that shows and records boundary lines, subdivision lines, buildings and other physical land details. Cadastral surveys are used to establish federal ownership. The federal government requires (25 USC 176) cadastral surveys of Indian Trust lands to be performed under the direction and control of the BLM.

The BLM has a Cadastral Survey Program staffed by qualified surveyors. BIA requests, as needed and funding permits, the performance of cadastral surveys on Indian Trust lands from BLM's Cadastral Survey Program. Cadastral surveys are meant to define quantity, value, ownership, and boundaries of land parcels and have legal standing in courts. The cadastral survey information is fundamental in efforts for land management of Indian Trust properties and interests. The surveys are used to settle litigation issues, jurisdictional disputes and ensure correct revenue disbursement for the Indian Trust beneficiaries.

Cadastral Survey is not individually or collectively part of an HLIP subproject or court identified breach. Concern has focused on cadastral surveys due to the large backlog that currently exists for survey work and the impact this may have on BIA's management of its Trust responsibilities.

1.2 Current State

The dollar amount required to conduct the cadastral surveys identified as backlog for Indian Trust lands is estimated to be approximately $62 million by BLM (with input from BIA). Much of the backlog is to update original surveys that are over 100 years old.

The backlog has grown to its current level as a result of several years of minimal funding amounts allocated to BIA for the purpose of conducting cadastral surveys. For FY2001 the funding amount was increased threefold (from $2.2 million to $6.5 million) which allowed for increased requests for and executions of cadastral surveys in Indian Trust lands.

It is unclear how significant an effect the current backlog of cadastral surveys has on the processing of probate cases and the distribution of revenues related to Indian land interests. BIA and BLM do not have any specifically documented information on backlogged surveys with a clear connection to outstanding probate cases or inaccurate revenue distribution concerns.

1.3 Recommendation Summary

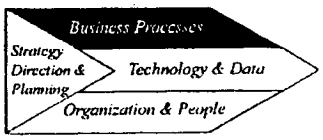
EDS recommends that BIA develop more effective oversight and management practices and improved processes regarding requesting and scheduling cadastral survey work from BLM. BIA needs to improve its scheduling and oversight of current and future survey work by improving processes to:

- Gather survey request information and prioritize survey requests.
- Schedule survey work with a global perspective through a centralized mechanism.
- Develop cadastral survey work budget for current and future years.

When BIA addresses these issues it will be in a better position to ascertain "critical needs" survey work that can effect the efficient management of Trust responsibilities associated with probate processing and ensuring correct revenue distributions.

2. Analysis and Recommendations

2.1 Develop a Schedule to Address Cadastral Survey Backlog



There is a $62 million backlog of cadastral surveys for Indian Trust land as of April 2001. This amount of backlog survey work is too large to handle in a period of a year or two. A schedule needs to be jointly developed by appropriate BIA and BLM officials that takes into consideration the amount of funding available for surveys, the availability of trained surveyors to perform the work and the prioritization of backlogged survey work.

Observations and Findings

The regional offices visited all indicated they have significant backlogs in Cadastral Survey work. This is consistent with information obtained from BLM's Cadastral Survey Group on the cost to conduct backlogged surveys at all the regional offices. The Western Regional Office (WRO) had the largest survey backlog amount of approximately $17.5 million. The backlogged surveys in WRO would update surveys for several Indian Trust lands that had surveys conducted over 100 year ago and cover other Indian Trust lands that have never been surveyed.

Historically, the funding available to BIA regional offices for performance of cadastral surveys has been low. The budgeted funds bureau-wide for the past ten years was $2.2 million per year. Each regional office was then allotted a portion of these budgeted funds. Some regional offices received $50K while others received more – the average for each regional office was $183K.

With the budget for FY2001 there was an increase in funding for cadastral surveys to $6.5 million, an average of approximately $541K for each regional office (although some regional offices received less and some received more than the average). If the level of funding for FY 2001 remained consistent for future budget years, it would take approximately ten years to process the current survey backlog.

BLM and individual BIA regional offices have worked together to identify the survey needs that can be addressed with the increased funding available for FY 2001. Some regional offices can now address certain survey needs that are larger scale and pressing for attention due to outstanding litigation or similar "critical need" situations.

Detailed Recommendations

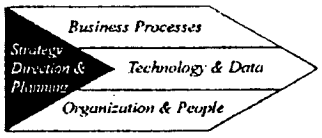
2.1.1 Create a joint BIA/BLM Cadastral Survey Working Group to develop a plan for completion of cadastral survey backlog

Create the joint BIA/BLM Cadastral Survey Working Group by using appropriate officials from within BIA and BLM. The group will have a charter to develop a schedule for completion of the

backlogged cadastral survey work. The joint Survey Working Group will determine and confirm the inventory of backlogged cadastral surveys. Based on this inventory the joint Survey Working Group will develop a recommended yearly schedule of survey work.

The joint Survey Group will review and provide recommendations on the level of funding and staffing required to support a multi-year effort to complete backlogged surveys. The group will also develop prioritization criteria for backlogged surveys that consider critical issues such as revenue enhancement, current or pending litigation, etc. These prioritization criteria will be the main tool to determine the scheduling and sequencing of backlogged cadastral survey work among and within the regions.

2.2 Determine Impact on Probate Backlogs of Cadastral Surveys



There is a possibility that some of the backlogged probate cases could be affected by backlogged cadastral surveys. The joint Survey Group can review the inventory of surveys to determine if any of these affect open or backlogged probate cases.

Observations and Findings

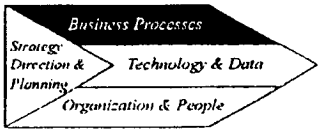
The regional offices visited generally indicated that the Cadastral Survey backlog does not have a material effect on the processing of probate backlog, but there was no documentation available to verify this impression. A regional office representative stated that if a probate case was affected by a backlogged cadastral survey that survey was pushed up in line and completed as soon as feasible. Another regional office representative noted that, in general, cadastral surveys are backlogged for all realty transactions in that region.

Detailed Recommendations

2.2.1 Perform a region-wide review and assessment of the impact cadastral survey backlog work has on probate backlog cases

As part of the joint Survey Group's effort to prioritize cadastral survey backlog work (see Recommendation 2.1 above) perform a region-wide analysis to prioritize cadastral survey work affecting backlogged probate cases and determine a time line for this outstanding survey work. The scheduling of this survey work will be done using a BIA-wide focus rather than a regional focus on probate backlog cases since some of the survey work could involve several regions. These actions will ensure that if any current or backlogged probate cases are affected by the completion of a survey, this survey work will be given the appropriate priority for completion to expedite the closing of the affected probate case.

2.3 Develop Process for Requesting Cadastral Surveys



The regional offices visited did not appear to have a formal process for obtaining and organizing requests for cadastral surveys from their agency offices. A more formal, standardized process used by all the regions will enhance the collection of key information needed to determine the extent and critical interactions of the survey. If the survey request information is collected into one centralized location that can be easily accessed by authorized officials, the planning prioritization and scheduling process for backlogged surveys can be greatly enhanced.

Additionally BLM's Cadastral Survey Program currently interacts with the 12 individual BIA regions to assess the need for, prioritization and scheduling of cadastral survey work. None of BIA regions discuss or coordinate regarding possible overlaps of survey work or conflicting prioritization criteria. If BIA uses a more global approach in this process it will reduce the number of interaction points for the BLM and increase that bureau's efficiency.

Observations and Findings

There appears to be no formal process in place to identify and prioritize regional Cadastral Survey needs. One regional office identified some forms and worksheets that were referred to when describing how survey request information is obtained, but it is unclear how widespread their use is or how informed the agency offices are on their proper usage. A review of the survey request form generates questions on whether the form is comprehensive on its information requests and is clear on what information needs to be recorded and at what level of detail by the requestor(s).

The regional offices receive cadastral survey request information from the agency offices in various levels of completeness and detail. One regional office has approximately 200 outstanding requests for cadastral surveys and relies on the agency offices to indicate whether the survey request affects litigation, probate case processing or distribution of revenues. While it seems that there is an informal assessment done by the regions on survey requests, there does not appear to be a standardized process that the regions follow to determine if appropriate levels of information are provided or assess the critical impact of these requests.

The BLM Cadastral Survey Program must interact on an individual basis with each of the 12 BIA regions to ascertain survey needs and priorities. It is difficult for BLM to determine if requested and executed surveys address the highest priority need for BIA and its Trust beneficiaries when working with 12 separate regional representatives that do not appear to coordinate among themselves. Additionally, the issue of greatest return for survey work is better addressed when cadastral survey needs are considered using a global, bureau-wide focus.

Each of the regional offices handles differently the identification and prioritization of cadastral survey needs based on their unique process and focus. As a result, BLM's survey group has 12 different processes it interacts with in working with BIA regions to develop a schedule of survey projects.

Detailed Recommendations

2.3.1 Create a standardized, automated cadastral survey work request package with input from appropriate BIA Central Office/Regional Office and BLM officials

The package would contain a request form that is clear, logically formatted and requires the input of all the necessary information about the survey to assist with planning and prioritization. As appropriate, explanatory worksheets and supporting information would be included to assist the requestor in the completion of the survey request package. Training and coaching on survey package completion should be provided to the agencies to encourage a high completion rate and collection of accurate and useful information on the agency's survey needs.

Once the standardized cadastral survey work request package is developed it should be used immediately. As the request package is developed, BIA should consider exploring methods to electronically collect, consolidate and store information from the request packages. This database

would be used to support a centralized BIA regional interaction point working with BLM to prioritize and schedule survey work.

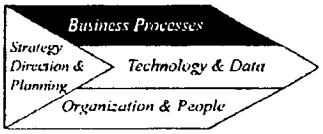
2.3.2 Identify a centralized BIA interaction point for working with BLM's Cadastral Survey Group to make the survey request and scheduling process more efficient

The centralized interaction point can be one duly authorized person or alternatively, BIA could create a working group of regional office representatives to interact with BLM survey group to prioritize and schedule cadastral surveys. Another option is to appoint or authorize one regional office representative (rotating) and one central office representative to interact with BLM survey group to prioritize and schedule cadastral surveys.

2.3.3 Immediately investigate the creation of an automated or web-based cadastral survey request system

Examine the potential for creating an automated or web-based request form for cadastral surveys that can be accessed from the agency offices. The agency offices could then submit the requests electronically to the regional offices, which can then be sent forward to a consolidated database of all the regions' survey requests. An automated or web-based system can enhance the ability of BIA to track and maintain information on survey needs by region and agency office.

2.4 Assess the Feasibility of Expanding the "Yakama" Project



BLM's Cadastral Survey Program and the Yakama Indian Nation are in a partnership called the Yakama Geographic Information System (GIS) Project. GIS incorporates several disciplines, such as surveying, Global Positioning System (GPS), and land records to create a land information infrastructure in a computer database that has geo-spatial capabilities. The Yakama Nation project combined the information resources from the State of Washington, Yakima County, BIA and Yakama Nation into a parcel (allotment) level database. It is a GIS database that incorporates information from a variety of resources and programs, i.e. health, housing, realty, wildlife, and environmental protection. The Yakama Nation and BLM state the Program has resulted in several benefits and measurable accomplishments.

Observations and Findings

The BLM and the Yakama Indian Nation have partnered to produce the Yakama Project system, a geographic information system database of both current and historical survey information. According to BLM and the Yakama Nation, the following benefits and accomplishments can be attributed to the existence of the Yakama Project:

- Reduced uncertainty in ownership lines from an average 540 feet down to only a few feet.
- Identified idle Indian Agricultural lands that accounted for $1.1 million in lost revenue.
- Determined that the county had inaccurately taxed the Yakama Nation and received a refund of $135K.

According to BLM, the Yakama Project GIS is not a stand-alone system. It is able to interface with other GIS databases for information exchanges.

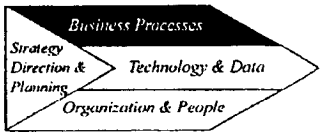
Several of the regional offices are developing GIS capabilities but they don't have the training or the resources to obtain maximum advantage from these capabilities. To have a fully developed GIS, the regional offices still need to validate survey data collected by using GPS technology and verify linkages of title and accounting information to the spatial land information system.

Detailed Recommendations

2.4.1 Review and assess the "Yakama" model for possible use in other regions or BIA-wide

Establish a Working Group (composed of regional staff, Central Office staff and BLM Cadastral Survey staff) to review the current Yakama model and determine if the model, or parts of the model, can be useful if implemented in selected regions or bureau-wide. The Working Group will assess the operation of the Yakama Project and the possible affect it has on increasing workload at BIA LTROs based on the results of updated surveys and provide recommendations for that contingency.

2.5 Improve the Cadastral Survey Budgeting Process



BIA's budget process for cadastral survey funding is not clearly understood by the regional offices, which affects their ability to effectively advance plan for needed survey work. A significant portion of cadastral survey work is for projects that can take two or more years to complete (depending on the survey sites length of climactically conducive season). If the regional offices had access to budget development information for cadastral survey funding then they could anticipate budget fluctuations and factor that into the planning for survey work.

Observations and Findings

The regional offices visited were surprised by the dramatic increase in FY2001 funds to conduct cadastral surveys. Because the regional offices were unaware of the significant increase in funds for survey work, they were unprepared to expand their request for survey work from BLM in an organized and timely fashion.

The communication of cadastral survey funding changes and priorities for the regional offices appears to not be well managed within BIA. Increased (or decreased) funding for cadastral survey work can have a significant effect on the selection of surveys done and the prioritization of survey work with respect to critical issues that are affected by that survey. Advance knowledge of funding changes assists the regional offices in the planning for "critical needs" survey work

Detailed Recommendations

2.5.1 Improve the communication and planning process between BIA Central Office and the Regional Offices for the budgeting of cadastral survey work

A budget process that ensures the regional offices are apprised in advance of funding changes and when their effective dates, significantly contributes to an improved planning process for survey work in the region. The BIA central office, working with regional representatives, needs to formulate a budget development and review process that allows the regional offices greater, but appropriate, insight into the bureau's budgeting plan for cadastral surveys. When the regional offices have this insight they are in an improved position to provide feedback to the Central Office regarding cadastral survey work scheduling and issues of "critical needs" and resource availability.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
L.2.1 Develop a Schedule to Address Cadastral Survey Backlog	9													• Creates a plan to address and eliminate survey backlog
L.2.1.1 Create a joint BIA/BLM Cadastral Survey Working Group to develop a plan for completion of Cadastral survey backlog	9													• Ensures accurate land boundary information for Trust management
L.2.2 Determine Impact on Probate Backlogs of Cadastral Surveys	9													• Identifies surveys that affect probate resolution
L.2.2.1 Perform a review and assessment the impact cadastral survey backlog work on probate backlog cases	9													• Improves prioritization and resource allocation decisions
L.2.3 Develop Process for Requesting Cadastral Surveys	9													• Improves collection of request information
L.2.3.1 Create a standardized, automated Cadastral survey work request package	3													• Enhances planning and scheduling of surveys
L.2.3.2 Identify a centralized BIA interaction point for working with BLM's Cadastral Survey Group	9													
L.2.3.3 Immediately investigate creation of electronic or web-based interface for use with the Cadastral survey work request package	3													
L.2.4 Assess the Feasibility of Expanding the "Yakama" Project	6													• Creates a reliable and comprehensive land information system for use by all regions
L.2.4.1 Review and assess the "Yakama" model for possible use in other regions or BIA-wide	6													
L.2.5 Improve the Cadastral Survey Budgeting Process	9													• Assists in advance planning survey work, scheduling critical needs surveys
L.2.5.1 Improve the communication and planning process between BIA Central Office and the Regional Offices	9													• Assists in determining availability of multi year funding

@ - Indicates ongoing efforts

M. Breach 1: Collection of Missing Information From Outside Sources

1. Overview

1.1 Description

Missing Information Breach addresses a court order which requires the Department of the Interior to establish written policies and procedures for collecting missing information (mandatory documents) from third parties, in order to render an accurate accounting to the IIM beneficiaries. Under the Reform Act of 1994, an Individual Indian Monies (IIM) account holder would be provided quarterly statements of accounts to include such information as: the source, type and status of funds; the beginning balance; the gains and losses; receipts and disbursements; and the ending balance. To this point in time the DOI has been unable to support this Act, due to the lack of information to report to individual account holders. The Office of the Special Trustee (OST) is currently responsible for 262,000 IIM Trust accounts through which over $300 million pass each year.[1]

This breach project is designed to:

- Describe the nature and extent of IIM Trust accounts since the passage of the American Indian Trust Fund Management Reform Act of 1994.
- Present a logical approach to assess the state of documentation, information and data available and necessary for the Department of the Interior to meet its obligations under the Act.
- Identify approaches and options for gathering missing documents, information and data from third parties to supplement the Department of the Interior's present files.
- Commence the planning, decision process and programming of personnel and budget resources that will be necessary for the successful gathering and organization of documentation, information and data from third parties.

1.2 Current State

A plan to address this breach was completed in February of 2000. As a result of this plan a pilot project was launched and completed. The missing information breach team completed the pilot focusing on low transaction, high balance accounts. The pilot was conducted by contractor staff and successfully completed. The information was gathered from within the Federal Government. Almost all accounts chosen for the pilot were reconciled and information to support reconciliation was collected.

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[1] Office of the Special Trustee, "*Establishing Written Policies and Procedures for Collecting from Outside Sources Missing Information Necessary to Render an Accurate Accounting of the IIM Trust*", February 2000.

As of October 1, 2001 the Office of Historical Trust Accounting (OHTA) will be taking on the majority of the work associated with the missing information breach. The OHTA has published the "Blueprint for Developing the Comprehensive Historical Accounting Plan for IIM Accounts," as well as their "120 Day Plan." These documents, in concert with the "Comprehensive Plan for Historical Accounting" (yet to be published), will provide the scope, process and planning for collecting missing information needed to establish an historical accounting.

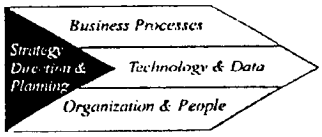
1.3 Recommendation Summary

Merge Missing Information Breach activities under OHTA to enhance the locating and updating of missing third party information requirements for the successful historical accounting for IIM accounts.

Given the complexity and importance of this recommendation to the OST, a full discussion of the recommendation is found below. All aspects of an institutionalized process for locating, validating and maintaining missing information are extremely important in the reconciliation and accounting of monies in the IIM accounts.

2. Analysis and Recommendations

2.1 Merge the Missing Information Breach Under OHTA



There are currently a number of cleanup projects and different groups impacted by the need for the collection of missing information from third parties. As a result, there are various processes and efforts used to collect data. The OHTA and the missing information breach have a similar goal and should be designed to most effectively exploit the workflow of an IIM account holder's jacket file through the various stages of accounting and reconciliation. The current effort for collecting missing information is best served by continuing to work within the process and frameworks of the OHTA for historical accounting and coordinate with the cleanup projects for current accounts.

Observations and Findings

By definition, this breach was created to find and collect information from third parties that is missing in IIM accounts. Prior to the creation of this breach, the department had been unable to provide adequate information to account holders regarding their funds. Much of the inability to provide this information was related directly to the missing documentation to support transactions in account history. This missing information is being discovered as a result of two other activities currently occurring within the Trust Management: BIA Data Cleanup and OST Data Cleanup. During the cleanup activities, jacket folders are reviewed and mandatory documents are found to be missing causing the inability to perform or prove an accurate accounting. It is at this point that these projects should continue with the work to locate the missing information. The collection of missing information is part of an end-to-end process that establishes the boundaries of an individual Indian's account under the Trust. There is a clear overlap in the data collection and verification under OHTA and Missing Information Breach.

The process currently being piloted for the collection of missing information does not have any validation process or performance metrics. In order to ensure that the information collected as a

result of the missing information breach is correct, it needs to be validated by a third party audit. This is not in the current process and is resulting in the collection of incorrect and unverified third party information.

Detailed Recommendations

2.1.1 Dissolve Missing Information as a separate project

As a proactive measure in securing missing information from third parties, these collection activities should be placed under the responsibility of the OHTA. It is during the implementation of the work performed under the OHTA that missing information from third parties is discovered for active accounts. To continue the end-to-end process of establishing valid and accurate account files, the missing information activities need to be incorporated into the processes of the OHTA.

2.1.2 Establish clear and agreed upon performance metrics, for the collection of missing data activities under each subproject

The missing information problem will continue to exist within BIA and OST until all IIM account holder jacket folders are cleaned up and a historical accounting is complete. As these activities are dissolved into the separate subprojects, the responsibility for funding and collecting missing information remains the responsibility of OST, BIA and OHTA. OST/BIA and OHTA need to continue to work and track their progress in this area. To ensure that the issue of missing information is not forgotten, the OHTA and the data cleanup efforts (when appropriate) should establish specific performance measures for collecting and validating missing information. Performance measures centered specifically on collecting and validating missing information will help to track performance and document progress and success.

2.1.3 Operate a separate Quality Assurance/Quality Control (QA/QC) process through contractor support

The purpose of QA/QC is to give management visibility into the proper process for cleaning up, identification and collection of missing information from within the organization and from third parties. The QA/QC processes verify that missing information collected is valid and verifiable. The timing and frequency of QA/QC Audits should be documented in the Quality Plan, which should outline the scope and methods of the quality practices to be implemented as part of the QA/QC Process.

The QA/QC audit criteria are intended to be established at the subproject level to enable adaptation of the QA/QC criteria for effective implementation, while ensuring that the business benefits of using common processes are achieved. The following guidelines can be tailored for use in establishing a QA/QC process:

- The QA/QC criteria should be tailored to meet the needs of the OHTA and the Data Cleanup efforts in ensuring that the documentation collected for missing information is correct and valid.

- The QA/QC criteria should be tailored to meet specific subproject needs, such as the addition of specific criteria to address the various subprojects processes and procedures for collecting missing information.

2.1.4 Coordinate OHTA (Missing Information), with the Data Cleanup Efforts

OHTA is charged with cleaning up and locating all documentation required to support a historical accounting for all IIM and Tribal accounts. This has a direct relationship to the cleanup efforts and the locating of missing information from third parties. Even though the OHTA has a different viewpoint of the Trust (historical versus forward looking), it still needs to cooperate and integrate with the other activities of the Trust. Historical accounting is an enormous effort that needs to be coordinated with the other Trust activities and would benefit from the consolidation of Trust activities under a single authority of the Indian Trust. Since there is a clear need to share and pass information between those efforts, there will need to be close coordination between the OHTA (Missing Information) and the Data Cleanup efforts.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	2Q	3Q	4Q	5Q	6Q	7Q	8Q	9Q	10Q	11Q	12Q	Outcomes & Benefits
M. 2.1 Merge Missing Information Under OHTA and Coordinate with the Data Cleanup Efforts	@											@	• Provide a more streamlined and logical approach to finding, storing and verifing current missing information
M 2.1.1Dissolve Missing Information as a separate project	6												
M.2.1 2 Establish clear and agreed upon performance metrics, for the collection of missing data activites under each subproject	<3												
M.2.1.3 Operate a separate Quality Assurance/Quality Control (QA/QC) process through contractor support	@											@	
M.2.1.4 Coordinate OHTA (Missing Information), with the Data Cleanup Efforts	6												

@ - Indicates ongoing efforts

N. Breach 3: Computer & Business Systems Architecture Framework Plan

1. Overview

1.1 Description

As stated in the third Court Breach, "The court has declared that the Trust Fund Management Reform Act placed upon Interior the duty to establish a written plan dealing with computer and business systems architecture. Contrary to this duty, however, Interior still has no such plan. It appears that Interior recognizes the value and importance of such a plan, because an architecture plan is currently being developed. "The Department [of the Interior] does recognize the importance of an overall architecture . . . Preliminary work on a system architecture has started . . . and the beginnings of our future architecture are underway." Because Interior currently has no written architecture plan, however, the court declares that Interior is currently in breach of this Trust obligation owed to plaintiffs."

In response to the words of the Court, the Trust Management Improvement Project (TMIP) attempted to create a high-level, current state Enterprise Architecture that encompasses both business and IT elements of the enterprise. However, this Architecture is not complete in that it lacks significant amounts of detail and contains gaps throughout. Key Trust business and technology leaders did not participate in its development and have not validated or accepted it for their use. This Architecture has not yet been approved for use within the Department. It should be considered, at best, a "straw model" or a starting point for further work.

A well-designed enterprise architecture is an informational representation of an enterprise that carefully links existing and future business and IT elements to support business strategies. Specifically, an enterprise architecture is used to:

- Document and improve the business processes.
- Target the need for business performance improvement.
- Context and scope business initiatives.
- Understand and communicate the relationships among processes, applications, information, infrastructure and systems management.
- Effectively manage a heterogeneous technology environment.
- Guide the selection of the appropriate technology for current and planned IT projects.
- Incorporate the impact of new and emerging IT capabilities and recommend their use.
- Establish common terminology and definition standards.
- Provide a baseline for classification, comparison, and assessment of methods.

An enterprise architecture provides a definition of boundaries and a common framework within which the enterprise can be understood. An example of a basic framework for an enterprise architecture is depicted in Figure 1. The "tower" defines all of the components necessary for business/ IT alignment.

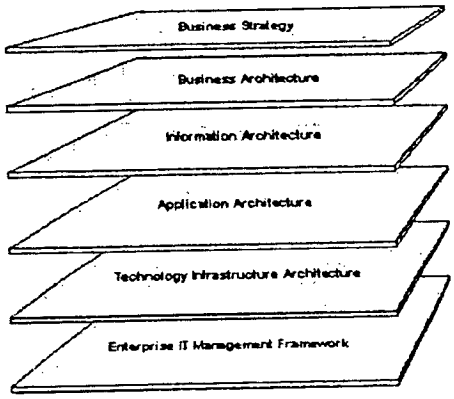


Figure 1. Enterprise Architecture Framework Model

Business Strategy
The business strategy is an important driving factor that provides the context and guidance that drives the definition of business functions, processes, systems, and organization.

Business Architecture (Business Model)
The business architecture defines the processes performed by the enterprise to accomplish particular business requirements. It creates a model for how the business operates through the definition of value streams, processes, functions and the enterprise-operating environment.

Information Architecture
The information architecture represents what information must be delivered to individuals across the enterprise to effectively execute the business processes and make informed decisions. It defines information and data management design characteristics, information portfolios, data architecture, information sources and users and value stream information relationships.

Application Architecture
The application architecture determines what applications support which business processes and specifies guiding principles, standards, and design characteristics for the acquisition and/or development of applications. The application architecture defines the application portfolio to enable business as well as cross-functional, process, and application integration requirements.

Technology Infrastructure Architecture
The technology infrastructure architecture represents the IT structure required for the execution of processes. It specifies standards and policies for infrastructure construction and defines the target infrastructure and geographical infrastructure requirements.

Enterprise IT Systems Management Framework

An enterprise IT systems management framework addresses the business and management of IT organization and technology resources. It identifies what services to provide, processes for the delivery and management of services, applications to support processes including systems and network management. It also identifies capabilities, competencies and performance models to implement the desired culture and behaviors.

A successful enterprise architecture requires participation and buy-in by both the business and technical communities to be accurate and accepted. The business value that results from the creation and use of an enterprise architecture includes minimized risk, decreased complexity, reduced cost, and improved estimating. Additional benefits include:

- Creation of a "common language" to refer to the business.
- Effective targeting of resources for improvement.
- Initiatives well scoped in areas of process, data, and applications.
- Smooth flow of data through the organization.
- Faster implementation of new systems.

Without a framework, contextual confusion and a myriad of non-integrated methods, deliverables, and systems can result.

1.2 Current State

Department Outlook

Within the Department of Interior (DOI), the Bureau of Land Management (BLM) is the only organization with an applied computer and business systems architecture. BLM went through a large strategic planning effort, unrelated to Trust funds management, which resulted in the entire bureau being reengineered. Consequently, BLM currently has an information resource strategic plan and computer and business architecture.

To comply with the Clinger-Cohen Act, the Department of Interior is currently working on its own Enterprise Architecture that will contain both business and IT elements. This architecture is intended to overlay and integrate with each of the Bureau architectures. Progress on DOI's departmental level architecture has been delayed as a result of resource shortages. Additionally, the DOI plans to develop a five-year IT strategic plan. Although a DOI e-government initiative has been defined, it has not been funded.

Trust Management Enterprise Architecture

The Architecture Working Group (AWG) completed a high level Enterprise Architecture for Trust Management in August 2001. Pending completion of the present DOI assessment effort, the distribution of this Architecture has been limited to the Trust Management Technical Oversight Committee, select DOI leaders, and the General Accounting Office (GAO). Currently, DOI has budgeted one third of the funding originally requested for the Trust Architecture.

GAO reviewed other Trust subprojects and inquired about their relationship to the Architecture and the Trust Architecture's relationship to the DOI Architecture. GAO has not yet produced a report of their findings.

The AWG's Trust Architecture was constructed using a framework developed by Dr. Steven Spewak, a renowned leader in Information Technology Architecture. Additionally, development of the Architecture was performed in compliance with the Clinger-Cohen legislation and GAO guidance. The knowledge and experience gained from the development of the BLM Architecture was also leveraged to build the Trust Architecture. As an example, the AWG's Computer and Business Systems Architecture principles were adapted from those defined by BLM. Though methodologies and architecture experience was used, the effort lacked Trust business community involvement. Therefore the business community has not accepted or validated the Architecture.

The Computer and Business Systems Architecture Project created a high-level skeleton of the Trust enterprise. It resulted in the identification of principles and an understanding of the current landscape of the enterprise. This Enterprise Architecture Planning effort satisfied an important first step towards the Enterprise Architecture for Trust Management. AWG's goal in this effort was to produce a planning level architecture. However, the resulting architecture lacks detail and does not represent the business processes to a level to be useful in process or system analysis. Additionally, process variations unique to various organizations or entities (e.g. regions, tribes, agencies) were not detailed.

A well-designed enterprise architecture is an informational representation of an enterprise that carefully links existing and future business and IT elements to support business strategies. Therefore, the architecture needs further development in areas such as the business model and technology (i.e. networks, security, sizing); it should be defined to a level that helps to assess and improve business functions. This architecture will provide a foundation to improve the efficiency and effectiveness of the enterprise.

Finally, the Architecture documented existing interfaces and made some basic recommendations about interfaces and application integration.

EDS supports the concept of an architecture management office. Though technology upgrades are important, any implementation of technology should be preceded by development of the architecture to an appropriate level to ensure optimal integration with the existing and future environment.

The Trust Management Enterprise Architecture Working Group identified two major groups of recommendations. As published in the August 2001 Enterprise Architecture Planning Project Transition Plan & Project Summary, these recommendations were:

- ***Technology Upgrade***

  Modernize the Trust Management Application Integration Architecture using Enterprise Application Integration (EAI) technology

  Create Trust Management Portals for internal and external use with seamless access to applications and documents

  Create a meta-data repository documenting information assets, contents, structures and formats, business rules, custodial responsibility (stewards), and locations

  Create a Trust Management Data Warehouse

- ***Establish Trust Management Enterprise Architecture Project Office***

  Maintain the Trust Management Enterprise Architecture; establish and support the Architecture Coordination Council

  Develop budget, funding, and contract specifications documents, including detailed project plans

1.3 Recommendation Summary

It is important to leverage the work that has already been performed by AWG. However, a sizeable effort, with participation of the entire Trust community, will be required to complete a comprehensive Trust Management Enterprise Architecture. EDS' review of the existing Computer and Business Systems Architecture has resulted in three overarching recommendations for improvement:

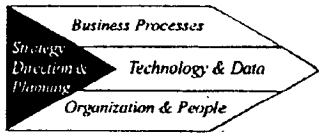
Develop a comprehensive Enterprise Architecture. The structure of the Trust Management Enterprise Architecture is consistent with industry practice and is a very basic representation of the entities involved in Trust Management. However, it is a high-level first step. There is a significant amount of work still necessary to develop the architecture in more detail. This will define both business and IT components of the current state and future state and help perform gap analysis activities and transition planning. It may also be necessary to consider significant modifications to the existing processes and approaches to managing Trusts.

Develop the governance discipline to manage the Trust business processes. Trust Management Leadership must strengthen its ability to determine the business performance improvement investments that will best enable the attainment of business strategies. Additionally, it must strengthen its process governance to ensure that improvement initiatives are integrated and sufficient to achieve goals.

Institute an Architecture Center to manage the Enterprise Architecture. The formation of an Architecture Center will be critical to the ongoing success of building and maintaining the Enterprise Architecture in a complex environment. All of the architecture components should be carefully managed as a whole from this central point.

2. Analysis and Recommendations

2.1 Develop a Comprehensive Enterprise Architecture



Although the structure of the existing Trust Management Enterprise Architecture, published in August 2001, is consistent with industry practice, it is a very basic representation of the entities involved in Trust Management. It fundamentally includes business process, information, application and infrastructure elements, all of which are presented in a way that conveys an understanding of the importance of business and technology integration.

The current state of the Trust Management Enterprise Architecture is a high-level first step and must be further developed to include more detail to achieve its intended purpose. There is a significant amount of work remaining in the definition of the current state and future state architectures, gap analysis activities, and transition planning. As a part of the continued architecture development effort, it may also be necessary to consider significant modifications to the existing processes and approaches to managing trusts.

Additionally, it is important to validate the current Architecture and verify the accuracy of its Business Model component. To be understood and embraced as a valuable management tool, the Architecture must also be socialized throughout the Trust Management community.

Observations and Findings

The Architecture Working Group developed the foundational Business Model upon which the Architecture was constructed. The AWG consists of IT representatives from the department's CIO's office, BIA, OST, BLM, MMS and OHA. For the architecture development effort, the AWG augmented their knowledge of the business with some interviews and input from field staff.

The members of the business community involved in Trust had little or no involvement in the development of the Business Model, therefore, they have not embraced or validated it. Upon the Trust community's acceptance of the Business Model, members of the Architecture Working Group plan to continue with the detailed build-out of the Trust Management Enterprise Architecture.

Though the AWG considers the Enterprise Architecture planning effort complete as a planning tool. EDS disagrees with the level of detail it contains. This is a difference in methodology opinion that will be corrected as the Architecture is further developed.

The BLM Architecture was used as a starting point for developing the Trust Management Enterprise Architecture. The current state Application, Data and Technology Architectures were well documented at a high-level. However, the Architecture components do not yet include any future state analysis or related transition plans.

The Business Model and its associated processes address the core requirements for the Spewak methodology. Efforts are planned to carry forward what the Architecture Working Group has done to the next level of detail. Some of the required level of detail will come out of a parallel effort at BIA. A BIA Land Title and Records Enterprise Architecture is being developed. A contractor has been retained by BIA to take this Architecture to the next level of detail, but this

effort has fallen behind schedule. When completed, it is expected to include models for Trust processes (including Range, Land Title Records, Forestry, Transportation), draft metrics, Information Resource Management aspects, data flow diagrams, a future state view of the business, and identified opportunities.

The current version of the Information Resources Catalog (IRC) contains brief descriptions of the 70 identified systems that support Trust Management. The IRC lacks important data attributes such as the number of programs, programming languages, transaction volumes and system deployment. The information quality varies because some systems were well documented and others were not. Also, some bureaus have not populated the IRC at all with their application information.

The Data Architecture demonstrates a solid understanding of the need for data to be aligned with business processes. However, it lacks common definitions and views of data that are essential to improving the flow of work across organizations involved in Trust processes, including entity relationships and data normalization.

The Technology Architecture is incomplete, even at the highest level. It does not address some key areas (e.g., networks, security, sizing) and focuses solely on computer platforms. As the technology environment that supports Trust Management, the DOI and its bureaus evolves, care should be taken to ensure that their designs are as consistent as possible.

Information in the existing Trust Management Enterprise Architecture that was contributed from bureaus and offices (BLM, BIA, OTFM, etc.) varies in its breadth and depth. As a result, there is representation of the current "stove piped" environment instead of a true representation of Trust processes as they flow across organizational boundaries. The stated intention of the AWG is to integrate these components, however, much of that work has not been completed to date.

Lacking the acceptance of a comprehensive Trust Management Enterprise Architecture, systems have continued to be designed and deployed without appropriate consideration of architectural impacts. Inconsistent information formats and interfaces are symptoms of this situation.

Much of the Trust community has not been educated on enterprise architectures. They do not understand why it is needed and how it is used for both business and technology purposes, its value and benefits, and how the architecture represents them. Instead, the focus has been on completing the first draft of the Architecture. The successful adoption of the Architecture will require a cultural change throughout the Trust Management environment.

The AWG is aware of many of the tasks necessary to complete the definition of the architecture, but, due to resource and staffing constraints, they could not accomplish everything in the timeframe allotted. However, because critical, prerequisite steps have been omitted, (e.g., helping the enterprise understand the need and use of the architecture), it is likely that, even if the effort had proceeded, the results would not have been accepted by the enterprise.

Despite the identified developmental needs, the Trust Management Enterprise Architecture is more complete than the DOI architecture. Interview feedback indicates willingness by AWG leadership to adhere to and embrace DOI's departmental principles, but there aren't many in place yet. It will be necessary to monitor the development of the DOI Architecture as well as relevant government architectures at higher levels to ensure that the Trust Management Enterprise Architecture is consistent. To this end, the AWG Chair has been communicating with the DOI's architecture manager.

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Detailed Recommendations

2.1.1 Assist Trust leadership to understand how they can benefit from using the Architecture

To obtain their requisite support for completing and implementing the architecture, Trust leadership must understand the inherent value and benefits of managing with an architecture. To accomplish this goal, it is recommended that focused discussions with Trust leaders be conducted early in the development process. This endeavor will likely be ongoing, and though it must start early in the process, additional development initiatives can begin while the education effort continues. Appropriate education can be accomplished through methods such as intensive workshops, visits to leading industry practice sites, mentoring, and individual study. The full support and understanding of leadership will be critical when it comes to putting the necessary governance in place.

2.1.2 Leverage existing efforts to complete development of the Current State Architecture

As identified in the Observations and Findings above, the current Computer and Business Systems Architecture is not complete. While some aspects of the framework are only lacking detail (such as the IRC), there are other components that require a thorough reworking with active participation from key business representatives (e.g. enterprise business model). When completed, this effort will ensure that functional business interfaces and needs are identified, information and data are derived from the needs of the business, applications are driven by informational needs, and technology selections are in support of the application portfolio.

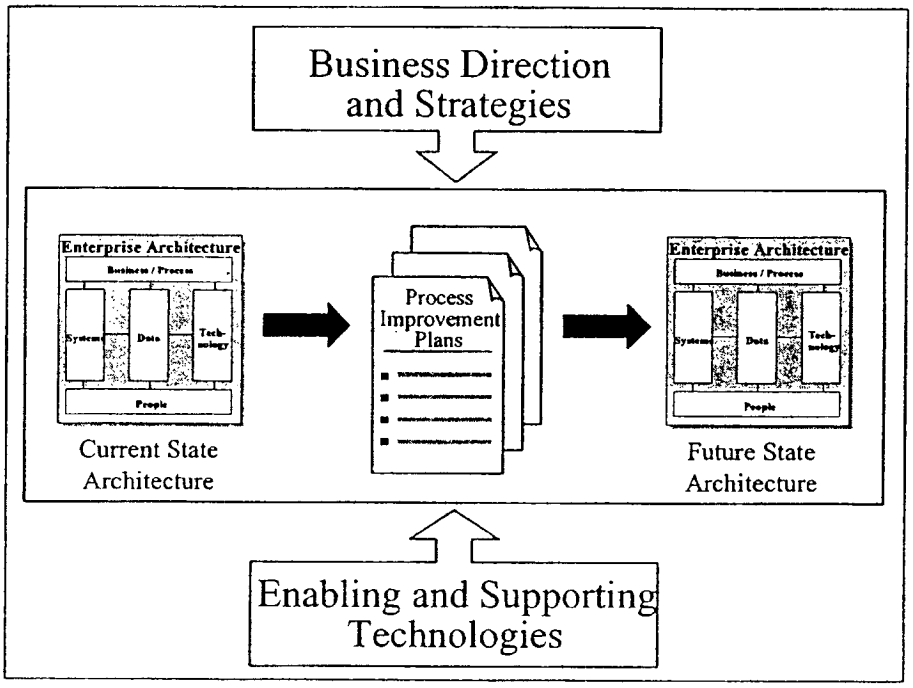
Additionally, the use of the following tools should be considered:

- Institute workflow management to support business flows within and across bureaus to help institutionalize process changes.
- Utilize Computer Based Training (CBT) tools to aid in the education of process and job requirements to be provided by the School of Trust Management. (See Detailed Recommendation 2.1.2 under the Training Subproject Assessment.)
- Employ business process analysis tools and techniques that will capture important linkage points, responsibilities, processing times and other data that will enable analysis of business improvement opportunities.

2.1.3 Develop the future state Architecture and transition plans

In its present form, only the current state Architecture has been addressed. While specific technologies have been identified to bridge the gap between the current and future states, there have been no formal gap analysis and transition planning activities. These plans must be developed before any particular technology or solution is implemented. Premature technology selections will lead to increased implementation complexities needlessly occupying additional staff and leading to unplanned spending and potential budget concerns.

The following diagram illustrates how the Business Direction and Strategies drive the creation of Process Improvement Plans to transition to the To Be Architecture.



2.1.4 Involve key business and technical leaders in the Architecture development

Although key business and technological leaders lacked awareness and were not involved with the project to develop the Trust Architecture, it was allowed to continue. Serious concerns now exist about the accuracy, completeness and usability of the resulting product. Lessons learned should be applied for future efforts to develop an architecture that is both understood and accepted. The need for involvement from representatives of both business and technical circles is two-fold. First, balanced participation from different organizations increases the accuracy of the information contained within the Architecture. Second, the acceptance of the Architecture as a management tool will be greater when more leaders have a personal stake in it. Much of the work to validate and complete the architecture will be performed or led by Process Owners, (a role that is described in Recommendation 2.2), and develop the governance discipline to manage the Trust Management business.

Since the Business Model is the foundation for the definition of all other layers of the Architecture, it is imperative that it be validated and embraced by the business leadership within the Trust Management community. Without their acceptance and commitment, to this model, the integrity of the Architecture and its usefulness as a management tool is weakened.

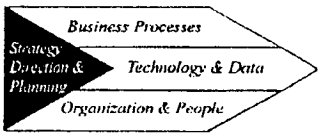
2.1.5 Provide architecture education throughout the Trust Management community to promote understanding

A successfully implemented architecture is maximized when all levels of the organization, from leaders to users, understand the value and impact of adhering to the architectural principles in the context of their responsibilities. Trust processes are performed primarily by DOI bureaus, but some compacted/contracted Indian Tribes perform their own work. For both cases, an architecture can provide considerable business value and integration by serving as a common view and definition of the Trust business.

2.1.6 Socialize the Architecture and make it readily available throughout the organization

Interviews have indicated that most of the Trust Management community has not seen the Trust Management Enterprise Architecture, though some are aware that one has been drafted. Once the Architecture has been completed and approved for implementation, it will be crucial to disseminate it throughout the organization in such a way that it can be updated as required and referenced by everyone in its most current state. This will have the benefit of developing a common view and understanding of the Trust business.

2.2 Develop Process Governance



The DOI must improve its ability to determine the business performance improvement investments that will best enable the attainment of business strategies. Additionally, it must improve its process governance[1] to ensure that improvement initiatives are integrated and sufficient to achieve goals. These can be achieved through the following activities:

- Create a high-level Steering Committee to oversee all Trust processes.
- Appoint Process Owners and Process Operators.
- Align business performance improvement investment to strategic objectives.

Observations and Findings

No systematic approach currently exists to improve the overall business performance of Trust Management Processes. Investments to improve business performance are conceived and approved within individual organizations involved in the Trust business to improve their individual parts of business processes that flow across organizational boundaries. Moreover, the investments are made without considering their overall effects on Trust Management and without an overall determination of where improvement is most needed.

A consistent understanding of Trust processes is lacking within the Trust community. Instead, each group has its own view of work that flows across organizations. Awareness of external and internal constituent requirements is deficient, resulting in "gaps" and rework as work is handed off among the groups.

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[1] Process governance as described here is separate and distinct from the Trust Board.

Aside from top DOI leadership, no end-to-end accountability exists for business performance. Performance is inconsistently monitored and performance metrics are poorly defined and under utilized.

Efforts to improve performance through business and technology changes are most often based on local judgment, without knowing their effects on overall Trust performance. Improvement initiatives do not always coordinate business and technology issues. No consistent procedures are defined for the approval and funding of improvement initiatives. The alignment of improvement investments to business strategies is often lacking.

The primary emphasis of the Enterprise Architecture Planning initiative and its proposed implementation was to improve the IT infrastructure. Its primary emphasis was not to propose how it could be used as a management tool and to integrate the business and technology components of Trust Management. The need for portals, application integration technology, a meta data repository, and a Trust Management data warehouse as defined by the AWG may be valid, but should not draw attention away from the need for improved processes and management of business and technology interests.

Detailed Recommendations

2.2.1 A permanent, high-level Steering Committee must be established to govern the Trust process

The Steering Committee's primary objective is to manage Trust processes as an overall *system*. Using the Business Model component of the Enterprise Architecture, the committee has the responsibility to identify the areas of Trust Management, or processes, that must improve to meet Trust Management strategic objectives. The Steering Committee should consist of Process Owners and key Process Operators (defined in Recommendation 2.2.3). Constituent requirements must be strongly represented by internal Trust membership who are in close contact with their constituencies. Additional committee membership may include technology representatives and contributors from outside the Trust community for processes that interact with Trust processes.

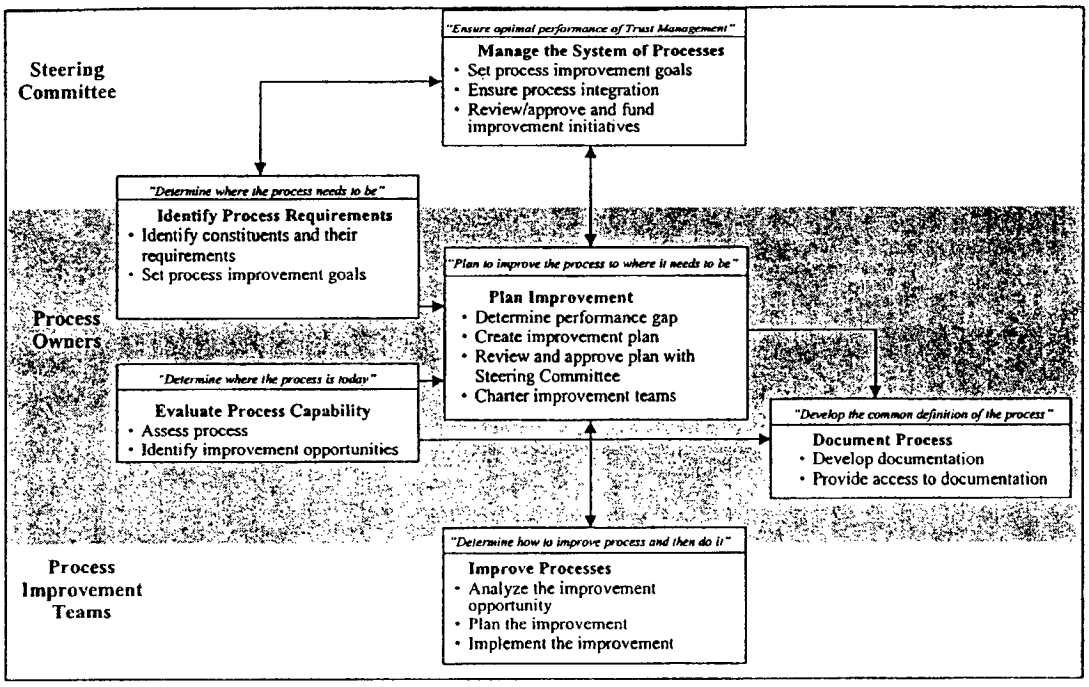
2.2.2 The Steering Committee must set performance goals for business processes

The Steering Committee should determine what processes must be improved by linking Trust strategic objectives to the processes. For these targeted processes, the committee can set improvement goals in terms of the process performance measures.

2.2.3 The Steering Committee must appoint Process "Owners"

The processes are based on the Enterprise Architecture's Business Model. The primary objective for assigning the Process Owner role is to establish end-to-end Trust process ownership and accountability. Process Owners will develop process definitions in the architecture that will become a common language to refer to the Trust Management business. Processes will be defined and designed to meet the needs of external and internal Trust constituents. Process Owners will work closely with Process Operators who are key representatives of organizations that perform all or part of the processes. Process Operators must share their needs and problems with Process Owners and must implement the common processes.

The following diagram illustrates that the Steering Committee is responsible for the overall system of processes. Process Owners determine customer requirements, evaluate current process capability, and plan and manage process improvements.

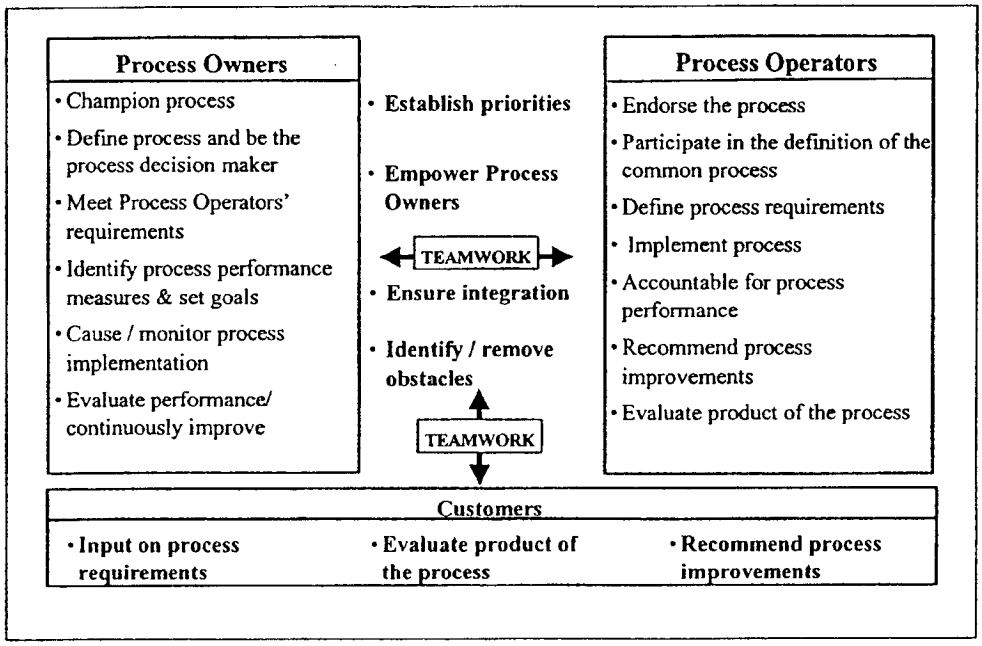


2.2.4 Process Owners must establish process measures, assess process performance and create improvement plans

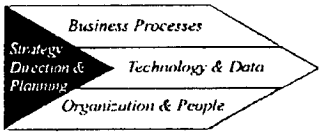
Working with Process Operators, Process Owners will establish process performance measures. They will assess current process performance using the measures. To close the gaps in performance between current levels and goals set by the Steering Committee, the Owners will develop improvement plans.

The improvement plans will consist of integrated business process and technology initiatives that are defined and scoped based on the process, applications, data and technology components of the Enterprise Architecture. Improvement initiatives must be approved by the Steering Committee and scoped within the context of the Enterprise Architecture. This is necessary for project coordination and the integration of their results. Owners will present their improvement plans to the Steering Committee. The Steering Committee will determine if the plans are sufficient to meet required performance levels, evaluate the plans for overall integration, and fund initiatives.

The following diagram illustrates that Process Owners and Operators are responsible to design, improve and implement processes that will meet Customers' needs.



2.3 Institute an Architecture Center



The formation of an Architecture Center will be critical to the ongoing success of building and maintaining the Enterprise Architecture in a complex environment. All of the Architecture's components should be carefully managed as a whole from this central point.

Observations and Findings

The current Trust Management Enterprise Architecture organization consists of the Architecture Working Group (AWG) that is staffed with ten to twelve part-time members with a full time project manager. The AWG reports to the Technical Oversight Committee that consists of five Bureau CIO-level individuals and is chaired by the architecture's primary sponsor, the DOI CIO. The Technical Oversight Committee evaluates and approves documents produced by the AWG.

Some disagreement exists within the Trust community about whether the oversight of the Enterprise Architecture best belongs within an operational or an information management organization. The AWG's *Computer and Business Systems Architecture* document suggests establishing a Trust Architecture Center with permanent staff in the near future.

Detailed Recommendations

2.3.1 Create an Architecture Center

EDS supports the AWG's recommendation to create an Architecture Center. However, the Architecture Center should have more of a custodial role in managing and maintaining the information content of the architecture. Architecture Center members would work with business and technical representatives who would create and own the architecture content. The Architecture Center would set standards for the types and formats of architecture content.

The Architecture Center also has the responsibility to make the Enterprise Architecture available and accessible. This is particularly important for the Business Model to foster a common understanding of Trust business processes.

2.3.2 Develop implementation plans

Once established, the Architecture Center can begin to plan what the next steps should be. Examples include ensuring smooth implementation, socialization, feedback, and making the Architecture an accurate and effective management tool.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos.)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
N.2.1 Develop a Comprehensive Enterprise Architecture	@	@	• Provides a clear picture of the enterprise for informed decision making • Provides an overall high level view of the enterprise as it evolves
N.2.1.1 Assist Trust leadership to understand how they can benefit from using the Architecture	<3		
N.2.1.2 Leverage existing efforts to complete development of the Current State Architecture	8		
N.2.1.3 Develop the Future State Architecture and transition plans	6		
N.2.1.4 Involve key business and technical leaders in the Architecture development	13		
N.2.1.5 Provide architecture education throughout the Trust Management community to promote understanding	16		
N.2.1.6 Socialize the Architecture and make it readily available throughout the organization	@	@	
N.2.2 Develop Process Governance	10		• Targets improvement spending to achieve the maximum benefit
N.2.2.1 A permanent, high-level Steering Committee must be established to govern the Trust processes	<3		
N.2.2.2 The Steering Committee must set performance goals for business processes	<3		
N.2.2.3 The Steering Committee must appoint Process "Owners"	<3		
N.2.2.4 Process Owners must establish process measures, assess process performance and create improvement plans	6		

Recommendation	Duration (mos.)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
N.2.3 Institute an Architecture Center	<4		• Allows for integrated management of Architecture components
N.2.3.1 Create an Architecture Center	<3		
N.2.3.2 Develop implementation plans	<3		

@ - Indicates ongoing efforts

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O. Breach 4: Workforce Planning

1. Overview

1.1 Description

Workforce planning is an approach to determining current and future staffing needs based on business strategy and direction, developing retention and recruitment policies to make swift decisions on how best to manage the workforce, and preparing for future needs through succession planning.

In *Cobell v. Babbitt*, Civil No. 96-1285 (RCL), the United States District Court for The District of Columbia stated, "The court has declared that the Trust Fund Management Reform Act requires Interior to establish a written plan for the staffing of IIM Trust Management functions. Contrary to this duty, however, Interior currently has no such plan... Because Interior currently has no staffing plan as required, the court declares that Interior is currently in breach of this Trust duty owed to plaintiffs."

A quote from Comptroller General of GAO, David Walker, underscores the issues around workforce planning in the government, "The federal government faces a human capital crisis of significant proportions. The federal workforce is smaller. It is older. It is, in many cases, out of shape and faces serious succession planning and skills imbalance challenges. Steps need to be taken to recognize that in order to maximize performance and ensure the accountability of government, you can't do it without people, and you can't do it without making human capital strategy a top priority."[1]

In response to the breach, the Department developed a workforce planning project to address staffing needs and plans as well as overall workforce development and planning. Per the Workforce Planning project plan (February 2000), the Workforce Planning Breach includes implementing a methodology through which "organizations will validate and/or update their existing workforce plans, or initiate a comprehensive process that provides a framework for making staffing decisions and ensuring the right number of people with the right competencies are in the right jobs at the right time." Workforce planning also encompasses hiring and recruitment programs, retention, and individual development planning.

1.2 Current State

Workforce planning is new to DOI. Currently there is not a consistent workforce planning process followed throughout the Department. Regional Directors and Superintendents have traditionally left staffing and workforce planning activities to Personnel Directors, as they have not seen it as part of their responsibilities. As there was no identified workforce planning policy to follow, or anyone requiring a regular workforce planning process be followed, very little in this area prior to October 2001 had been accomplished by either Regional or Personnel Directors.

Because of the court's requirement to develop a Trust Management staffing plan and recent DOI executive direction (Deputy Commissioner of Indian Affairs), the subproject's focus is on

[1] Figuera, Susannah Zak, "The Human Touch," Government Executive Magazine, August 21, 2000.

staffing plans and filling vacancies rather than overall workforce planning – workforce planning is currently a lower-level priority to filling the vacancies. This executive focus has trickled down to the regions and agencies, making Trust Management staffing a number one priority.

The focus on staffing appears to be well overdue. BIA has the highest vacancy rates for Trust Management positions, currently calculated at approximately 11.1% (per the Director, Office of Human Resources Policy, Office of the Assistant Secretary – Indian Affairs). However, these numbers have to be substantiated by the exercise currently underway to identify encumbered and vacant Trust positions. The objective is to reduce the vacancy rates to less than five percent.

The project has developed a Workforce Planning Guide and process, but as stated above, filling the vacancies has superseded implementing the process. It is not a question of whether or not the project has completed their work; it is a question of implementing their work throughout Trust Management organizations.

1.3 Recommendation Summary

The EDS team recommends that DOI develop organizational work plans focused on workforce planning, staffing, recruiting, retention and retirement forecasting. To accomplish this, DOI should establish a single organization to develop, coordinate, and lead Trust Management workforce planning and training efforts. Putting both disciplines under one leader will allow coordination and integration between the two subprojects. This organization should reside in the proposed Indian Trust and will be called "Workforce Management and Training." Workforce Planning should not be considered a project or a subproject but a permanent entity (or team) within the Workforce Management and Training organization. Staff making up the Workforce Planning team should not have other job responsibilities. Their full time positions would be to support the Workforce Management and Training organization. To support this recommendation, the following must also occur:

- The workforce planning methodology that has been developed and documented by the subproject needs to be institutionalized throughout the Indian Trust. Managers and supervisors need to be educated/trained and then held accountable to these standards. This will result in better forecasting of resource needs, better planning for filling those needs, and ultimately lower vacancy rates.

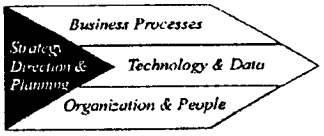
- Once the positions needed are identified, a new approach to filling vacancies should be developed including options such as outsourcing and seasonal employment, as well as a stronger emphasis on local recruiting.

Workforce planning recommendations and activities should be considered part of the overall Trust reform strategy. Workforce planning impacts all areas of Trust reform, not just one specific area, functionality, bureau, or office. It is critical to overall business planning to have the right people in the right place at the right time. In order to advance Trust Reform goals and objectives, the right people, and in sufficient numbers, need to be in place to do the work. Currently, hiring and staffing is one of the areas consistently criticized across Trust organizations. This issue, however, is not unique to DOI. According to a recent GAO study on high-risk management issues facing government, "Human capital shortfalls are eroding the ability of many agencies—

and threatening the ability of others—to effectively, efficiently and economically perform their missions."[1]

2. Analysis and Recommendations

2.1 Appoint a Permament Workforce Planning Manager



The Workforce Planning project has been under temporary leadership and has only recently begun to take definitive action. Regions and agencies are reviewing staffing rosters and developing staffing strategies, but much more work is required. Strong, permanent leadership followed by a series of coordinated workforce planning activities is required to ensure a capable and adequately staffed Trust Management organization.

Observations and Findings

Three temporary project managers have been in place since the establishment of the Workforce Planning project. A temporary project manager is still in place, while a full-time position has recently been funded and is being advertised. Members of the project all have other full-time responsibilities. As a result, decision making as well as the implementation of workforce planning concepts has been harder to disseminate across the Department.

For example, the 2001 Indian Trust Management Workforce Planning Study resulted in an initial list of Trust Management positions. This list has been translated into staffing "rosters" for each region. By October 15, 2001, regions were asked to review the roster for their region and identify which of the positions were encumbered (filled positions) and which were vacant. By October 31, 2001, the regions were to review the list again and identify positions that were no longer needed or funded, and could be removed from the list. The result of this exercise should be a new vacancy rate for BIA; however, in November the effort was put on hold. Executives within the Department have questioned the accuracy of the study results, and there is an effort planned to re-look at the definition of a Trust Management position to ensure the definition is correct, all positions have been identified, and positions on the list are truly Trust positions. EDS heard similar concerns at field offices that the rosters were not completely accurate. The problem emerging is that leadership has not been in place to define Trust Management positions, socialize the definition among key stakeholders, and ensure that the definition is consistently applied across the Department.

The Workforce Planning project has done an excellent job developing detailed workforce planning reference materials and procedures. However, training and implementation of these industry standards and procedures has been put on hold, as the roster review and staffing plans have taken priority.

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[1] Figura, Susannah Zak, "Fighting for Talent," Government Executive Magazine, April 1, 2001.

Detailed Recommendations

2.1.1 Appoint a strong, permanent leader to guide Department activities in the area of workforce planning for Trust Management positions

The Workforce Planning project has been passed from one temporary project manager to another resulting in no strong leadership. The project requires a strong leader with workforce planning as a priority focus to put a consistent workforce planning strategy in place for the new Trust Management organization. The permanent project Manager position has been advertised, but is not filled. Once a decision-maker is in place, progress can be made in defining what constitutes a Trust Management position and the roster reviews can be continued.

2.1.2 Continue with the current staffing activities

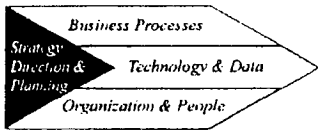
While it is important to establish accurate listings of Trust Management positions in the Department (through the rosters), offices cannot afford to hold off on recruiting and staffing efforts while the rosters are being finalized. Identified and needed Trust Management vacancies should continue to be filled as soon as possible.

2.1.3 Keep the emphasis on overall workforce planning

Staffing and recruiting are only part of workforce planning, and more planning is necessary to ensure an adequate workforce is in place to meet future Department needs. According to the Comptroller General, workforce management is a critical area. In early 2001 he stated, "...Strategic human capital management is a pervasive challenge in the Federal Government. At many agencies, human capital shortfalls have contributed to serious programmatic problems and risks."[1] Workforce planning processes and tools need to be re-examined to ensure they can be used to accurately forecast workforce needs. In some situations, workforce planning will need to be conducted for specific project areas that cut across multiple regions, agencies, etc. An example is the TAAMS project. Following the initial implementation of a new enterprise system such as TAAMS, EDS recommends a needs analysis be conducted, at each site, to determine how roles, responsibilities, required skills, and training will change following the full implementation and adoption of the system.

Per the 1990 Comptroller's Handbook for Fiduciary Activities (OCC, 1990), "Recruitment of new personnel is an integral part of any management plan. The examiner can have greater confidence in the continuity of top and middle management if he or she knows that the bank has an inflow of new personnel at lower levels and that training procedures and advancement policies will keep the organization viable and dynamic." This statement is also applicable to DOI and its Trust functions.

2.2 Prepare Management for new Responsibilities and Skills



Workforce planning is new to DOI – and everyone is learning. Management cannot be expected to suddenly take on these new responsibilities, but instead needs to be trained and provided with adequate tools that will enable them to develop workforce strategies and forecast staffing needs.

[1] GSA Office of Governmentwide Policy, Office of Real Property, "Succession Planning Guide," Summer 2001.

Observations and Findings

At the present time, a consistent workforce planning process (for Trust Management positions) is not followed throughout the Department. This project has done a significant amount of work developing a workforce planning process, guide, and associated training; however, the implementation has been delayed due to the focus on filling vacancies. The guide is very thorough and follows the 5-Step Workforce Planning Model developed by Office of Personnel Management (OPM) and the Human Resource Management Council.

Regional offices have not traditionally been involved with workforce planning activities. The only type of workforce planning that has been completed at the regional level is filling vacancies, and this function has been performed by Personnel Directors. Generally, Regional Directors and Superintendents generally do not see workforce planning as part of their responsibilities. Regional Personnel Directors have been responsible for posting open positions in USA Jobs, have prepared hiring documentation, and have worked with agencies to fill positions. They have not typically been involved with long-term planning for staffing needs and projections.

A contractor developed a staffing tool for DOI, but it has not been fully utilized or well-received. There were several reasons why the tool has not been adopted including: the data the tool was built on is static and is now out-of-date, the interface was not considered to be user-friendly, and proper training was not provided to managers who might benefit from the tool. There has been some discussion about converting the tool to a web-based design with access to dynamic personnel data, but no decisions have been made.

Detailed Recommendations

2.2.1 Begin the cultural change process for management to understand their new workforce planning role and responsibilities

The workforce planning activities planned for rollout by the Workforce Planning subject will require a cultural change by many of the leaders responsible for Trust work. Part of the subproject's charter should be to help directors, superintendents, and supervisors understand that their role from a workforce management perspective is changing – and now includes workforce-planning responsibilities. In order for management to take on this role, they will need the right tools and information. Often government personnel are expected to take on new responsibilities without the required tools to be successful. According to Paul Light, an expert in the area of government workforce planning and management, "Day after day, [the federal government] asks too many of its employees to do the nearly impossible." He also reported that 59% of 1,051 federal workers recently surveyed said they rarely have the tools to do their jobs.[1]

2.2.2 Train Management on workforce planning processes, techniques, and tools

The project has started to develop training materials, but should consider using materials and the instructor from a workforce planning class that has already been developed and delivered by the Albuquerque Learning Center/DOI University. As an example, one class participant from OTFM was extremely pleased with the Albuquerque class and felt he left the class equipped with solid tools and processes that he could apply to his management functions.

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[1] Hasson, Judi, "Government gets mixed grades," Federal Computer Week, October 31, 2001.

2.2.3 Provide support to management to assist with workforce planning processes

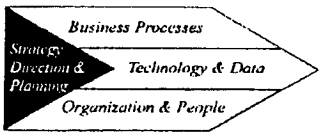
Support in the short-term should be provided to Regional Directors and other managers with significant workforce planning requirements in addition to training. Support should be in the form of one-to-one consultation, either on the phone or in person. Consultation could be provided through government or contractor staff well versed in workforce management practices and requirements.

The Workforce Planning project staff should assist the proposed the Indian Trust in determining what Trust functions may be candidates for outsourcing. The Workforce Planning project can provide information to the Indian Trust organization on Trust areas where it is more difficult for the Department to attract, develop, and retain skilled, qualified individuals. The project would also assist the Department in analyzing the impact of outsourcing various Trust functions.

2.2.4 Investigate and invest in workforce planning tools that could streamline and automate the process

The Workforce Planning project should look at the tools available through OPM's workforce planning website, www.opm.gov/workforceplanning/index.htm, as well as the contractor provided tool, and determine the Department's needs in terms of a workforce planning tool. The contractor provided tool may be something that could assist managers – if it is redesigned to be web-based, with access to dynamic personnel data. However, before committing to any tool(s), other available (and free) tools should be examined.

2.3 Redesign Practices to Include Central Recruiting



Trust Management recruiting has not been a priority in recent years, leading to high vacancy rates. Recruiting practices need to be modernized to include a greater emphasis on local recruiting and a central recruiting resource to support the field offices in their recruiting activities.

Observations and Findings

In recent years, there has not been an aggressive recruiting effort for Trust Management positions resulting from the lack of a central recruiting officer or organization managing or supporting recruiting activities.

USA Jobs is the preferred (and primary) method used for recruiting Trust Management positions. Field offices do little to no local advertising, as they see the cost, bureaucracy, and approval of local recruiting prohibitive. Interviewees reported that local advertising must be approved by Central Office and was often too expensive and time-consuming to attempt. However, there may be some misperceptions by field offices on true DOI requirements and costs of local advertising. Per the Director, Office of Human Resources Policy, Office of the Assistant Secretary – Indian Affairs, "The BIA has no requirement that the Regions obtain the Deputy Commissioner's approval to advertise a vacancy locally. The Regions are supposed to notify BIA's Office of Public Affairs (and provide a copy of the ad) for information purposes only."

Some of the regulations around recruitment are very restrictive, resulting in a long hiring process. Because DOI recently raised the security risk for all employees, regions cannot bring a new hire on board until the security officer in Albuquerque has reviewed the application. This, along with

other delays, results in the hiring process taking about three months for positions such as Forestry and Realty Specialists, and up to two to three years for a Regional Director.

Other recruitment barriers cited by interviewees include: a lack of resources to recruit at the local level, remote office locations, lack of qualified Indian applicants, not being able to provide a career path for non-Indians, cultural issues, and negative perceptions of BIA.

Without redesigning the processes to address the above barriers, the expected retirement bubble will make the situation worse. Recruitment strategies recommended by GSA to all federal agencies include developing a brand image for the agency, developing brochures and literature reflecting this brand, sending younger employees as recruiters to college campuses, promoting on-line application, emphasizing Federal employment benefits, and training recruiters.[1] Gartner Group's recommendations for improving Government IT recruiting include developing a marketing strategy, reviewing and adjusting compensation packages, establishing a recruitment unit, advertising open positions, using executive search firms, recruiting on campus, broadening the recruitment pool, eliminating residency requirement or other obstacles, and automating the recruitment process[2]. Other literature reviewed indicates these also apply to non-IT related work.

Detailed Recommendations

2.3.1 Establish a Trust Management recruiting position to provide support and assistance to the regions, agencies, and field offices

A senior level Trust Management recruiting officer will help the current situation, but will also help to avoid large vacancies when baby boomers retire. The recruiting officer would not be positioned as an "enforcer," but as a helping hand to offices with significant Trust Management recruiting needs.

2.3.2 Redesign recruiting and hiring processes to support local activity

When redesigning, DOI should consider requiring all regional personnel offices to obtain Delegating Examining Unit (DEU) certification. DEU certification allows offices to prepare job postings for positions that will be opened to candidates outside of the civil service, without the assistance of OPM. Preparing these job postings without OPM assistance results in significant cost and time-savings for offices. The redesign team may also want to consider more widespread use of the Quick Hire process. This allows applicants to apply electronically for jobs posted in USA Jobs.

2.3.3 Investigate academic institutions for recruitment possibilities

DOI should visit with Campbell University, located in Buies Creek, NC. The Lundy-Fetterman School of Business there offers the only Trust Management degree program in the country. Private industry banks and institutions attend summer seminars at the university as well as recruit its students. DOI may find a talented pool of young, entry-level Trust Management candidates at Campbell.

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[1] GSA Office of Governmentwide Policy, Office of Real Property, "Succession Planning Guide," Summer 2001.

[2] Gartner Group, B.Keller, "Getting and Keeping Government IT Staff: Tactical Advice," Research Note February 28, 2001.

2.3.4 Examine policies involving merit promotions

The laws on Indian preference, specifically those involving merit promotions, should be examined. Interviewees indicated difficulty in attracting non-Indian candidates even when no qualified Indian candidates are available. Interviewees stated part of this difficulty is due to the inability of BIA to offer a career path for non-Indian hires. In this case, the department should investigate ways to offer career path opportunities.

3. Roadmap

The following Roadmap Gantt chart depicts the recommendations provided in this assessment section. Each recommendation in the chart reflects a relative timeframe and duration for planning purposes, and indicates an "@" for ongoing activities. More precise estimates and schedules must be produced as specific scope-of-work documents are defined. Work on recommendations that can start immediately are shown as starting in the "1Q" period. However, the DOI may have to delay the initiation of some recommendations due to resource constraints and varying priorities.

Recommendation	Duration (mos)	1Q 2Q 3Q 4Q 5Q 6Q 7Q 8Q 9Q 10Q 11Q 12Q	Outcomes & Benefits
O. 2.1 Appoint a Permanent Workforce Planning Manager	@		• Consistent workforce planning implemented by Trust Management organizations • Recognizes workforce planning as critical to the success of Trust Reform • Anticipates retirement surges to avoid staffing shortages • Meets staffing needs quickly
O.2.1.1 Appoint a strong, permanent leader to guide Department activities in the area of workforce planning for Trust Management positions	6		
O.2.1.2 Continue with the current staffing activities	6-9		
O.2.1.3 Keep the emphasis on overall workforce planning	@		
O. 2.2 Prepare Management for new Responsibilities and Skills	@		• Prepares and supports management to implement workforce planning strategies
O.2.2.1 Begin the cultural change process for management to understand their new workforce planning role and responsibilities	6		
O.2.2.2 Train Management on workforce planning processes, techniques, and tools	6		
O.2.2.3 Provide support to management to assist with workforce planning processes	@		
O.2.2.4 Investigate and invest in workforce planning tools that could streamline and automate the process	3-6		
O. 2.3 Redesign Practices to Include Central Recruiting	8		• Increases focus and emphasis on Trust Management recruiting as a priority
O.2.3.1 Establish a Trust Management recruiting position to provide support and assistance to the regions, agencies, and field offices	6		
O.2.3.2 Redesign recruiting and hiring processes to support local activity	3-6		
O.2.3.3 Investigate academic institutions for recruitment possibilities	3		
O.2.3.4 Examine policies involving merit promotions	*		

@ - Indicates ongoing efforts
* - More information needed to determine duration

Appendix A: Glossary and Acronyms

Term	Definition
ADM	Attorney Decision Maker
ALJ	Administrative Law Judge
ATB	Appraisal Technical Board
ATS	Applied Terravision Systems, Incorporated
AWG	Architecture Work Group or Working Group
Beneficiary	Any Native American tribe or individual whose Trust properties are being managed by the Department of the Interior.
BIA	Bureau of Indian Affairs
BIAM	Bureau of Indian Affairs Manual
The Indian Trust	Bureau of Indian Trust Assets Management
BLM	Bureau of Land Management
CCB	Change Control Board
CFR	Code of Federal Regulations
Communication Plan	A document that identifies the information and communication needs of the project stakeholders.
CLE	Continuing Legal Education
COTS	Commercial Off-the-Shelf
Development Plan	A document that addresses the development needs of individual team members.
DOI	Department of the Interior
Enterprise Architecture	An informational representation of a business enterprise consisting of process, application, data and technology components.
ERM	Electronic Records Management
FTE	Full Time Equivalent
FY	Fiscal Year
GAO	General Accounting Office
GIS	Geographic Information System
GPS	Global Positioning System
HLIP	High Level Implementation Plan
IIM	Individual Indian Monies
ILCA	Indian Land Consolidation Act
IPB	Indian Probate Judge
IRC	Information Resources Catalog
IPRL	Indian Probate Reinvention Lab
IRMS	Integrated Records Management System
IT	Information Technology
ITMA	Inter-Tribal Monitoring Association
IUAT	Integrated User Acceptance Test
LISLA	Land Information System for Leasing and Accounting
LRIS	Land Record Information System
LTRO	Land Title and Records Office
MAD	Management Accounting and Distribution
Metrics Plan	A document that identifies the measurements necessary to be collected to satisfy the

Term	Definition
	needs of the project sponsor and key stakeholders.
MOU	Memorandum of Understanding
MMS	Minerals Management Service
NAID	Native American Industrial Distributors
NARA	National Archives and Records Administration
NMC	Network Management Center
OCC	Office of the Comptroller of the Currency
OHA	Office of Hearings and Appeals
OHTA	Office of Historical Trust Accounting
OIRM	Office of Information Resource Management
OPM	Office of Personnel Management
OST	Office of Special Trustee for American Indians
OTFM	Office of Trust Funds Management
OTR	Office of Trust Responsibilities
OTR	Office of Trust Records
OTRM	Office of Trust Records Management
PL	Public Law
PMBOK	Project Management Body of Knowledge
PMC	Program Management Center
PMI	Project Management Institute
POS	Project Operating System
Process Governance	Mechanism that helps monitor, assess, and affect change to improve business process performance.
Project Charter	A document issued by senior management that provides the project manager with the authority to apply organizational resources to the projects activities.
Project Workbook	Collaborative workspace for all project team members to share project documents.
QA	Quality Assurance
QC	Quality Control
Quality Plan	A document that identifies the quality standards that are relevant to the project and determining how to satisfy them.
RDRS	Royalty Distribution and Reporting System
SLA	Service Level Agreement
SME	Subject Matter Expert (Expertise)
SOP	Standard Operating Procedure
SSA	Social Security Administration
TAAMS	Trust Asset and Accounting Management System
TAIP	Task Approval & Implementation Proposal
TFAS	Trust Fund Accounting System
TIME	TAAMS Information Migration Evaluation
TMIP	Trust Management Improvement Project
TPPD	Trust Program Performance Dashboard
TPMC	Trust Program Management Center
TPMT	TAAMS Project Management Team
TROC	TAAMS Regional Office Coordinator
USPAP	Uniform Standards of Professional Appraisal Practice

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Term	Definition
VA	Veteran's Administration
WBS	Work Breakdown Structure
Work Breakdown Structure	Project elements that organize and define the total scope of the project. Each descending level represents an increasingly detailed definition of a project's components.

Appendix B: Deliverable Summary and Assessment Approach

1. Assessment Report Deliverable Summary

At the request of the DOI, the schedule for TAAMS and BIA Data Cleanup were given priority and accelerated reporting. Accordingly, the assessments of those two projects, *TAAMS/BIA Data Cleanup, Interim Report and Roadmap*, were previously reported and published on November 12, 2001.

The schedule for the remaining assessments (9 HLIP Subprojects, 4 Court Breach Projects, Cadastral Survey and Overall Trust Reform) is as follows:

- *Trust Reform, Observations and Recommendations: "For Comments" Report; December 6, 2001*
- *Trust Reform, Final Report and Roadmap; January 24, 2002*

A separate assessment of Information Assurance (IA) was also conducted. A number of significant security vulnerabilities were identified related to the TAAMS and BIA Data Cleanup Projects. Those observations and recommendations were reported in a separate addendum *Interim Information Assurance Report and Roadmap for TAAMS and BIA Data Cleanup* published on November 12th. Similarly, some weaknesses were found in IA assessments of the TFAS and MMS interfaces and systems. Those observations and recommendations were submitted to the Office of the Special Trustee for American Indians in separate memos on November 27, 2001 and December 21, 2001 respectively.

2. Assessment Process

EDS' assessment process included a phased approach to providing the requested services. The engagement phases employed for each project assessment included Planning, Information Gathering, Analysis, Reporting, and Roadmap.

The EDS team followed a multi-step strategy designed to obtain the required project information, perform an objective review and analysis, and encourage the participation of all affected stakeholders. This strategy outlined below, was reviewed with the OST and, subsequently with Trust Management Improvement Project Steering Committee, OST Advisory Board, and the Inter-Tribal Monitoring Association.

- The EDS team members conducted approximately 200 interviews of key stakeholders to obtain their insight into Trust Reform. These interviews followed an objective instrument for change assessment based on A.T. Kearney's Change Assessment Framework. During these sessions, interviewees tested eight assumptions of change management and were encouraged to identify highlights and concerns associated with those assumptions. Appendix A lists the elements of the A.T. Kearney Change Assessment Framework and the results of the risk assessments.
- The EDS team produced interview summaries identifying key DOI comments and concerns regarding current status, and returned them to the participants for review. The

intent of these reviews was to ensure that EDS accurately captured their perspectives in each area investigated.

- The EDS team received applicable Department documentation to further understand and explore the areas to be reviewed. The team reviewed extensive documentation on each of the assessment projects. A complete list of documents reviewed is listed in Appendix B.

- The EDS team utilized objective references for its reviews such as EDS' Project Management Health Check PLUS. Health Check PLUS is based on the Project Management Institute's Project Management Body of Knowledge (PMBOK).

- Business and Technical Team Reviews were conducted to evaluate business policies and procedures and the means by which information technology resources were aligned with those procedures. Business Assurance reviews were conducted that focused on the extent to which core business processes were identified and protected against failures due to changes. Technical Assurance reviews were conducted to address the availability and reliability of information technology-based assets.

- Stakeholder feedback was solicited by circulating draft and interim reports to a limited distribution in order to verify findings, observations and resulting recommendations. All comments returned from those stakeholders were considered in subsequent draft reports. The philosophy of this approach was to eliminate surprises in the final report.

- Peer reviews were conducted within the EDS Team in order to provide cross checks and to identify common threads between projects. Those peer reviews consisted of team document reviews, internal presentations/discussions of observations and recommendations, and team workshops.

3. Recommendations Process

In order to develop specific, practical recommendations that would increase the likelihood of success, the engagement team needed to understand stakeholder expectations, program and subproject objectives, the current status of subproject activities and the means by which those activities were being governed. The process below describes the steps and activities that were followed in developing the recommendations included in this report.

- Information gathered by EDS was analyzed and findings identified. The summary findings were reviewed to identify those issues with the greatest impact on the projects and on Trust Reform.
- Observations and recommendations for each subproject were identified, drafted and reviewed in an EDS internal team workshop. The key recommendations to be reported were agreed upon in the workshop.
- The high-level recommendations were then broken down into practical, detailed recommendations that identify specific actions that, if implemented, will improve the effectiveness of Reform-related initiatives.

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4. Roadmap Process

In the "Trust Reform, Observations and Recommendations: "For Comments" Report published December 6, 2001, EDS identified recommendations that, if implemented, will position the DOI to achieve Trust Reform objectives. These recommendations together with the feedback received by January 11, 2002 formed the foundation of the roadmap. The steps below describe the assessment team's approach to developing that roadmap.

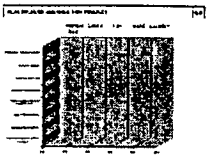
- Primary recommendations were distilled and mapped by report reference to the detailed description.
- Start times were estimated with consideration to logical sequence, priorities, and high-level dependencies.
- An order-of-magnitude assessment was performed to define an approximate duration of each recommendation.
- The outcomes and benefits for each recommendation was summarized to clarify the priorities and objectives.

5. Information Gathering and Assessment Tools

The engagement team used several information gathering and assessment tools:

A.T. Kearney ABCD Change Assessment Interview Framework:
Derived from A.T. Kearney's change assessment methodology, this framework captures executive- and director- level insight into the objectives, methods, capabilities and resources available to implement enterprise-wide changes.

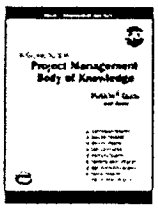
EDS Program Health Check *PLUS*®:
Based on the Project Management Institute Autohealthcheck Survey, the Health Check *PLUS*® enables EDS Project Management Consultants to capture and objectively evaluate the strategies, methods and tools used to monitor and control program activities.



EDS Information Assurance Assessment Process:
Integrated questionnaires and processes that evaluates the extent to which core processes and data are protected against unauthorized access or modification.

EDS Team Review Frameworks:
Technical Review frameworks define agendas used to explore and evaluate the extent to which program/project scope and requirements are defined and matched to business and technical designs, produced components, test plans, training efforts and deployment activities.
Business Review frameworks define agendas that combine general business issues (for example organizational readiness and business continuity) with a detailed examination of the policies, procedures and resources committed to program activities. Business and technical frameworks are grounded in EDS' System Life Cycle 3.0 and the Project Management Institute's Project Management Body of Knowledge (see below).

PMI Project Management Body of Knowledge (PMBOK):
PMBOK establishes a standard against which program/project management activities are measured. The functional areas addressed are: Project Integration, Scope, Time Management, Cost/Procurement Management, Quality, Human Resource Management, Communications and Risk.



EDS RightStep®:
An EDS proprietary methodology for aligning a client's Information Technology investments with long-range business objectives and strategies.

RightStep®

EDS System Life Cycle 3.0®:
Consistent with industry standards, EDS' System Life Cycle methodology enables the assessment team to evaluate the extent to which current information technology policies, methods and tools reliably and economically support client requirements.

Appendix C: Candidate Business Solutions

Based upon the interviews and analysis, the following business solutions should be considered as candidates to support Trust processes:

Beneficiary Relationship Management

Commonly referred to as CRM (Customer Relationship Management). These business solutions often include a class of COTS software packages or modules within Enterprise Resource Planning (ERP) packages to build profiles of the constituents with which an enterprise interacts, and track the interactions themselves. In coordination with revised or new processes for servicing Beneficiaries, such a capability would allow the Trust to better understand the commonalities and uniqueness of its Beneficiaries, and provide the information to tailor interactions based upon each Beneficiary's preferences, rights, and authorizations.

Buy-back

A Buy-back solution is needed to support a business initiative for the voluntary repurchase of fractionated interests in Trust lands and real assets. This most likely would need to be a new business process supported by a custom-developed system, identifying fractionated ownerships, capturing an appraised valuation of such an interest, supporting the tendering of offers for repurchase, tracking repurchase authorization, and reporting overall metrics for the entire population of fractionated interests and their consolidation progress.

Digital Asset Management

Digital Asset Management processes and systems support imaging and digitizing source media; such as titles, conveyances, court reports, and as other rich media. They are capable of supporting visual editing to make pictures, maps, or documents more readable; applying metadata for knowledge capture and access indices to the underlying media; provide publishing, rights management, and authorized accessibility over the web or through secure networks. A system for Trust Management could support capturing some of the source document information to create a more capable records system, while allowing decentralized entities the ability to retain the source documents, should they so desire. These systems can also support publishing subsets of documents to Tribes should they become compacted or contracted and need access, as well as supporting web rendering of the documents to authorized parties.

GIS

GIS (Geographic Information Systems) are used for the mapping of natural resources, topography, land usage, rights, economic information, and many other layers of information relating to the tracts of land in a geographic area. Use of a GIS system for land management across the regions covered by the Trust would provide a common mechanism to provide consistent information on the land under Trust, while providing the ability to support unique information needs and processes required by each geographic area. The Yakama Tribe model utilizes a GIS system to interrelate different local and regional Trust land-use functional requirements in a single system, which can be integrated with Trust-wide or other DOI agency systems. This system, while originally fulfilling cadastral survey and environmental requirements, has wider applicability if a common set of standards or software to support related business processes can be established for deployment in other locations and regions.

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Workforce Management

A Workforce Management System in conjunction with a Workforce Management Plan would provide a central repository to support and track required skill and position needs, recruiting, development and training, certifications, workforce planning, and retention of people.

Performance Reporting

The purpose of Performance Reporting is business metrics definition, capture, and reporting. Leading practices for large private sector enterprises spanning multiple geographies and organizational departments, frequently define measures to manage each key business process. The detail transactional or functional systems then aggregate information into metrics captured by a performance reporting system. This Performance Reporting system is then used as a management tool similar to a vehicle "Dashboard", highlighting the performance of the underlying business, the areas of the business that are performing well, and the areas to which management needs to direct its attention.

Trust Land Management

Currently, there are no systems or repositories of information providing Trust executives or regional managers visibility to comprehensive information as to how the land in the Trust is being managed. A Trust Land Management system would support that business need and provide aggregated, detail information from specific tract and geographic area land uses to support an overall Performance Measurement process or system in managing the land. A Trust Land Management system would also provide metrics for assessing the Trust's performance in fulfilling its fiduciary responsibilities in capturing and documenting the Beneficiary interactions and objectives for intended use of the land, as specified in the Trust Reform Act of 1994.

Workflow Management

Workflow process management systems are specifically designed to identify workload routing and volumes. A Workflow Management System, coordinated with a workforce plan and other supporting systems would provide Trust resources the visibility to a prioritized set of tasks which need to be accomplished, and can electronically attach the various documents and source information required to complete that task.

Appendix D: Executive and Director Interview Results

1. Introduction

This appendix contains the results of the ABCD Change Assessment interviews conducted with Departmental executives and directors.

Many of the key DOI messages were obtained during interviews with key Department executives and directors involved in the Trust Reform initiatives. A structured framework, based on A.T. Kearney's ABCD Change Assessment template, enabled interviewees to examine eight characteristics of the TAAMS / BIA Data Cleanup projects, and of the Trust Reform initiative:

1. **Scope and Objectives.** The scope and objectives of the program (or projects) are agreed and will remain consistent with the legislative and judicial agenda for Trust Reform.

2. **Project Governance.** The current governance structure, processes and plans will be adequate to successfully deliver the program.

3. **Executive Alignment and Commitment.** Senior management and project sponsors will remain committed to, and engaged in, all key aspects of the program.

4a. **Organizational Alignment.** The goals and status of the program(s) are understood throughout the organization.

4b. **Resource Alignment.** Sufficient and appropriate resources will be available to be applied to the program.

5. **Measurement Systems.** Suitable measurement systems will be established to ensure that program benefits are realized and sustained.

6. **Methods and Processes.** Development and delivery teams will successfully leverage consistent processes and approaches to deliver Trust Reform.

7. **Organizational Readiness.** All participating organizations will be trained and equipped to ensure that business benefits are achieved and sustained.

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2. Understanding the Scoring Summaries

Each of the above assumptions is expected to be true if an organization is experiencing healthy, constructive change. As participants addressed each assumption, they were asked to evaluate:

- Likelihood: the extent to which the assumption was currently, and was likely to remain, true (an A for likelihood indicates that the assumption is, and is likely to remain true; a D indicates that the assumption is currently, or is likely to become false); and

- Sensitivity: the importance, in terms of overall success, that should be assigned to ensuring that the assumption remained true (an A for sensitivity indicates that the project will, in all likelihood, be successful regardless of whether this assumption is true; a D indicates that it is critical to the success of the program that the assumption remain true).

The engagement team has graphed a scoring summary for each major program assumption identified above. The scoring summary illustrates the perceptions of all participating organizations relative to each program characteristic. Small turquoise circles represent individual responses, grouped as follows:

- Executive perceptions – Assistant Secretary level and their direct reports.

- Director perceptions – Regional and Deputy Regional Directors and their direct reports, Program Managers, Subproject Managers and key representatives from third party contractors.

- Bureau of Indian Affairs (BIA) perceptions

- Office of Special Trustee for American Indians (OST) perceptions

- Other perceptions - Non-BIA and non-OST participants, such as BLM, MMS and third-party contractors.

In addition, each Scoring Summary includes EDS' observed status (plotted using EDS' corporate logo) and each group's summary evaluation – the arithmetic average – (plotted using a large, pale blue circle).

Plotting the summary perceptions of each group enables EDS' engagement team to determine the extent to which information relevant to key program characteristics is being consistently shared within and across all participating organizations. This information is then included in EDS' observations.

3. Interpreting the Assessments

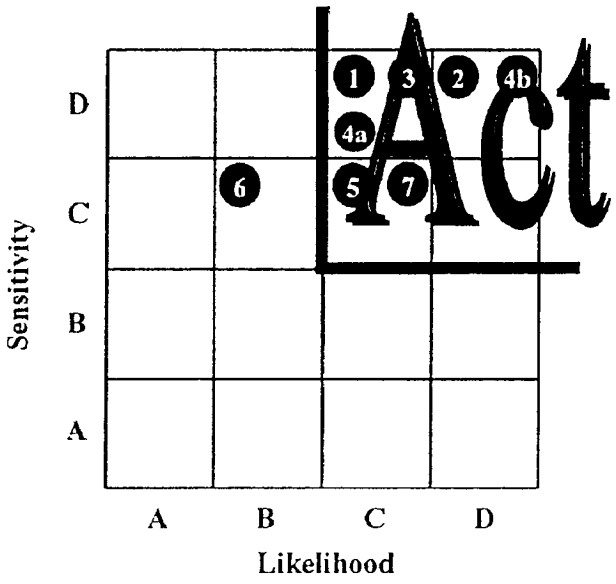
Program characteristics that were described, or observed, to be in the upper right hand quadrant need to be acted upon immediately in order to assure a reasonable likelihood of success.

Characteristics observed to be in the lower half of the chart are generally accepted to be less important to program success; characteristics found on the left side of the chart are generally accepted to be contributing to, rather than detracting from program success.

Summary Assessment for Trust Reform

The ABCD Assessment Diagram below summarizes EDS' observed status of Trust Reform and their current contributions.

ABCD Assessment Diagram



The assessment diagrams for each of the eight ABCD categories are found in the sections that follow.

EDS - EDS Observed Status

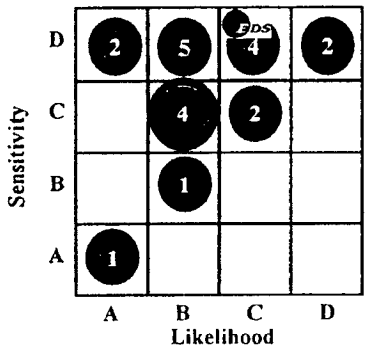
1 - Count of Individual Responses by Assessment Category

- Group's Summary Response

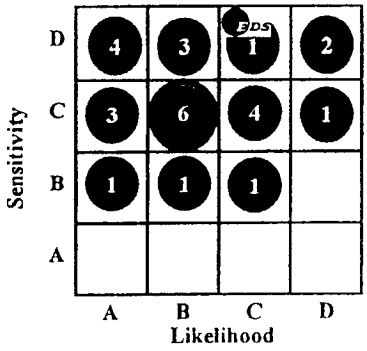
Characteristic #1 - Scope and Objectives

The objectives and scope of the program(s) are agreed and will remain consistent with the political agenda.

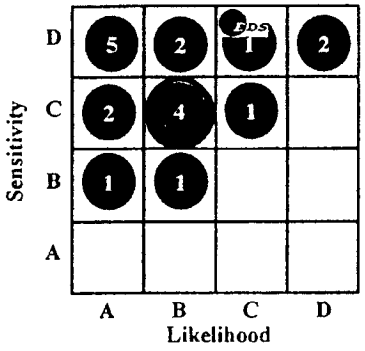
Executive Scoring



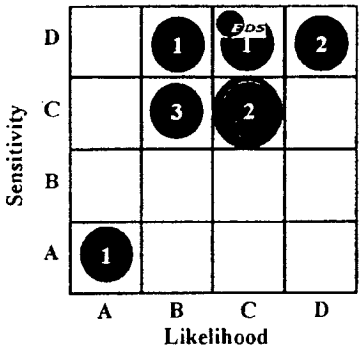
Director Scoring



BIA Scoring



OST Scoring



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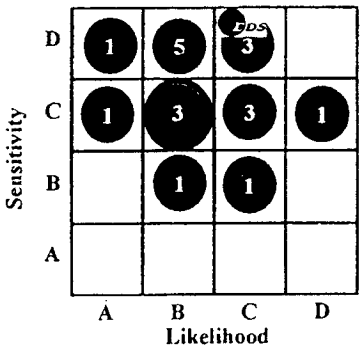

Characteristic #2 – Project Governance

The current governance structure, processes and plans will be adequate to successfully deliver the program(s).

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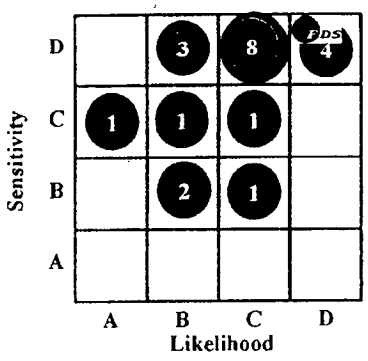
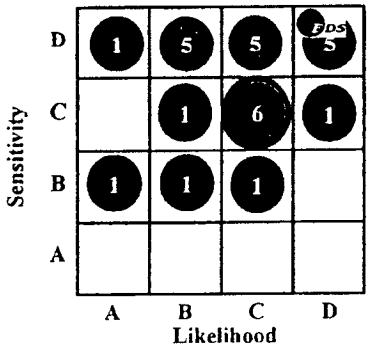


Director Scoring



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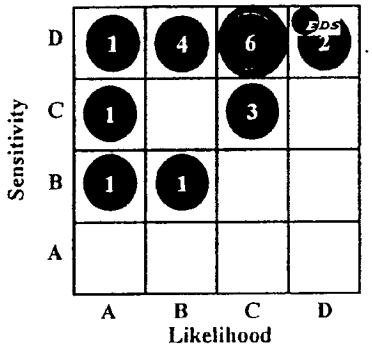

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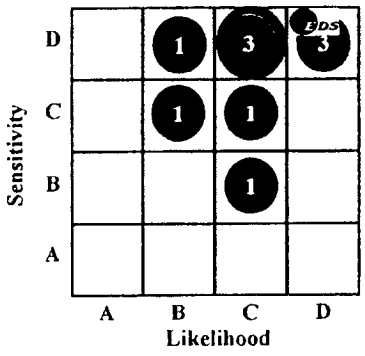

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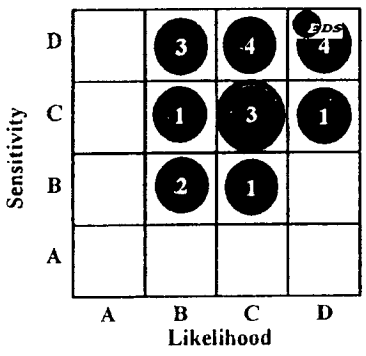
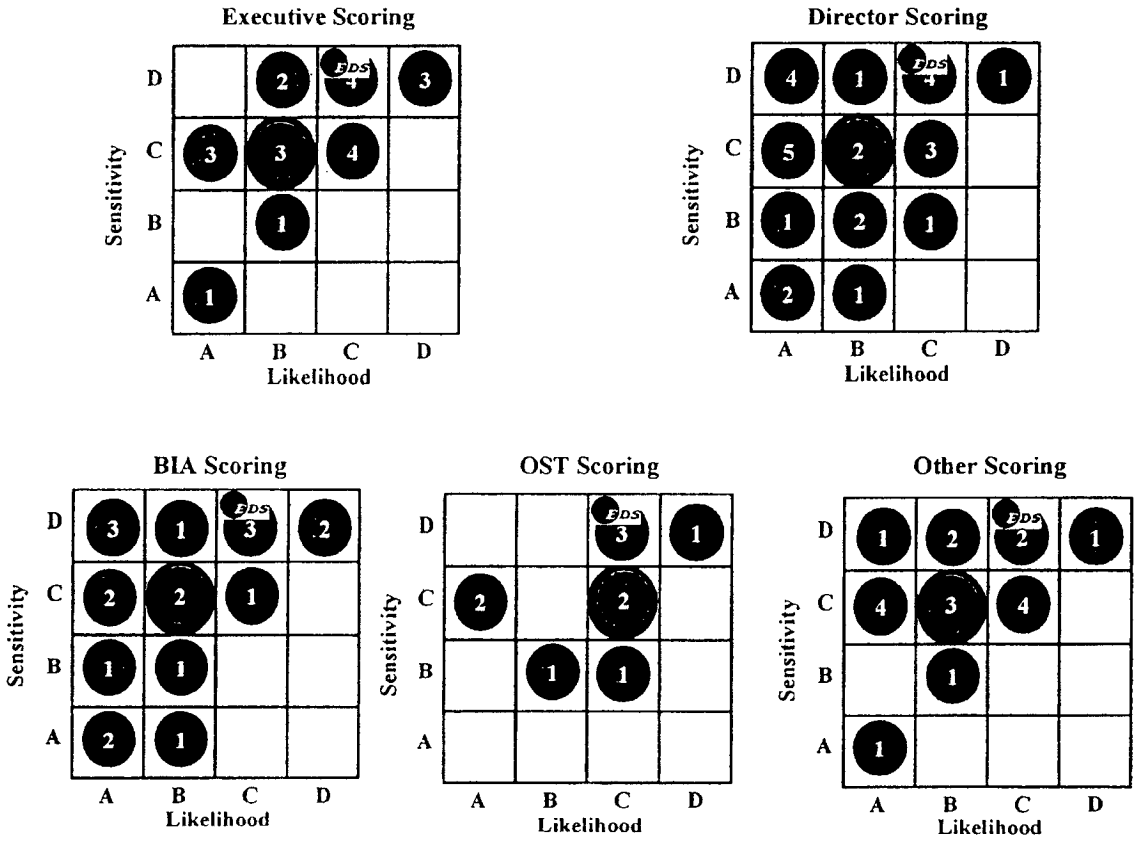


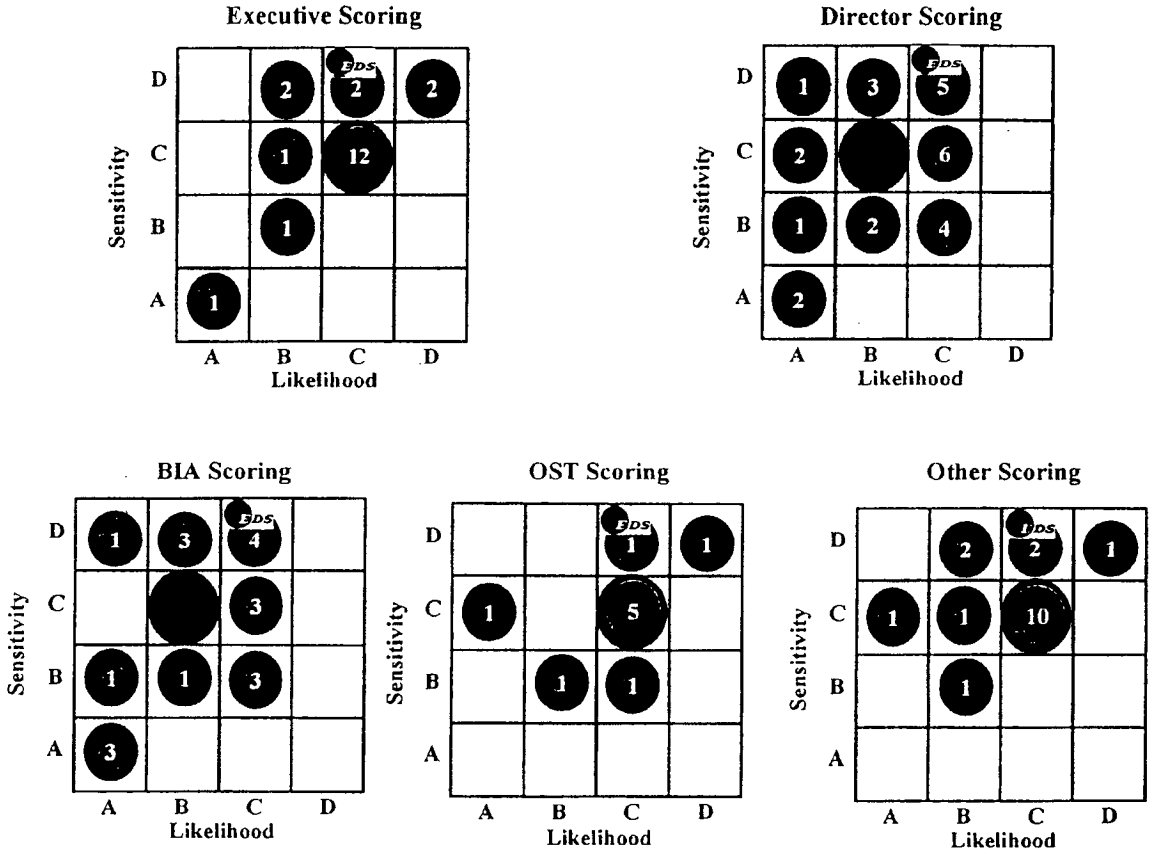
Characteristic #3 – Executive Alignment and Commitment

Senior management and project sponsors will remain committed to, and engaged in all key aspects of the change program(s).



Characteristic #4a – Organizational Alignment

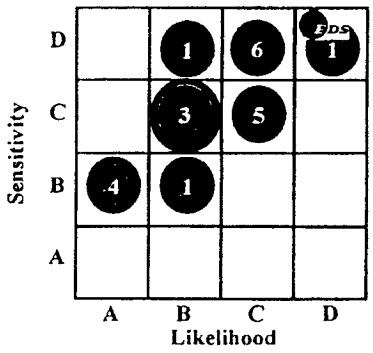
The goals and status of the program are understood and communicated.



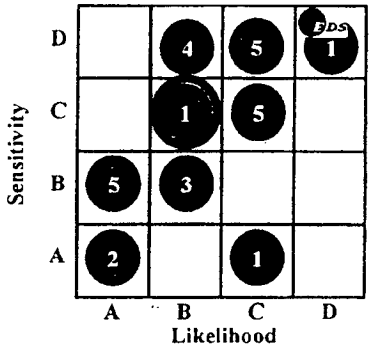
Characteristic #4b – Resource Alignment

Sufficient and appropriate resources will be available to the program(s).

Executive Scoring



Director Scoring



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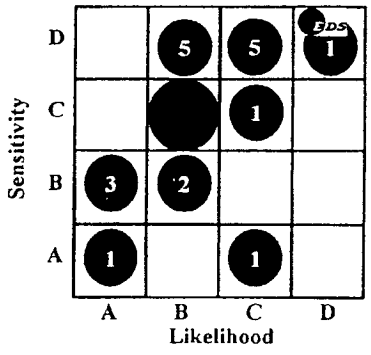

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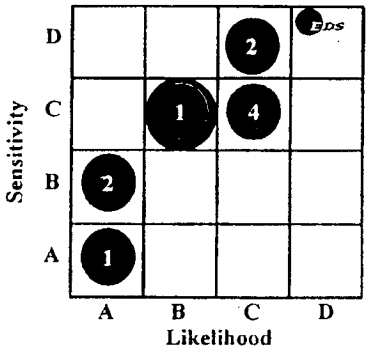

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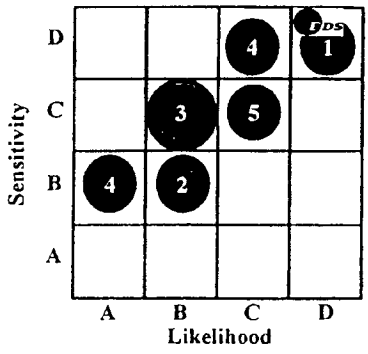
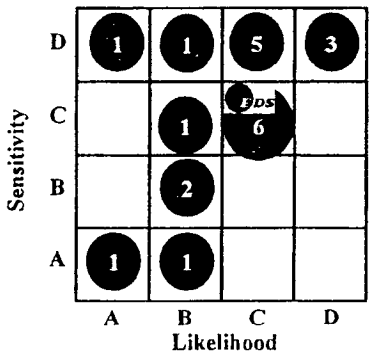


Characteristic #5 – Measurement Systems

Suitable measurement systems will be established to ensure that program benefits will be realized and sustained.

Executive Scoring



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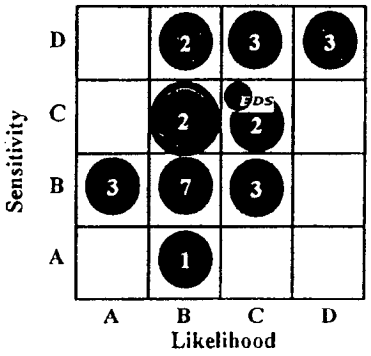

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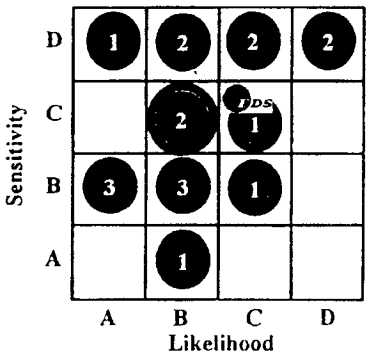

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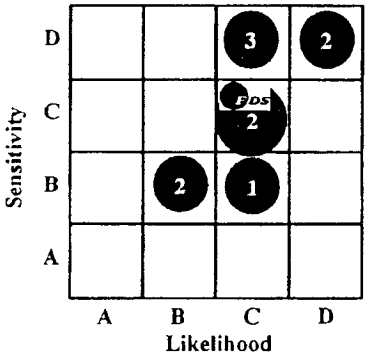

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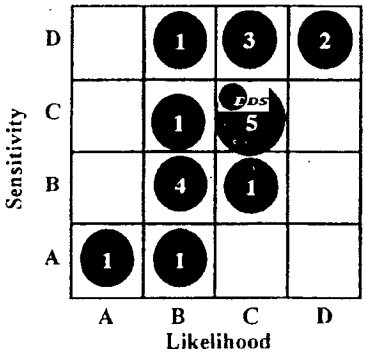
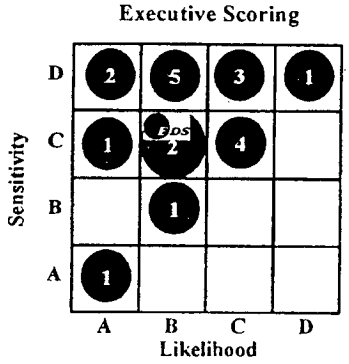
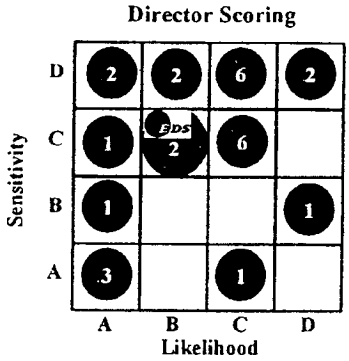
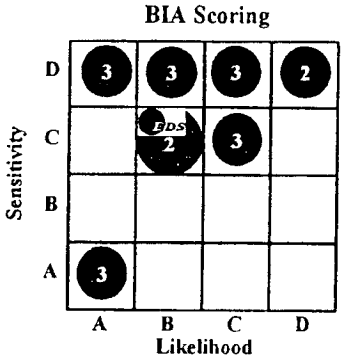


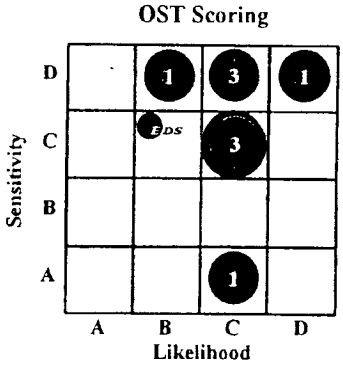
Characteristic #6 – Methods and Processes

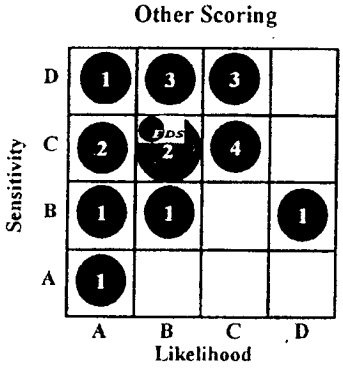
Development and delivery teams will successfully leverage consistent methods / approaches to deliver Trust Reform.











Characteristic #7 – Organizational Readiness

All participating organizations will be trained / equipped to ensure that business benefits are achieved and sustained.

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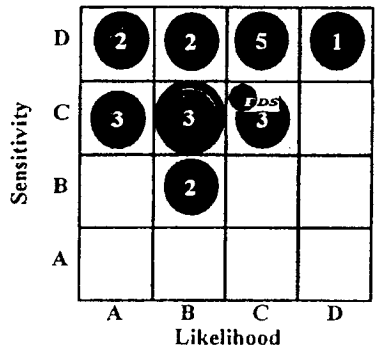
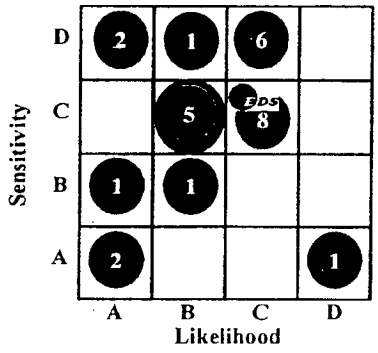


Director Scoring



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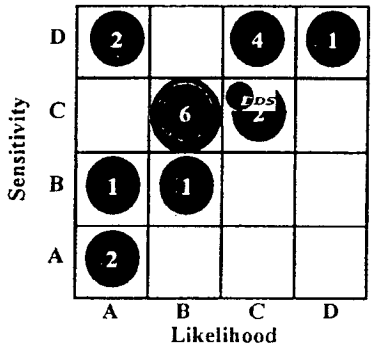

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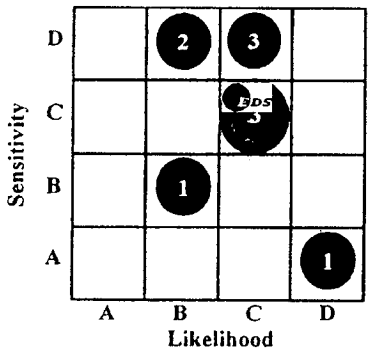

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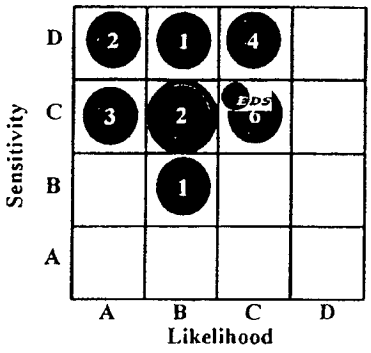

Appendix E: Document List

Number	Category	Document Description
0200.0	Overall Trust Reform	DOI - Executive Order 3231: Subject: Establishment of the Office of Historical Trust Accounting
0200.1	Overall Trust Reform	DOI - Executive Order 3232: Subject: Trust Reform
0200.2	Overall Trust Reform	DOI - Executive Order 3235: Subject: Establishment of the Office of Indian Trust Transition
0300.0	Overall Trust Reform	Memorandum: To: Special Trustee for American Indians etc., From: Secretary of the Interior, Subject: Action regarding Trust Reform and Historical Accounting, Date: Jul 10, 2001
0300.1	Overall Trust Reform	Memorandum: To: Special Trustee for American Indians etc., From: Assistant Secretary-Indian Affairs, Subject: Realignment of Bureau of Indian Affairs (BIA) Appraisal Function to Office of the Special Trustee (OST), Date: Jul 10, 2001
0400.0	TAAMS / BIA Data Cleanup	Trust Management Improvement Project, High Level Implementation Plan, US - DOI July 1998
0400.1	TAAMS / BIA Data Cleanup	Trust Management Improvement Project, High Level Implementation Plan, US - DOI Revised and updated February 29, 2000
0500.0	Internal Controls, Business Systems and Architecture	Trust Management Improvement Project, High Level Implementation Plan, Internal Controls: I. Inventory and Catalogue Internal Controls In TFAS, TAAMS, and MMS Systems, Internal Controls-I, August 2000
0600.0	Appraisal	MEMORANDUM - To: Office of the Special Trustee, From: Acting Director, Trust Policies and Procedures, Subject; Re-organization of Appraisal Program, Date; Aug 08, 2001
0600.1	Appraisal	MEMORANDUM - To: Arthur E Gary, etc..., From: Tom Slonaker, Subject: Revised Appraisal Report, Date: August 15, 2001
0700.0	Appraisal	Executive Office of the President, Office of Management and Budget, OMB Bulletin No. 92-06, To the heads of Executive Departments and Establishments, Subject: Guidance on Real Estate Appraisal Standards and Practices, Date: March 16, 1992
0700.1	Appraisal	MEMORANDUM - USDOI - Real Estate Appraisal, To: All Area Directors, etc., From: Director, Office of Trust and Economic Development, Subject; State appraisal certification and licensing required by Title XI of the 1989 Financial institutions Reform, Recovery, and Enforcement ACT (FIRREA)
0700.2	Appraisal	MEMORANDUM - USDOI - BIA - To: Division Heads and Branch Chiefs, Central Office, etc.., From: Commissioner, Subject: Establishment of new Branch of Real Estate Appraisal, Date: March 2, 1962
0700.3	Appraisal	MEMORANDUM - USDOI - BIA - To: All Regional Directors, From: Deputy Commissioner of Indian Affairs, Subject: State Certificate of BIA Appraisers, Date: Nov 15, 1999
0700.4	Appraisal	MEMORANDUM - USDOI - BIA - To: All Regional Directors, BIA, From: Deputy Commissioner of Indian Affairs, Subject: Standard Appraisal Forms, Date: Nov 22, 1999
1001.0	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Records Management: Yorok Tribe; August 21, 2001

Number	Category	Document Description
1002.0	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Bia/IARM Records Management Activities; September 17, 2001
1003.0	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Trust Records Management Information; September 2001
1004.0a	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Office of the Special Trustee for American Indians: Office of Trust Records Status Report; July 2001
1005.0	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Trust Matters: Volume 1, Issue 4 May, 2001
1006.1	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Indian Affairs Record Management: On the Road with the Indian Affairs Records Management Program
1006.2	Breach 2: Retention / Destruction of Documents & Record Improvement Management	An Employee's Quick Guide to Records Management: On the Record with the Indian Affairs Records management Program
1006.3	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Managing Electronic Mail: On the Record with the Indian Affairs Records Management Program
1006.4	Breach 2: Retention / Destruction of Documents & Record Improvement Management	Personal Papers: On the Record with the Indian Affairs Records Management Program
1007.0	TAAMS \ BIA Data Cleanup	DOI - Office of the Special Trustee for American Indians, Office of Trust Risk Management
1008.0	TAAMS \ BIA Data Cleanup	DOI - OST, Office of Trust Risk Management; Interagency Procedures Handbook between BIA and OST: Management of Trust Funds Derived from Assets and Resources on Trust and Restricted Indian Land; DRAFT June 21, 2001
1009.0	Project Management	BIA - Office of Trust Responsibilities, Data Cleanup Summary Report 7/25/2001
1011.0	TAAMS \ BIA Data Cleanup	DOI - OST - Needs Analysis Project Presentation 4/25/1997
1012.0	TAAMS \ BIA Data Cleanup	DOI - OST - Needs Analysis Project Final Report by MACRO International, Inc. April 7, 1997
1012.2	TAAMS \ BIA Data Cleanup	DOI - OST - Needs Analysis Project Final Report - Appendix Part 2 by MACRO International, Inc. April 7, 1997
1013.0	TAAMS \ BIA Data Cleanup	OTFM Documented Issues Reguarding TAAMS
1014.1	TAAMS \ BIA Data Cleanup	DOI - BIA - Division of Contracts and Grants Administration: Trust Asset and Accounting Management System (TAAMS) Volume I, December 1, 1998
1014.2	TAAMS \ BIA Data Cleanup	DOI - BIA - Division of Contracts and Grants Administration: Trust Asset and Accounting Management System (TAAMS) Volume II, December 1, 1998
1015.0	TAAMS \ BIA Data Cleanup	OTFM'S TAAMS Documentation on Multiple Issues 4/14/2000
1016.0	Project Management	Project Workbook: Project Management Functions
1017.0	TAAMS \ BIA Data Cleanup	Office of Trust Responsibility: Data Cleanup Meeting 8/27-29/200; IRMS Anomaly Reporting

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Number	Category	Document Description
1018.0	TAAMS \ BIA Data Cleanup	TAAMS Conversion Data Cleanup Support: June 2001 (Reporting Period May 21 - June 17, 2001) Monthly Site Status Report by DataCom Sciences, Inc. Delivered July 13, 2001
1018.1	TAAMS \ BIA Data Cleanup	TAAMS Conversion Data Cleanup Support: July 2001 (Reporting Period June 18 - July 29, 2001) Monthly Site Status Report by DataCom Sciences, Inc. Delivered August 14, 2001.
1018.2	TAAMS \ BIA Data Cleanup	TAAMS Conversion Data Cleanup Support: August 2001 (Reporting Period July 30 - August 26, 2001) Monthly Site Status Report by DataCom Sciences, Inc. Delivered September 17, 2001.
1019.0	TAAMS \ BIA Data Cleanup	TAAMS Conversion Process
1020.0	Overall Trust Reform	OST - Trust Systems and Projects (TS&P) Meeting High Level Implementation (HLIP) Sub-Project Meeting, October 2-3, 2001 Albq NM. (BLUE FOLDER)
1021.0	Overall Trust Reform	BIA Regions - Contact Information
1021.1	Overall Trust Reform	Office of the Special Trustee, Office of Trust Funds Management: Field Operations and Agency IIM Offices, DIRECTORY, September 10, 2001.
1021.2	Overall Trust Reform	Southern Plains Regional offices: Field / Agency / Tribal Offices
1021.3	Overall Trust Reform	Western Regional Offices: Agency/Field Office Probate Realty Specialist & Clerk Positions
1023.1	Training	Booz-Allen & Hamilton Study Document (Part 2)
1023.2	Training	Booz-Allen & Hamilton Study Appendix (Part 2)
1024.0	Missing Information	US - DOI - OST, Planned Accounting Approach ~~July~~ November 14, 2000 (11/15/2000)
1025.0	Overall Trust Reform	*High-Velocity Culture Change A Handbook for Managers*, Price Pritchett & Ron Pound
1025.1	Overall Trust Reform	Team Reconstruction Building A High Performance Work Group During Change, Price Pritchett & RonPound
1027.0	Overall Trust Reform	DOI, OST: Trust Systems and Projects (TS&P) Meeting with High Level implementation Plan (HLIP) Subproject Managers; Sheraton Old Town, Albuquerque, NM. October 2-3, 2001
1028.0	Overall Trust Reform & TAAMS	Draft: Analysis and Update Risk Management Plan, Trust Asset and Accounting management System BIA, September 2001. From Donna Erwin
1028.1	Overall Trust Reform & TAAMS	Analysis and Update Risk Management Plan, Trust Asset and Accounting management System BIA, July 2001.
1030.0	TAAMS \ BIA Data Cleanup	National Institute of Standards and Technology: Computer Security Expert Assist Team (CSEAT)
1031.0	TFAS	SEI Investments 2000 Annual Report and Cover Letter
1035.1	Training	Upper Mohawk, Inc. Trust Foundations Course Material (parts 1) (Training)
1035.2	Training	Upper Mohawk, Inc. Trust Foundations Course Material (parts 2) (Training)
1035.4	Training	Upper Mohawk, Inc. Trust Foundations Course Material – Course Materials
1036.0	Training	Upper Mohawk, Inc. Training Framework (6/30/2000) (Training)
1037.0	Policy and Procedure	Interagency Procedures Handbook - draft
1038.0	Training	Macro Study, Proposed Sites for Obtaining Training Information from Trust and Realty Employees (4/19/99) (Training)

Number	Category	Document Description
1039.0	Training	Macro Study, Training Plan Approach for HLIP (4/19/99) (Training)
1040.0	Appraisel	US - DOI - BIA, Real Estate Services Appraisal Handbook, October 1998
1041.0	General Project Documentation	A Study of Management and Administration: The Bureau of Indian Affairs, National Academy of Public Administration (NAPA Report)
1042.0	Workforce Planning	Booz-Allen Trust Management Survey
1043.0	Workforce Planning	Personnel Bulletin 01-06 Workforce, Staffing, and Individual Development Planning for Trust Management Activities
1044.0	Workforce Planning	Workforce Planning Project Plan (2/2000)
1045.0	Workforce Planning	BIA FY 2002 Staffing Plan for Trust Management Positions (Sept. 2001)
1046.0	Workforce Planning	Right People, Right Place, Right Time, A guide to Workforce Planning in the U.S. Department of the Interior
1047.0	Workforce Planning	Workforce Planning Instruction Manual (Workforce Planning)
1048.0	Workforce Planning	Human Resources Strategic Plan (WP) (business card)
1049.0	Training	Upper Mohawk, Inc. Training Plan (8/28/2000) (Training)
1050.0	TAAMS \ BIA Data Cleanup	Data Cleanup, Trust Program Records Clean Up And Conversion to TAAMS, Print Date: 10/21/2001
1051.0	Policy and Procedure	Trust Management Improvement Project - Report to the Trust Policy Council - Review of Regulations and Program Guidance, BIA April 2001
1052.0	Policy and Procedure	Instructions for Reviewing and Developing Policies and Procedures for Discharging the Department's Indian Trust Responsibilities (5/9/2000) (P&P)
1053.0	Policy and Procedure	Analysis of Cross-Cutting Issues and Problems (7/31/2001)(P&P)
1054.0	Policy and Procedure	Trust Principles (4/28/2000)
1055.0	General Project Documentation	OTFM flyer (FAQs on OTFM)
1056.0	General Project Documentation	Trust Matters, Volume 1, issue 4
1057.0	General Project Documentation	Memo from Special Trustee on Staff Interviews on Trust Reform (8/1/01)
1057.1	General Project Documentation	Memo from Special Trustee on EDS Interviews on Trust Reform (8/1/01)
1058.0	General Project Documentation	US GAO, Report to Congressional Requestors, Indian Trust Funds, September 2000, Improvements Made in Acquisition of New Asset and Accounting System but Significant Risks Remain, (GAO/AIMD-00-259)
1060.0	Policy and Procedure	Trust Policies & Procedures Budget FY 2002 & 2003
1061.1	Workforce Planning	So. Plains Region Strategic Plan A
1061.2	Workforce Planning	So. Plains Region Strategic Plan B
1062.0	Training	Train Needs Survey Results - OST/Div. Of Field Operations
1063.0	Training	General Organizational Chart for DOI
1063.1	Training	General Organizational Chart for OTFM
1063.2	Training	General Organizational Chart for Division of Field Operations
1063.3	Training	General Organizational Chart for BIA
1064.0	Workforce Planning	Position Description
1065.0	Workforce Planning	DOI Department Manual, Personnel Manager, Departmental Personnel Program - Promotion and Internal Placement
1066.0	Workforce Planning	44 BIAM 335 - Promotion and internal placement

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Number	Category	Document Description
1067.0	Probate	BIA - *Probate Processing Handbook*, June 2001, Draft 3 - Work in Progress - For Discussion Purposes Only
1068.0	Appraisal	Uniform Standards of Professional Appraisal Practice 2001 Edition by Appraisal Standards Board
1069.0	Overall Trust Reform	Excerpt from *Comptrollers Handbook for Fiduciary Activities*, September 1990.
1070.0	TFAS	SAS No. 70 Report for FSTN, Inc. on SEI Investments' Controls and Tests of Operating Effectiveness for TRUST 3000, SMAC, TRADE 3000, INVEST 3000 and EBR for the period November 1, 1999 through October 31, 2000 by PriceWaterhouseCoopers
1071.0	TFAS	OTFM - TFAS Reference Guide
1072.0	TFAS	Procedure for TFAS Code Update Requests - DRAFT - 10/23/2001
1073.0	TFAS	Sample of SEI Issues List
1074.0	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Application Architecture January 13, 2001 US - DOI
1074.1	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI
1074.1a	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX I - PROJECT STRUCTURE
1074.1b	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX II - PRINCIPLES
1074.1c	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX III - PRINCIPLES
1074.1d	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX IV - INFORMATION RESOURCE CATALOG
1074.1e	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX V - DATA ARCHITECTURE
1074.1f	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX VI - APPLICATION ARCHITECTURE
1074.1g	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX VII - TECHNOLOGY ARCHITECTURE

Number	Category	Document Description
1074.1h	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX VIII - BASELINE APPLICATION INTEGRATION ARCHITECTURE
1074.1i	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan and Project Summary, August 14, 2001 US - DOI APPENDIX IX - REFERENCES
1074.2	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Data Architecture, November 29, 2000 US - DOI
1074.3	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Implementation Strategy, June 30, 2001 US - DOI
1074.4	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Current System and Technology: Information Resources Catalog, June 30, 2000 US - DOI
1074.5	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Business Model, September 29, 2000 US - DOI
1074.6	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Technology Architecture, May 14, 2001 US - DOI
1074.7	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Enterprise Architecture Planning Project, Transition Plan & Project Summary, August 14, 2001 US - DOI
1075.0	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture, Business Model, September 29, 2000, US - DOI
1075.1	Computer and Business Systems Architecture	Trust Management Improvement Project, Computer and Business Systems Architecture Framework Plan, February 2000, US - DOI (Earlier Version?)
1076.0	TAAMS \ BIA Data Cleanup	US General Accounting Office (GAO) Report to Congressional Requesters, Indian Trust Funds, Challenges Facing Interior's Implementation of New Trust Asset and Accounting Management System, July 14, 1999, (GAO/T-AIMD-99-238)
1077.0	Computer and Business Systems Architecture	Trust Management Technical Oversight Committee, Information Architecture Brief, April 11, 2000 by David Shearer
1080.0	TAAMS \ BIA Data Cleanup	US - DOI - BIA Data Cleanup Support: September 14, 2001, Prepared for: EDS, Prepared by: DataCom Sciences, Inc.
1081.0	TAAMS \ BIA Data Cleanup	Bureau of Indian Affairs, TAAMS Update, Chester D. Mills and Bruce Maytubby, June 25, 2001, BIA TAAMS Project Management Office
1082.0	TAAMS \ BIA Data Cleanup	Report on the Review of the TAAMS System by Jim Parris, August 21, 2001
1083.0	TAAMS \ BIA Data Cleanup	Monitoring Activity Report on the Office of Trust Funds Management, July 24, 2001
1084.0	Missing Information	"Establishing Written Policies and Procedures for Collecting from Outside Sources Missing Information Necessary to Render an Accurate Accounting of the IIM Trust" ,
1085.0	Project Management	US DOI - BIA, Deployment and Implementation Plan for the Trust Asset and Accounting Management System TAAMS, Version 1.3, May 2000

Number	Category	Document Description
1086.0	Project Management	US DOI - BIA, Project Management Plan for the Trust Asset and Accounting Management System TAAMS, Version 1.2, August 1, 1999, Revised July 10, 2000
1087.0	Project Management	US DOI - BIA, Risk Management Plan for the Trust Asset and Accounting Management System TAAMS, Version 1.3, Revised July 2000
1088.0	Project Management	US DOI - BIA, TPMT Database Regional Reports Southwest Region, TROC Meeting, July 19, 2001
1089.0	Project Management	US DOI - BIA, Draft - Project Management Plan for the Trust Asset and Accounting Management System TAAMS, Version 2.0, July 16, 2001
1090.0	Project Management	US DOI - BIA, Draft - Configuration Management Plan for the Trust Asset and Accounting Management System (TAAMS), Version 2.0, April 2001
1091.0	Project Management	NAID, Org Chart for Trust Project Management Team
1092.0	Project Management	Determining the Volume of Data Cleanup, Draft in Progress by DataCom Sciences, Inc., September 25, 2001
1093.0	Project Management	Position Description for TAAMS Project Manager
1094.0	Project Management	Project Plan: TAAMS Integrated Schedule 070201 by BIA (Filename: TAAMS Integrated Schedule 070201.mpp Filter: Incomplete Tasks
1094.1	Project Management	Project Plan: TAAMS Integrated Schedule 07-03-2001 by BIA (Filename: TAAMS Draft Integrated Schedule 07-03-2001.mpp Filter: Incomplete Tasks)
1094.2	Project Management	Project Plan: TAAMS Integrated Schedule 07-03-2001 by BIA (Filename: TAAMS Draft Integrated Schedule 07-03-2001.mpp Filter: All Tasks)
1094.3	Project Management	Disk Label A-3 Containing Files: TAAMS Risk Analysis and Update 0105.pdf; Nancy.zip: TAAMS Draft Integrated Schedule 07-02-2001b.mpp, TAAMS Draft Integrated Schedule 07-02-2001a.mpp, TAAMS Integrated Schedule 070201.mpp, TAAMS Draft Integrated Schedule 07-19-2001.mpp
1094.4	Project Management	Disk Label C-1 Containing Files: System Test Plan Title&Realty.mpp, TAAMS Software Release for May 2001.mpp
1094.5	Project Management	Disk Label B-5 1 of 3 Containing Files: B_5 TAAMS Draft Integrated Schedule 07-03-2001.zip; B_5 TAAMS Draft Integrated Schedule 07-03-2001.mpp
1094.6	Project Management	Disk Label B-5 2 of 3 Containing Files: TAAMS Integrated Schedule 070201.mpp
1094.7	Project Management	Disk Label B-5 3 of 3 Containing Files: TAAMS Integrated Schedule101000 - Title Deployment History.mpp
1095.0	Internal Controls	*Risk Management Program*, 9/21/00, US - DOI - Office of the Special Trustee for American Indians, Office of Trust Risk Management
1096.0	Internal Controls	*Risk Management Handbook for Indian Trust Operations*, 11/30/00, US - DOI - Office of the Special Trustee for American Indians, Office of Trust Risk Management
1097.0	Internal Controls	*Internal Control - Integrated Framework;* Evaluation Tools September 1992 by Committee of Sponsoring Organizations of the Treadway Commission

Number	Category	Document Description
1097.1	Internal Controls	*Internal Control - Integrated Framework;* Executive Summary, Framework, Reporting to External parties September 1992, Addendum to "Reporting to External Parties" May 1994 by Committee of Sponsoring Organizations of the Treadway Commission
1098.0	Workforce Planning	Position Description - Realty Specialist
1099.0	Training	DOIU Online Courses
1100.0	Training	DOIU roster of FY 2001 training attendance
1101.0	Training	Canon School Brochure and Information
1101.1	Training	Canon School Brochure and Information - Web Page
1102.0	Training	OPM A Guide to Strategically Planning Training and Measuring Results
1103.0	Training	Office of Trust Responsibilities Proposal for Trust Services Center
1104.0	Training	Website information on National Trust School (ABA)
1105.0	Training	Website information on NAID
1106.0	Policy and procedure	MMS Listing of Manuals and Handbooks
1107.0	Policy and procedure	BLM Listing of Manuals and Handbooks
1108.0	Policy and procedure	Federal Managers Financial Integrity Act Binder
1109.0	Project Background	Strategic Plan - Summary of Trust Management Problems, Need for Action and Special Trustee's Strategic Plan Recommendations
1110.0	Training	DOIU University Brochures
1110.1	Training	US - DOI - University, FY2002 Class Schedule
1110.2	Training	US - DOI - Executive Assistant Certificate Program (EACP), (Pamphlet)
1110.3	Training	US - DOI - Denver Learning Center, "Where Learning is for Life", (Pamphlet)
1110.4	Training	US - DOI - Financial Management Intern Program (Pamphlet)
1110.5	Training	US - DOI - University Course Evaluation
1111.0	Probate & Appraisal	US - DOI - BIA Final Report Pawnee Pilot Project, Washington DC, April 25, 2001.
1112.0	Probate & Appraisal	US - DOI - BIA Indian Land Consolidation Act Training Materials, October - December, 2001, Phoenix, Arizona
1113.0	Probate & Appraisal	BIA - Great Plains Regional Office, Management, Accounting, and Distribution Program (MAD) Documentation
1113.1	TAAMS \ BIA Data Cleanup	BIA - Great Plains Regional Office, Salary Table
1116.0	Internal Controls	Summary/ latest status of 147 Audits, Reports, Findings by Internal Controls/OST/DOI, IG Audits Prior to 1988 (Listing of Material Weaknesses/Findings): (82)
1117.0	Internal Controls	Office of Trust Risk Management, Budget Briefing, August 8, 2001 (FY 2003)
1118.0	Internal Controls	US - DOI, Assistant Secretary - indian Affairs, Office of American Indian Trust, Risk Management plan, May 15, 2001
1119.0	Internal Controls	US - DOI Office of Trust Risk Management, Final Report, BIA Eastern Oklahoma Region, Wewoka Agency, September 18, 2001
1120.0	Internal Controls	US - DOI Office of Trust Risk Management, Final Report, Assistant Secretary - Indian Affairs, Office of American Indian Trust, September 5, 2001
1121.0	Internal Controls	DOI - Office Inspector General Report Findings - Prior to 1992, Contractor Report

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		Report
1122.0	Internal Controls	Audit: Congressional Reports Prior to 1992 - SYNAR Report
1123.0	Internal Controls	Draft IG Audits : Updated as of February, 1999
1124.0	Internal Controls	GAO Audits : Updated February, 1999
1125.0	Internal Controls	IG Audits Post 1988:
1126.0	Internal Controls	Early Office of Inspector General Audit Report:
1128.0	Internal Controls	Letters of Inquiry to Various Offices
1129.0	Internal Controls	Completed and Proposed Site Visits, Indian Business Operations Team, As of 12/4/01, Prepared for OST/OTRM by MRM/IBO; Filename: BIA Functions.xlsLocations - Functions - All
1130.0	Internal Controls	Completed and Proposed Site Visits, Indian Business Operations Team, As of 12/4/01, Prepared for OST/OTRM by MRM/IBO; Filename: VISITS-JIM FORMAT.xlsTotal Percentages - All
1131.0	Internal Controls	Executive Summary, October 10, 2001, Office of Trust Risk Management
1132.0	Internal Controls	Risk Management Field Reviews, Executive Summary, Attachment 1, As of 10/12/2001
1133.0	Internal Controls	Office of Trust Risk Management, Draft Training Plan, September 20, 2001, Executive Summary Attachment 6
1134.0	Internal Controls	OST - Office of Trust Risk management Procurement Plan, FY 2002
1136.0	Internal Controls	OTRM - Cash Management - Results of Reviews
1142.0	Business Systems & Architecture	Navajo Regional Office Profile
1143.0	Business Systems & Architecture	DOI - Lands Under Jurisdiction of the BIA as of December 31, 1996
1144.0	Business Systems & Architecture	Spreadsheet of Land by Region and ownership
1145.0	Business Systems & Architecture	Map of Navajo Region by Agency
1146.0	Business Systems & Architecture	Draft - Procedure for TFAS Code Update Requests 5/24/01
1147.0	TAAMS \ BIA Data Cleanup	BIA - Notice to Indian Land Owners, Indian Land Consolidation Act Amendments of 2000, P.L. 106-462
1148.0	TAAMS \ BIA Data Cleanup	MRM Status as of 06/01
1148.1	TAAMS \ BIA Data Cleanup	US - DOI Minerals Management Services (MMS), Royalty Management Program, MRM Critical Milestones, 07/23/01
1149.0	TAAMS \ BIA Data Cleanup	US - DOI Minerals Management Services (MMS), Minerals Revenue Management, Reengineering for the 21st Century, Project Status April 1, 2001
1151.0	TAAMS \ BIA Data Cleanup	US General Accounting Office (GAO) Report to Congressional Requesters, Indian Trust Funds, Interior Lacks Assurance That Trust Improvement Plan Will Be Effective, April 1999, (GAO/AIMD-99-53)
1152.0	TAAMS \ BIA Data Cleanup	Organizational Charts for BIA Northwest Region, August 31, 2001 (TR)
1153.0	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: TAAMS - Organizational Chart
1153.1	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Monthly Status Reports
1153.2	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Outstanding_Job_Sheets
1153.3	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Artesia Task Management January 8, 2001
1153.4	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: TAAMS New Release Request
1153.5	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Skills Inventory

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1153.6	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Data Dictionary
1153.7	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Support Center Ticket Process
1153.8	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Draft - Support Center Procedure Manual
1153.9	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: System Test Plan For TAAMS Application Software, February 9, 2001 and Results
1153.10	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Student Roster for TAAMS Training, Example Certificate and blank evaluation.
1153.11	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: TAAMS Accounting Specifications June 13th, 2000, Revision 1.1 (July 11, 2000)
1153.12	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Monetary Ownership in TAAMS May 25th, 2000, Revision 1.1 - July 11th, 2000
1153.14	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Memorandum: To: Deputy Commissioner Director, TMIP; From: TAAMS Program Manager; Subject: TAAMS Issues database, Date: July 17, 2000
1153.16	TAAMS \ BIA Data Cleanup	TAAMS information from ATS: Memorandum: TAAMS action status by Topic/Status
1154.0	Training	DOI - BIA - Training Plan for the Trust Asset and Accounting Management System (TAAMS) Version 1.2, 09 July 2001
1155.0	Overall Trust Reform	US General Accounting Office (GAO) Report to the Chairman, Subcommittee on Environment, Energy and Natural Resources, Committee on Government Operations, House of Representatives, Financial Management Focused Leadership and Comprehensive Planning Can Improve Interior's Management of Indian Trust Funds, September 1994, (GAO/AIMD-94-185)
1156.0	Overall Trust Reform	US General Accounting Office (GAO) Report to the Committee on indian Affairs, U.S. Senate, Financial Management BIA's Tribal Trust Fund Account Reconciliation Results, May 1996, (GAO/AIMD-96-63)
1157.0	Overall Trust Reform	US General Accounting Office (GAO) Testimony, Financial Management Indian Trust Fund Strategic Plan, July 30, 1997, (GAO/T-AIMD-97-138)
1158.0	Overall Trust Reform	US General Accounting Office (GAO) Testimony, Financial Management Interior's Effort to Reconcile Indian Trust Fund Accounts and Implement Management Improvements, June 11, 1996, (GAO/T-AIMD-96-104)
1159.0	Overall Trust Reform	US General Accounting Office (GAO) Report to the Secretary of the Interior, Financial Management Recommendations on Indian Trust Fund Strategic Plan Proposals, November 1997, (GAO/T-AIMD-98-37)
1160.0	Cadastral	Title: Modernization of the Indian Trust Cadastral Records
1161.0	Probate & Appraisal	DRAFT 11/05/01 - Criteria for Prioritizing Surveys of Indian Trust Land
1162.0	Probate & Appraisal	AAO Appraisal Request Log
1163.0	Probate & Appraisal	Example of Cadastral Survey submittal information
1164.0	Cadastral	Cadastral Survey Funding Distribution Formula Exhibit #1
1165.0	Cadastral	Discussion Paper - Topic: Transitioning from Cadastral Survey Project Offices to "Land Information Infrastructure" Project Offices on Indian Tribal Lands, Date: November 5, 2001 bdahl
1166.0	Probate & Appraisal	LETTER - BIA Southwest Regional Office, Appraisal Services Section, Thursday, October 04, 2001, PROBATES: The Southwest Regional Appraisal Services office has not received an Appraisal Request from the 9 agencies or Self-Governance Tribal Realty Programs since November

Number	Category	Document Description
		1994.....
1167.0	Probate & Appraisal	DRAFT - Office of Trust Risk Management Issue Paper, Lack of Legal and Accurate Surveys of Indian Trust Lands may Affect the Accuracy of Trust Fund Disbursements to Indian Owners and Delay the Economic Development and Use of Indian Lands, July 2001
1168.0	Probate & Appraisal	Great plains Regional Office FY 2001/4th Quarterly Report, 07/01/01 - 09/30/01, (INFORMATIONAL)
1169.0	Probate & Appraisal	www.iccindianenterprises.com - Newsletter Date: 1/25/2001, (Example)
1170.0	Probate & Appraisal	Explanation: "My understanding is that you look at the Date of Death of the person and how much was in the account on that date. Etc...
1171.0	TAAMS \ BIA Data Cleanup	ATS Data Center, Standard Operating Procedures
1172.0	TAAMS \ BIA Data Cleanup	Trust Asset and Accounting Management System (TAAMS); Title
1173.0	TAAMS \ BIA Data Cleanup	Server Based Computing White Paper, Presented to Dom Nessi, Department of Interior BIA
1174.0	TAAMS \ BIA Data Cleanup	Trust Asset and Accounting Management System (TAAMS) Disaster Prevention and Recovery Plans and Procedures, Version 1.0, October 13, 2000
1175.0	Information Assurance	TAAMS Data Cleanup Project, DataCom Sciences, Inc. August 20, 2001
1176.0	Information Assurance	IRS Technical manual - Privacy Impact Assessment Version 1.3
1177.0	Information Assurance	Emails and Flow Charts
1178.0	Information Assurance	Bureau of Indian Affairs Architecture Planning - Current Wide Area Network Architecture, January 18, 2001a Draft
1179.0	Information Assurance	IRM Bulletin 2001-0005 Subject System Warning Banner (Received from John Curran)
1179.1	Information Assurance	TAAMS User Access Security Policies, Guidelines, and Procedures, Version 1.0, final, July 6, 2001
1179.2	Information Assurance	TAAMS Security System Plan, Version 1.0, Draft, February 15, 2001
1179.3	Information Assurance	BIA IT Security Program
1179.4	Information Assurance	DOI Introduction to Information Technology Security Seminar
1180.0	Information Assurance	IA TAAMS General Stuff/Documentation
1181.0	Information Assurance	IA TFAS General Stuff/Documentation
1182.0	Information Assurance	CSEAT Presentation
1183.0	Information Assurance	ATS Contract Section C - Statement of Work
1184.0	Information Assurance	OTFM Network Diagram
1185.0	Information Assurance	TAAMS Security Access Working Group Meeting, 6 and 7 February 2001; 15 and 16 February 2001
1186.0	Information Assurance	MRM documentation PART 1
1186.1	Information Assurance	MRM documentation PART 2
1187.0	Business Systems & Architecture	DOI - Trust Asset and Fund Management Business Cycle
1188.0	Business Systems & Architecture	BLM's Strategy to Improve Information Assets
1189.0	Business Systems & Architecture	DOI - LTR Cost-Performance Table: As-Is
1190.0	Business Systems & Architecture	Trust Management Business Models 10/10/96

Number	Category	Document Description
1191.0	Overall Trust Reform	GAO - Major Management Challenges and Program Risks, DOI, (GAO-01-249)
1192.0	Overall Trust Reform	Gov Audits Standards: Yellow Book
1500.0	TAAMS \ BIA Data Cleanup	Diagram – Artesia Task Management January, 2001
1501.0	TAAMS \ BIA Data Cleanup	Diagram – Artesia and BIA Conversion Timeline
1502.0	TAAMS \ BIA Data Cleanup	Diagram – TAAMS Title by Applied Terravision, Inc.
1503.0	TAAMS \ BIA Data Cleanup	Diagram – TAAMS Realty by Applied Terravision, Inc.
2000.0	General Project Documentation	H.R. 4833 Act to Reform Indian Trust Funds
2001.0	Overall Trust Reform	First Report of the Court Monitor on
2002.0	Overall Trust Reform	Trust Management Improvement Project: Second Report of the Court Monitor on TAAMS Computer System, April 16, 2001
2002.1	Overall Trust Reform	Trust Management Improvement Project: Second Report of the Court Monitor on TAAMS Computer System, April 16, 2002; Tabs Related to Court Monitors Report.
2003.0	Overall Trust Reform	Trust Management Improvement Project: Third Report of the Court Monitor on BIA Data Cleanup, July 11, 2001
2004.0	Overall Trust Reform	Trust Management Improvement Project: Fourth Report of the Court Monitor on Overall Trust Reform, September 2001
2004.1	Overall Trust Reform	Supplemental Report Amending the Second and: Fourth Reports of the Court Monitor
2006.1	General Project Documentation	Extract from Quarterly Report #6
2107.0	Overall Trust Reform	Trust Management Improvement Project: Quarterly Status Report to the Court Number Seven (May 1, 2001 to July 31, 2001) Includes motion for extension.
2108.0	General Project Documentation	Trust Management Improvement Project: Quarterly Status Report to the Court Number Eight (January 16, 2002)
2200.0	Overall Trust Reform	Motion to show cause why interior defendants and their employees and counsel should not be held in contempt for violating court orders.
2201.0	Overall Trust Reform	Cobell Trial Transcript 8/20/99
2202.0	Overall Trust Reform	Cobell Trial Transcript Dallas 2/2001
2203.0	Overall Trust Reform	Eloise Pepion Cobell v. Bruce Babbitt, Secretary of the Interior, Civil No. 96-1285 (RLC)
2300.1	Overall Trust Reform	Extract from Cobell vs. Norton (Breach # 4 - Workforce Planning)
2301.0	TAAMS \ BIA Data Cleanup	Law Links (http:\\resource.lawlinks.com), Comprehensive Resources Linking the Legal Community, Chapter 42 - American Indian Trust Fund Management Reform
3010.0	Industry Standards	Tribal & BIA Priorities Survey (Comparison) 9/27/2001
3011.1	Industry Standards	The Justification of IT Training
3011.2	Industry Standards	Best Practices in End-User Training
3011.3	Industry Standards	The Dollars and Sense of IT Professional Training
3011.4	Industry Standards	Training for IT Managers: Why Now?
3011.5	Industry Standards	Scenario Planning for the Training Organization, 2003
3012.1	Industry Standards	10 Measures of Human Capital Management
3012.2	Industry Standards	Making Human Capital Measurements Add Up
3012.3	Industry Standards	Workforce Planning: Cure for Government's Aging IT Staff
3012.4	Industry Standards	Getting and Keeping Government IT Staff: Tactical Advice

Number	Category	Document Description
3012.5	Industry Standards	Developing an IS Staffing Model
3012.6	Industry Standards	Key Metrics for Supporting Enterprise Applications
3013.0	Workforce Planning	DOI University Web Page
3014.0	Workforce Planning	GSA Succession Planning Guide
3033.0	TAAMS \ BIA Data Cleanup	Press Release: US. Department of the Interior, Office of the Secretary, "Secretary Norton Announces Plan to Improve Management of indian Trust Assets"; Dated November 15, 2001
3033.1	TAAMS \ BIA Data Cleanup	"Reorganization to Improve Indian Trust Assets Management"
3034.0	Records Retention	*"Building the Archives of the Future"*, D-Lib Magazine, February 2001, Volume 7 Number 2 (ISSN 1082-9873)
3035.0	Records Retention	"*Configuring and Turning Archival Storage Systems*" by San Diego Supercomputer Center and Gleicher Enterprises, LLC; National Archives and Records Administration home page (www.nara.gov) Electronic Records Archives (ERA) Program, National Archives and Records Administration (NARA),
3036.0	Records Retention	"*Towards Self-Validating Knowledge-Based Archives*" by San Diego Supercomputer Center; National Archives and Records Administration home page (www.nara.gov) Electronic Records Archives (ERA) Program, National Archives and Records Administration (NARA),
3037.0	Probate and Appraisal	*Restatement of the Law Third, Restatement of the Law Trusts, Prudent Investor Rule*, The American Law Institute
3037.1	Overall Trust Reform	*Wealth Management The Financial Advisor's Guide to Investing and Managing Client Assets by Harold R. Evensky*
3038.0	Project Management	*"A Guide to the Project Management Body of Knowledge (PMBOK Guide)"*, 2000 Edition, Project Management Institute, Newtown Square, Pennsylvania USA
3039.0	Policy and Procedure	Achieving 100% Compliance of Policies and Procedures, by Stephen Page, September 2000.
3041.0	Overall Trust Reform	Memorandum: To: To HLIP and Breach Trust Personnel, From: Special Trustee for American Indians, Subject: EDS Interviews on Trust Reform, August 1, 2001
3041.1	Overall Trust Reform	Memorandum: To: Secretary, etc..., From: Special Trustee for American Indians, Subject: Staff Interviews on Trust Reform, August 1, 2001
3043.0	Appraisal	www.appraisal foundation.org - USPAP 2001 - Ethics
3043.1	Appraisal	www.appraisal foundation.org - USPAP 2001 - Forward, History and Origin