

U.S. DEPARTMENT OF THE INTERIOR – INDIAN AFFAIRS



Final Report: Examination, Evaluation, and Recommendations for Support Functions



March 2012

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Section I. Executive Summary

Contract number D11PD40426 provides support to the United States Department of the Interior (DOI, Interior, the Department), Office of the Assistant Secretary - Indian Affairs (Indian Affairs) through the preparation of a multi-phase evaluation relating to the administrative support structure for the Bureaus of Indian Affairs (BIA) and Indian Education (BIE). Bronner Group, LLC (Bronner), a woman-owned small business with nearly 25 years of past performance supporting the public sector was selected by the Department for this engagement in June 2011.

This final report represents Bronner's recommendations for the Indian Affairs Support Services organization. The recommendations contained in this report, as requested by the government's statement of work, are based on a comprehensive analysis of peer agency best practices and the adaptability of said practices to Indian Affairs.



Background

The Department of the Interior has a unique responsibility among federal agencies to administer a broad array of programs and services for American Indians and Alaska Natives. Under treaties signed by the United States of America, Tribal Nations are entitled to the services and resources administered by the Department through the Bureaus managed by the Assistant Secretary - Indian Affairs.



Similar to other federal agencies, the organizational structure of Indian Affairs has changed and evolved over time. Tribal Leaders reported that some of the government's changes have resulted in more responsive service to the Tribes, while others have resulted in the creation of additional challenges. One organizational change that continues to generate substantial debate was the decision in 2004 to centralize the management of Indian Affairs administrative support services in the Headquarters Office. Resources that were previously managed by the BIA Regional Directors were, at the time of the centralization, realigned into a new organization led by a Deputy Assistant Secretary for Management (DAS-M). The DAS-M organization was created, according to interviews with DOI and Indian Affairs personnel, to mitigate a lack of internal controls that existed under the earlier de-centralized model. Conversely, many Indian Affairs employees suggest that the centralization needlessly created a new bureaucracy that restricts information sharing and reduces the efficiency of support to Tribal Nations.

One organizational change that continues to generate substantial debate was the decision in 2004-2005 to centralize the management of Indian Affairs administrative support services in the Headquarters Office.

In early 2011, senior Department officials concluded that an impartial analysis of the DAS-M organization was necessary to determine the appropriate series of “next steps” for the Indian Affairs organization. A team of executives from within Indian Affairs was established to oversee the analysis and monitor the performance of the independent contractor, Bronner.

During the first phase (task) of the independent analysis conducted by Bronner, a baseline of DAS-M operations was prepared for the Department's review. In addition, feedback was sought from key groups regarding the structure and performance of administrative support services in Indian Affairs. Those groups included:

- ⇒ **Tribal Leaders**
- ⇒ **Senior Department Officials**



- ⇒ **BIA and BIE Executives, Managers and Employees**
- ⇒ **DAS-M Executives, Managers and Employees**

It is significant to note that, while external feedback was provided from a range of sources, much of that feedback was related to an overall frustration with the federal resource environment and not to the organizational structure of support services within Indian Affairs. Internal feedback, however, revolved around the following core themes:

PROGRAM-SUPPORT DISCONNECT

Organizations within Indian Affairs – including DAS-M, BIA and BIE – do not coexist and coordinate effectively.

LACK OF COMMUNICATION

Whether due to organization structure or lack of infrastructure, Indian Affairs does not circulate information effectively.

POOR INITIAL IMPLEMENTATION

Regardless of its present effectiveness, the centralization of support services into DAS-M was poorly executed.

These themes were particularly emphasized during interviews with BIA and BIE personnel, many of whom articulated a strong frustration with the perceived “overreaction” that fueled the centralization and creation of DAS-M. The Directors of BIA and BIE each articulated a need for greater control over administrative support services in order to maximize the effectiveness of programs and services administered in American Indian and Alaska Native communities.

The DAS-M employees also offered a range of feedback, much of which illustrates an organization frustrated by many of the same federal rules and regulations that confront all agencies equally, including Interior and Indian Affairs. While the baseline analysis uncovered a series of “growing pains” and related challenges within DAS-M, it also revealed progress being made on some issues, including better responsiveness to financial questions and some improved internal controls.



Overall, the first phase report presented the Department with a clear statement concerning the current organization of support services: **it is not the ideal solution for Indian Affairs.**

Recommendations and Next Steps

With a completed baseline analysis and initial conclusions that alternative options should be considered for the administrative support structure, Bronner’s review included the examination of peer agency best practices. To give senior Department officials a range of established options for support services, the following organizations were reviewed:



Indian Health Service



Fish and Wildlife Service



Executive Office for the United States Attorneys



National Park Service



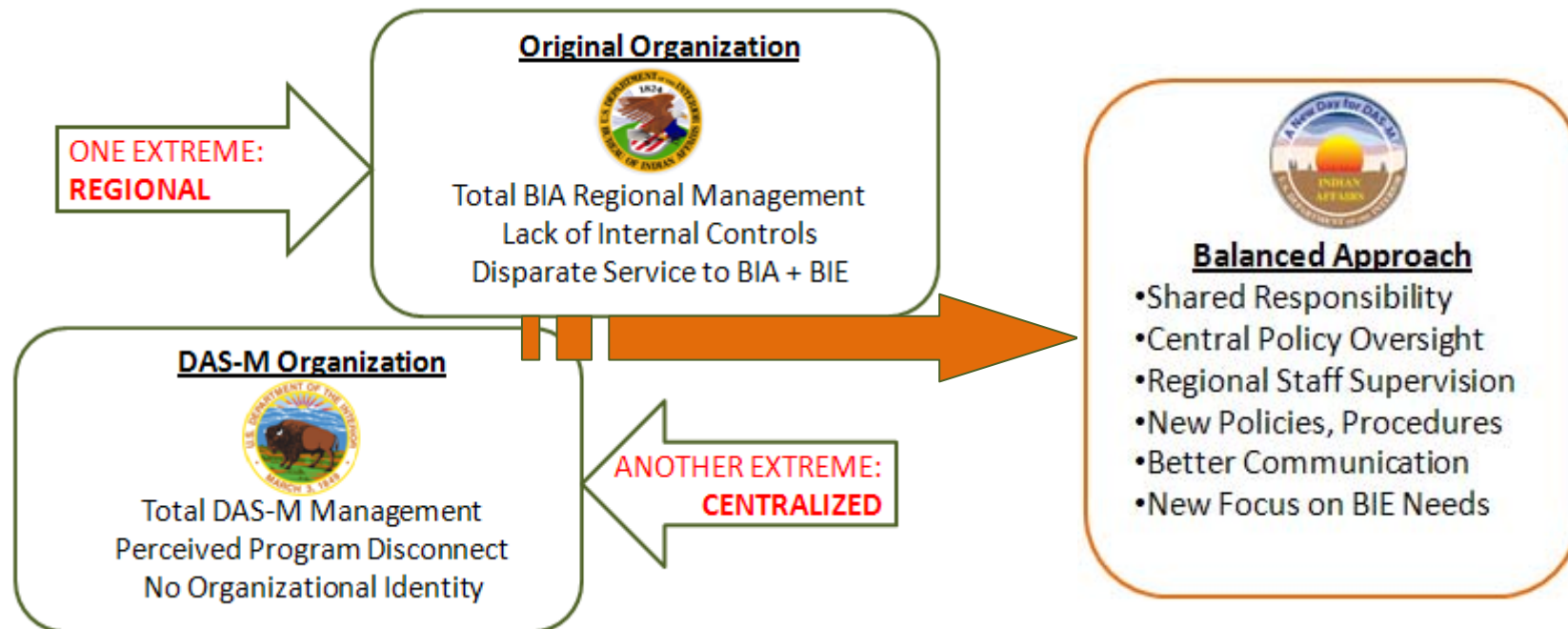
Forest Service

In addition to peer agency best practices, Bronner’s team of federal administrative support experts leveraged feedback from senior Department officials, including the Deputy Secretary, the Assistant Secretary – Indian Affairs, as well as from Indian Affairs executives, managers and employees. A clear point of emphasis



emerged that should govern any contemplated changes to the Indian Affairs organization: the “all or nothing” approach that governed the initial establishment of DAS-M must be avoided. To the extent changes contained in this report are contemplated by Department officials, the changes should be implemented carefully to avoid the confusion and frustration that resulted from the DAS-M centralization.

In the context of recommended alternatives outlined in this report, Bronner’s team has concluded that the recommend end-state of support service operations for Indian Affairs should capitalize on the strengths and weaknesses of the two most recent models: complete decentralization and complete centralization. Accordingly, a balanced organizational approach is recommended for Indian Affairs moving forward.



This final report establishes, on a functional basis, a series of recommended alternatives and next steps for the support services organization within Indian Affairs. The recommended theme for the potential realignment – “A New Day for Indian Affairs” – is intended to illustrate the Indian Affairs’ interest in moving the entire organization forward, having the benefit of lessons learned from the centralization and, originally, from decentralization. Several key points should be emphasized in reviewing the alternative recommendations contained in this report:

- **Thoughtful, Effective Implementation is CRITICAL.** A defining element of multi-faceted criticism of the DAS-M centralization is the manner in which the centralization took place. Tribal Leaders and the BIA and BIE Regional Directors, who serve in sensitive positions closest to the Tribes, were not properly consulted nor briefed on the transition and its implications. As a new round of reforms and changes are contemplated by Indian Affairs, it is critical for those changes to be carefully documented, communicated with Indian Affairs leadership and Tribal Leaders, and implemented in order to achieve maximum sustainable benefit to the organization.
- **Address Organizational Issues across Indian Affairs.** Similar to other federal agencies, Indian Affairs does not presently maximize the management and administrative tools available. Communication between divisions within Indian Affairs is inconsistent and needs to be improved, as does the clarity of individual roles and responsibilities for senior executives and managers. Any successful changes to the administrative support organization will depend on the organization’s overall success in fostering a collaborative environment.
- **Carefully Coordinate Organizational Changes with Department Initiatives.** The Department of the Interior is held to administrative and management performance standards by the Office of Management and Budget (OMB). Indian Affairs should ensure that all contemplated changes are consistent with the administrative priorities established by the DOI Secretary and the Deputy Secretary in order to ensure limited resistance from OMB or other sources.



- **Do Not Sacrifice Long-Term Success for Immediate-Term Progress.** Interviews with Indian Affairs employees has revealed that many have served in federal civil service positions for decades and most possess a deep commitment to enhancing the quality of life in American Indian and Alaska Native communities. Accordingly, Indian Affairs has a unique opportunity to begin a transition process toward a more balanced and effective administrative support organization. It may take the organization several years to fully implement the localization of support services changes in the most effective manner.



Section II. Background, Approach, and Assessment

In June 2011, the Bronner Group, LLC (Bronner), a woman-owned small business with nearly 25 years of past performance supporting the public sector, was selected by the United States Department of the Interior (DOI or Department), Office of the Assistant Secretary - Indian Affairs (Indian Affairs) to conduct a three phase evaluation relating to the administrative support structure for the Bureaus of Indian Affairs and Indian Education.

Background

In 1999, the National Academy of Public Administration (NAPA) conducted a study of the Bureau of Indian Affairs (BIA) administrative support services. For purposes of this report, the term “support functions” includes accounting/finance, budget, acquisitions/contracting, property management, safety management, human resources, information technology, as well as engineering and facilities management. NAPA’s recommendations and the corresponding actions taken by Indian Affairs remain a topic of considerable interest and disagreement amongst Tribal leaders, DOI leadership, and Indian Affairs employees. In particular, employees within the two primary operating divisions of Indian Affairs, the BIA and the Bureau of Indian Education (BIE), possess very strong and experience-based views concerning the 1999 study and the current organizational structure for support functions.

Despite strong opinions concerning support function operations, Indian Affairs employees expressed appreciation for some of the many challenges confronting support function employees on a daily basis.

Although NAPA recommended the centralization of some support functions, in 2004-2005, Indian Affairs leadership realigned all support functions from a decentralized delivery model to a centralized model. This restructuring was not implemented smoothly and continues to generate intense interest amongst Indian Affairs employees and the Tribal Leaders. This report will present and analyze a wide range of feedback about



the support function centralization. Additionally, it will highlight and discuss additional elements that have been reported by employees and managers within Indian Affairs or by the Tribal Leaders directly. These additional elements reveal a number of factors that Bronner's project team believes are interrelated with any analysis of the 1999 NAPA study and the present day support function organization. Some of these elements include:

- Indian Affairs employees reported that during the period spanning the late 1990s and the early 2000s, Indian Affairs experienced considerable turnover in appointed leadership positions, including the position of the Assistant Secretary – Indian Affairs.
- The period of time covering the transition of support functions (early 2000s) runs parallel to a broader cultural change across the federal sector – a culture which placed considerable emphasis on efficiencies, controls and accountability.
- Despite strong opinions concerning support function operations, Indian Affairs employees expressed appreciation for some of the many challenges confronting support function employees on a daily basis.
- As is routinely the case in examinations concerning the efficiency and effectiveness of federal agency support functions, there is considerable confusion and lack of appreciation for the many systematic controls and delays that apply to (and equally frustrate) all federal agencies.
- The BIA and BIE are dramatically different from both mission and operational perspectives. As a result, points of view concerning support function effectiveness do not necessarily originate from a similar organizational culture or mindset.

Approach

Indian Affairs provided strong and responsive oversight and guidance concerning the performance of this initiative by Bronner's project team. Weekly project management meetings were convened by the Office of the Assistant Secretary – Indian Affairs to ensure that the project team had access to the information and the individuals necessary for the completion of a comprehensive, fair, and open evaluation.



The project team assigned by Bronner, to support the Department and Indian Affairs, included a range of senior professionals with deep experience in the management and administration of support functions for federal agencies. The team's Project Manager, a retired member of the federal Senior Executive Service (SES), provided day-to-day project management and guidance to the mix of Analysts, Consultants and Subject-matter Experts who participated in the effort.

Bronner's project team conducted a variety of activities to ensure that feedback from all concerned parties – particularly from Tribes and Indian Affairs employees – would be incorporated in the report. Those efforts included:

- **Tribal Leader Consultations**

- August 2, 2011 in Bar Harbor, Maine
- August 3, 2011 in Scottsdale, Arizona
- August 9, 2011 in Hinckley, Minnesota

The Office of the Assistant Secretary established a clear goal that this particular review would be based on extensive internal and external feedback.

- **Tribal Leader Interviews¹**

Bronner interviewed 21 members of the Tribal/Interior Budget Council.

- **Employee Surveys**

Two separate surveys were administered to Indian Affairs employees from August 8-19, 2011. The first survey was to solicit responses from Deputy Assistant Secretary – Management (DAS-M) employees only. The second survey was to solicit responses from all other Indian Affairs employees (Non-DAS-M employees).

¹ The list of Tribal Leaders interviewed by Bronner is included in Appendix A.



- **Management and Employee Interviews²**

To achieve maximum clarity on the nature of existing support function operations, the project team conducted interviews or focus groups with more than 200 Indian Affairs personnel, including the Principal Deputy Assistant Secretary, Chief of Staff, the Directors of BIA and BIE, and a range of DAS-M, BIA and BIE managers and employees.

Focus Group Location	Date
Phoenix, AZ	June 2011
Albuquerque, NM	July 2011
Catoosa, OK	August 2011
Seattle, WA	August 2011

- **Department Leadership Interviews**

In order to gain insight into the Department's perspective, the Project Executive and Manager interviewed the DOI Deputy Secretary and the Chief of Staff to the Secretary. In addition the Project Manager interviewed executives from the DOI Performance, Management and Budget Office. In February 2012, the Project Manager facilitated a Leadership Roundtable with the Deputy Secretary, Indian Affairs executives, the Directors of the National Park Service and the Fish & Wildlife Service, the Deputy Directors of the Bureau of Ocean Energy Management and the Bureau of Safety and Environmental Enforcements and executives from the DOI Performance, Management and Budget Office.

- **Regional Office Feedback**

Given the historical involvement of Indian Affairs BIA Regional Offices in the provision and management of support functions, special effort was made to conduct focus groups and interviews with Regional employees and managers.

² The Managers and Employees interviewed by Bronner are included in Appendix A.



Evaluation of the 1999 NAPA Recommendations

The NAPA 1999 report, entitled *Study of Management and Administration: The Bureau of Indian Affairs*, contained a wide range of findings and recommendations relating to human resources, budget, property management, internal controls, performance management, and organizational structure.

Bronner assessed the current status of each NAPA recommendation.³ Many of the recommendations contained in the report have been accepted and acted upon. Other recommendations, such as more centralized policy guidance, were expanded to include the full centralization of administrative services. In many cases, implementation of the NAPA recommendations by Indian Affairs has improved underlying conditions that were cited in that same assessment. However, there are a number of actions taken by Indian Affairs, in response to the NAPA recommendations, which are deemed more aggressive.

One area of ongoing debate relating to the 1999 recommendations is the full centralization of support functions. Before the centralization in 2004-2005 of support functions to the new Deputy Assistant Secretary for Management (DAS-M) organization, support functions were organizationally housed and managed by the BIA. Bronner's evaluation finds that the centralization of support functions, while addressing some issues contained in the 1999 NAPA report, created a new and different set of organizational challenges within Indian Affairs. The centralization was marred by a poor communication plan as well as incomplete descriptions of roles, responsibilities, and policies.

The full centralization of support functions unnecessarily altered many positive characteristics of the earlier organizational model.

The new system, despite the diligent efforts of support function managers and employees, is not structured in a fashion that facilitates or encourages collaboration with BIA and BIE field sites. The support function structure does not aid the efforts of support function employees and managers, most of which have frequently resigned to transactional relationships with their BIA and BIE counterparts.

³ A complete analysis of the NAPA recommendations is described in Appendix B.



Indian Affairs relies on personal relationships, rather than organizational structure, to complete administrative tasks. One constant refrain offered to Bronner's project team from Tribal Leaders and Indian Affairs employees was, "when the system works today, it works in spite of the system." This acknowledgement is consistent with Bronner's overall evaluation of the current support function structure: sole management of support functions and support function employees under the DAS-M organization is not the most effective and efficient solution for Indian Affairs. The full centralization of support functions unnecessarily altered many positive characteristics of the earlier organizational model (namely the close coordination with program and service delivery through the BIA and BIE).

Centralization of certain support functions, however, has resulted in better and more effective management of Indian Affairs resources. Budget and financial management, for example, have undergone considerable improvement in the accountability and compliance framework as a result of support function centralization.

Overview of the Current Deputy Assistant Secretary for Management Organization

In 2004-2005, the support functions were centralized in a new organization under the DAS-M. Prior to the centralization, support functions for both BIA and BIE were organizationally housed and managed by the BIA. The DAS-M organizational structure, comprised of approximately 653 full-time federal employees, provides services in the following administrative areas: accounting/finance, budget, acquisitions/contracting, property management, safety management, human resources, internal controls, performance management, information technology, along with engineering and facilities management. The various offices within the DAS-M structure are charged with two core responsibilities: providing transactional support to the operating units of Indian Affairs (primarily the BIA and BIE), and maintaining Indian Affairs' compliance with federal administrative requirements in each of the respective support areas.

As a general statement, Bronner's project team was favorably impressed by the commitment, professionalism and capabilities of the support function employees. The support function management team extended

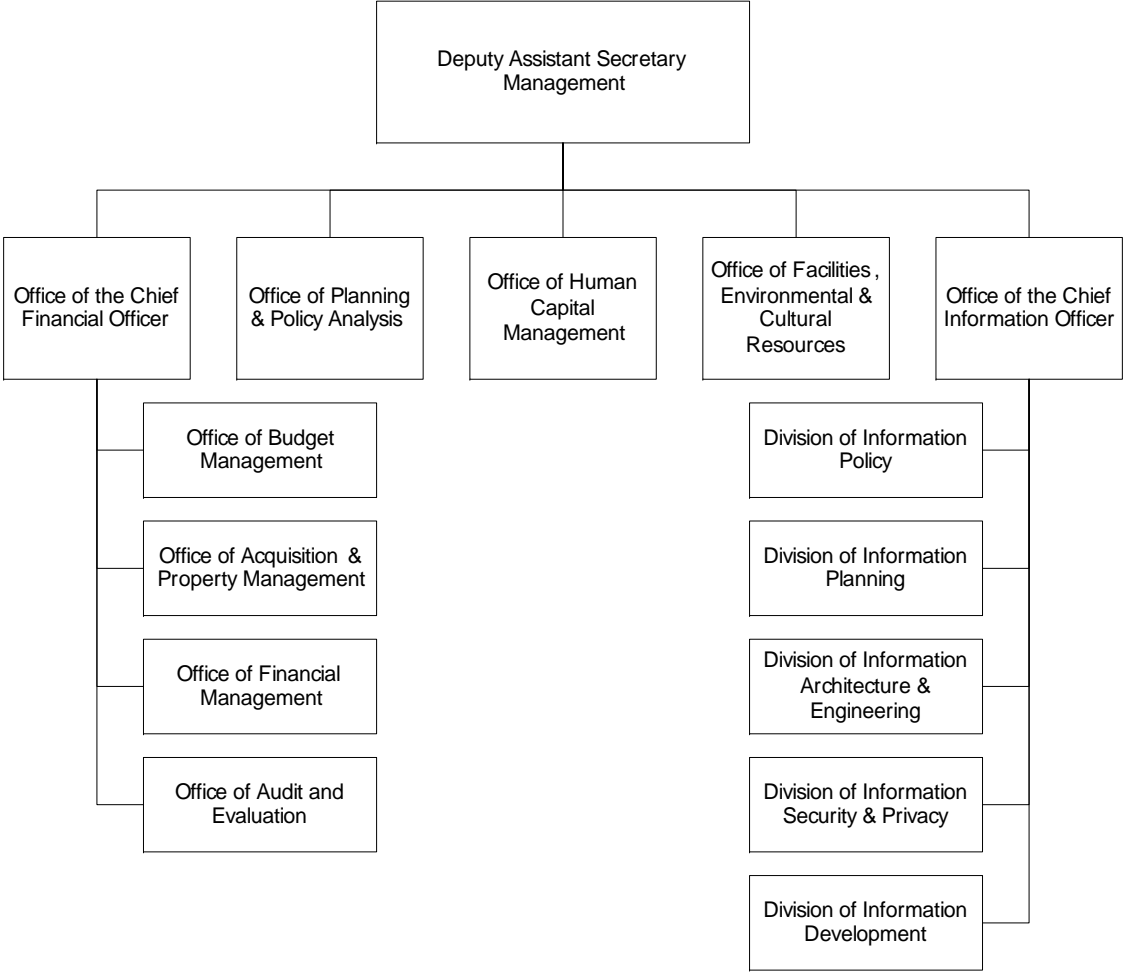


unlimited cooperation to the project team during this evaluation, including the submission of countless documents and reports that were requested at the project's outset.



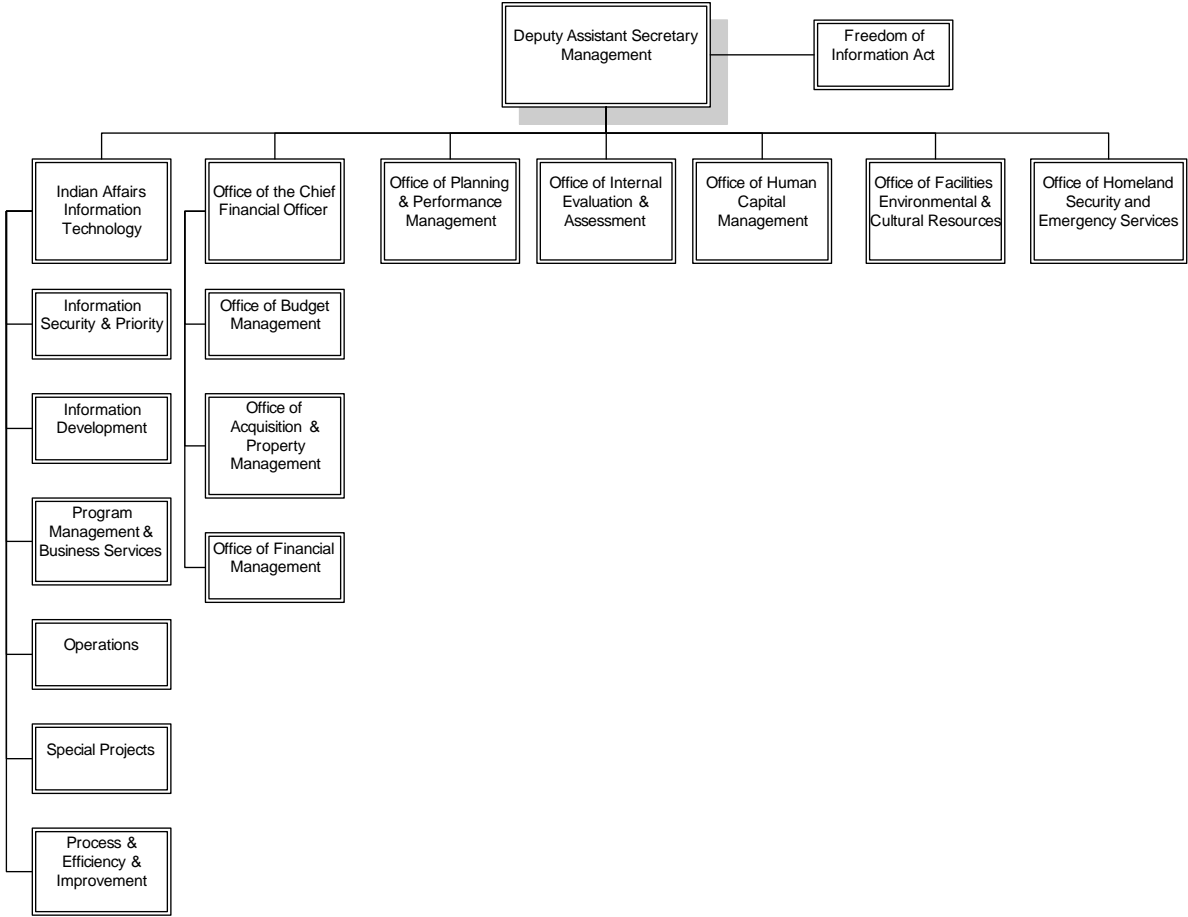
DAS-M Approved Organizational Chart

The DAS-M Approved Organizational Chart depicts the official and approved organizational structure of DAS-M.



DAS-M Operational Organization Chart

The following DAS-M Operational Organization Chart depicts how DAS-M is operationally structured (not approved).



Demographics

The DAS-M is comprised of 653 full-time employees– including 6 Senior Executive Service (SES) employees⁴ - who are divided into nine offices. Of the 653 DAS-M employees, a majority occupy GS-12, 13, and 14 positions:

GS-Level	Number of Employees	Percentage of DAS-M Total
12	116	17.8%
13	112	17.2%
14	114	17.3%

Unfortunately, the support function structure shows many signs of a typical federal organization that was created hastily and without a proper transition plan. The structure lacks critical metrics by which to measure its activities and effectiveness (leaving its image across Indian Affairs highly susceptible to anecdotal judgment). And perhaps most significantly, the structure is poorly served by a wholly inadequate communications and coordination program, rendering meaningful long-term collaboration with its customers virtually impossible.

Survey Overview

Two separate surveys were electronically administered to Indian Affairs employees from August 8-19, 2011. The first survey was to solicit responses from DAS-M employees only. The second survey was to solicit responses from all other Indian Affairs employees (non-DAS-M employees). These surveys were intended to measure employee sentiment, satisfaction and other feedback about the existing DAS-M organizational

⁴ The employee count and distribution is based on data provided as of July 15, 2011.



structure. Notably, 46.7% of DAS-M employees and 23.7% of non-DAS-M employees participated in one of the online surveys, a decrease from the typical 52.2% participation rate for federal workforce surveys.⁵

The responses to certain survey questions proved to be valuable in validating the observations of the project team about the existing organizational structure.

Tribal Leader Input

The purpose of the Tribal Leader Consultation sessions and Tribal Leader interviews was to ensure that the views and perspectives of Tribal Leaders are a primary driver of this independent assessment, particularly as many Tribes have registered concerns over the historic efficiency of administrative service delivery by federal agencies, including the Department. Bronner's project team posed a series of broad questions to participants in the Tribal Leader Consultation sessions to derive the extent to which the current support structure has aided or impeded services across American Indian and Alaska Native communities.

Comparison of Peer Agencies

To present a well-rounded and thorough view of peer agencies and alternative options, Bronner's project team participated in a range of activities:

- **Peer Agency Interviews:** Bronner's project team convened dozens of interviews with federal managers from other federal agencies to understand organizational structures and business practices.
- **Best Practice Analysis:** Bronner's project team reviewed a range of publications, white papers, and government reports that outline organizational strategies and best practices.

The federal agencies with the best administrative support offices are unified in their commitment to both mission accomplishment and internal and external customer service. The federal agencies that experience

⁵ In the 2010 Federal Employee Viewpoint Survey, government-wide response rate was 52.2%. The response rate of the Department of the Interior was 58.8%.



challenges with delivery of support services have either lost sight of their mission, or do not value efficient and effective customer service. Bronner reviewed support service delivery options in five peer agencies: the Indian Health Service, the U.S. Fish and Wildlife Service, the Department of Justice Executive Office for the United States Attorneys, the National Park Service, and the U.S. Forest Service.

In addition to describing the support service delivery model for each of the five agencies, Bronner analyzed the 2010 and 2011 Best Places to Work in the Federal Government rankings.⁶ The Federal Employee Viewpoint Survey (formerly the Federal Human Capital Survey), upon which the Best Places to Work rankings are based, was updated to gather more useful data to assist federal agencies improve the workplace and increase productivity. The survey, now conducted annually, focuses on employee perceptions that drive job satisfaction, commitment, engagement, and mission accomplishment.

For the purpose of this analysis, Bronner chose to benchmark Indian Affairs and the five peer agencies against five categories in the Best Places to Work survey for both 2010 and 2011. These categories were used to quantify the effectiveness and fairness of each agency's leadership, the culture of teamwork, and the availability of training and development for the workforce. The following table provides the description of the categories.

⁶ The Best Places to Work in the Federal Government® rankings draw on responses from more than 263,000 civil servants to produce detailed rankings of employee satisfaction and commitment across federal agencies and subcomponents. The Partnership for Public Service uses data from the Office of Personnel Management's Federal Employee Viewpoint Survey to rank agencies and their subcomponents. Agencies and subcomponents are ranked according to a Best Places to Work index score, which measures overall employee satisfaction, an important part of employee engagement and, ultimately, a driver of organizational performance. In addition to this employee satisfaction rating, agencies and subcomponents are scored in 10 workplace categories such as effective leadership, employee skills/mission match, pay and work/life balance.



Best Places to Work	
Category	Description
Effective Leadership – Leaders	The Leadership - Leaders category measures the level of respect employees have for senior leaders, satisfaction with the amount of information provided by management, and perceptions about senior leaders' honesty, integrity and ability to motivate employees.
Effective Leadership - Supervisors	The Leadership - Supervisors category measures employees' opinions about their immediate supervisor's job performance, how well supervisors give employees the opportunity to demonstrate leadership skills, and the extent to which employees feel supervisors support employee development and provide worthwhile feedback about job performance.
Effective Leadership - Fairness	The Leadership - Fairness category measures the extent to which employees believe arbitrary action and personal favoritism is tolerated, and if employees feel comfortable reporting illegal activity without fear of reprisal.
Teamwork	The Teamwork category measures the extent to which employees believe they communicate effectively both inside and outside of their team organizations, creating a friendly work atmosphere and producing high quality work products.
Training and Development	The Training and Development category gauges the extent to which employees believe their development needs are assessed and appropriate training is offered, allowing them to do their jobs effectively and improve their skills.



Overall Rankings: 2010 and 2011 Best Places to Work in the Federal Government

2010 Overall Rankings		2011 Overall Rankings	
Sub-Agency Name	Rank out of 224	Sub-Agency Name	Rank out of 228
Executive Office of US Attorneys	8	Executive Office of US Attorneys	17
Fish and Wildlife Service	39	Fish and Wildlife Service	37
National Park Service	139	National Park Service	163
Indian Health Service	177	Indian Affairs	189
Indian Affairs	179	Forest Service	194
Forest Service	203	Indian Health Service	209

Across years 2011 and 2010, **Executive Office for U.S. Attorneys'** (EOUSA) ranking is the best when compared to the peer agencies observed in this report. The **Fish and Wildlife Service** (F&WS) and the **National Park Service** (NPS) ranked second and third – respectively – when compared to the peer agencies and Indian Affairs. **Indian Affairs** experienced some improvement in 2011 compared to the peer agencies; however, Indian Affairs' ranking dropped when compared to all federal sub-agencies. The Forest Service experienced improvement in its overall ranking. The **Indian Health Service** (IHS), on the other hand, landed in last placed in 2011 – when compared to the peer agencies observed for this study.



The tables below show the rank and scores of Indian Affairs and the five peer agencies in the focus areas assessed by Bronner. A discussion of the results follows.

Best Places to Work - Rankings												
Category	Indian Affairs		Indian Health Service		Fish and Wildlife Service		Executive Office of US Attorneys		National Park Service		Forest Service	
	2010	2011	2010	2011	2010	2011	2010	2011	2010	2011	2010	2011
Overall Ranking	179	189	177	209	39	37	8	17	139	163	203	194
Effective Leadership – Leaders	207	211	195	214	112	164	11	20	186	190	217	218
Effective Leadership - Supervisors	216	225	220	228	81	119	28	74	180	204	151	151
Effective Leadership - Fairness	217	225	213	224	86	104	29	46	185	185	150	152
Teamwork	220	227	222	228	133	145	26	79	206	217	162	177
Training and Development	165	192	174	201	29	34	12	20	198	210	138	117

*Rank is based off a total of 224 federal sub-agencies surveyed in 2010 and 228 sub-agencies in 2011.

*Ranks 1-75 highlighted in green

Ranks 76-151 highlighted in yellow

Ranks 152-224 highlighted in red



<i>Best Places to Work - Scores</i>												
Category	Indian Affairs		Indian Health Service		Fish and Wildlife Service		Executive Office of US Attorneys		National Park Service		Forest Service	
	2010	2011	2010	2011	2010	2011	2010	2011	2010	2011	2010	2011
Overall Score	59.9	58.3	60.0	56.4	72.2	70.9	79.3	74.3	63.7	61.0	56.3	58.1
Effective Leadership - Leaders	40.4	41.3	42.4	40.6	50.4	46.5	64.6	61.4	43.8	44.0	37.7	39.6
Effective Leadership - Supervisors	56.2	53.0	54.5	50.7	67.0	65.7	70.8	68.1	62.2	59.9	63.8	63.6
Effective Leadership - Fairness	41.4	39.9	43.9	41.6	55.9	55.4	62.2	59.8	48.7	49.8	51.6	52.4
Teamwork	54.1	51.5	52.1	49.8	65.0	64.5	71.9	68.1	59.6	58.4	63.3	63.1
Training and Development	56.5	53.7	55.9	52.2	69.0	67.3	74.7	70.3	53.3	50.9	59.0	60.2

* Scoring is based on a scale of 1-100, with 100 being a perfect score.

In all the categories examined by Bronner, **Indian Affairs** failed to score higher than 59 in either 2010 or 2011. In the category Effective Leadership – Fairness, Indian Affairs scored 39.9 out of 100. The **Indian Health Service** had scores similar to Indian Affairs.



The **Fish and Wildlife Service** (F&WS) ranked the highest of all the DOI agencies in the 2010 Best Places to Work list. However, in 2011, the F&WS fell to second place behind the DOI Office of the Inspector General, who took first place. Compared to Indian Affairs, the F&WS employs a similar number of employees. Also, both organizations have a nationwide presence. Even though each organization's mission is very different, the Best Places to Work rankings focus on employee satisfaction, an important aspect of employee engagement. In the categories of Effective Leadership, Teamwork, and Training and Development, the Fish and Wildlife Service scored higher than Indian Affairs.

The Best Places to Work ranking included employees in both the **Executive Office for U.S. Attorneys** (EOUSA) and the U.S. Attorney Offices. As such, 10,625 employees were included in the survey. In 2010, the EOUSA scored 79.3 and ranked number eight among all 224 federal agencies and sub-agencies included in the survey. In 2011, however, the EOUSA dropped in its ranking with a score of 74.3 and ranked 17. But in contrast with Indian Affairs, the EOUSA still scored significantly higher in the areas of Effective Leadership, Teamwork, and Training and Development.

In 2010, The **National Park Service** (NPS) ranked 139 out of 224 in the 2010 Best Places to Work list. In response to the results of the 2010 Best Places to Work rankings, the NPS took aggressive steps to address their weaknesses. The NPS engaged a consultant to assess the causes of their low scores, and the reasons their ranking continued to decrease since 2002. Through focus groups and interviews, the consultant determined that the primary issues were hiring, leadership, workplace enrichment, and career advancement. The NPS instituted a number of changes to address these issues in FY 2011. However, this year has been met with much economic uncertainty. The federal workforce was under a hiring and pay freeze. There was also less resources to fund training and development. This dissatisfaction is reflected in the 2011 survey for all federal agencies. The NPS, despite its aggressive efforts to improve the workplace, dropped to a ranking of 163 and a score of 61.0, and did not achieve significant improvements in the categories assessed by Bronner.

While Indian Affairs ranked 179 in the 2010 Best Places to Work list, the **Forest Service** scored 56.3 with a rank of 203 out of 224 federal agencies and sub-agencies included in the survey. However, in 2011, the



Forest Service was able to increase its ranking to 194 – with a score of 58.1. Both the Forest Service and Indian Affairs recorded low scores in Effective Leadership - Leaders and Teamwork over both years surveyed. However, the Forest Service recorded significant improvement in its Training and Development score in 2011.



Section III. Findings, Range of Delivery Options and Recommendations

The Assistant Secretary – Indian Affairs, in seeking a comprehensive review of support services within the organization, asked Bronner to provide external findings about organizational weaknesses and areas of opportunities to improve the delivery of support services. In addition to the findings themselves, Indian Affairs sought detailed analysis concerning: 1) Tribal Leaders’ feedback relating to individual challenges; 2) Indian Affairs employee feedback relating to work-place challenges; 3) a presentation of options utilized by peer agencies to address similar challenges; and finally 4) recommendations for how Indian Affairs can move forward with organizational improvement.

The Assistant Secretary – Indian Affairs, in seeking a comprehensive review of support services within the organization, asked Bronner to provide external findings about weaknesses or opportunities to improve the delivery of support services. In addition to the findings themselves, Indian Affairs sought detailed analysis concerning: 1) Tribal Leaders’ feedback relating to individual challenges; 2) Indian Affairs employee feedback relating to work-place challenges; 3) a presentation of options utilized by peer agencies to address similar challenges; and finally 4) recommendations for how Indian Affairs can move forward with organizational improvement.

This chapter - Findings, Range of Delivery Options, and Recommendations – has been designed to meet Indian Affairs’ expectations as outlined above. It is written with a heavy focus on presenting operationally viable alternatives that will support the Department’s and Indian Affairs’ goal of providing more responsive programs and services to the American Indian and Alaska Native community. The chapter is organized by functional area in the following order:

- A. Budget and Financial Management
- B. Acquisition and Contract Management



- C. Property and Facility Management
- D. Human Resources
- E. Safety
- F. Internal Controls
- G. Homeland Security and Emergency Services
- H. Information Technology
- I. Communications

For each functional area, Bronner presents: 1) findings as related to Indian Affairs' operational efficiency and effectiveness; 2) a range of options to mitigate the identified findings; and 3) the recommended course of action with an implementation plan.

Bronner's approach for developing options and alternatives is to highlight the most critical findings affecting the delivery of support services to Indian Affairs' programs. Bronner utilizes a risk-based approach to develop options for improved administrative services. This risk-based approach balances consideration of effective program delivery and efficiency.

In developing each option, Bronner took into consideration budget and staffing models, as well as gaps in resources for improved service delivery. For each option, Bronner identifies roadblocks, in addition to current ineffective, duplicative processes and practices. Moreover, Bronner identifies gaps in staffing capacity and capability, and resource constraints. As part of the narrative

DEVELOPMENT OF OPTIONS – CONSIDERATIONS

- BUDGET
- STAFFING
- EFFECTIVE AND EFFICIENT DELIVERY
- RESOURCE GAPS
- ROADBLOCKS



discussion, Bronner also assesses the information technology tools, business processes currently in place, and any additional tools and processes needed to implement an option.

It is critical to emphasize that Bronner's presentations of options is based on independent judgment along with the feedback received from Tribal Leaders, Indian Affairs employees, Indian Affairs management team, and DOI leadership. Consistent with direction from the Office of the Assistant Secretary – Indian Affairs that this initiative be highly collaborative, Bronner's project team approached this project with the express commitment of providing sound management recommendations that empower all employees to chart a course for the future.

Within the recommendations section, Bronner presents an implementation plan, or "next steps", which is categorized into immediate (1-6 months), intermediate (7-12 months), and long term (13 months and beyond) actions. Based on Bronner's evaluation, all "immediate next steps" may be implemented under a very limited administrative cost structure and without disruption of programs and services to the Tribes.

A guiding principle of this support function initiative is that all Indian Affairs offices and employees play a critical role in delivering programs and services to American Indians and Alaska Natives. While the BIA and BIE employees serve on the frontlines and are highly visible to Tribal communities, support function employees play an equally important role. The federal government is dominated by rules, regulations, policies and procedures that govern the distribution and management of federal resources. Support functions perform a highly complex and challenging role: interpreting and maneuvering within those regulations in order to ensure successful delivery of programs and services. These options and recommendations are intended – first and foremost – to improve the quality of life for American Indian and Alaska Native communities by fostering a culture of results and continuous improvement for Indian Affairs and all of its dedicated employees.



A. Budget and Financial Management

Finding: The Indian Affairs Budget Formulation Process Is Reactive

Current State

The assessment of the budget formulation process at Indian Affairs demonstrated that changes could be made to improve effectiveness. Ideally, the Indian Affairs budget formulation process is collaborative with leadership provided by the Deputy Assistant Secretary – Management (DAS-M). The specific budget guidance and direction is supplied by the Chief Financial Officer (CFO), Office of Budget Management (OBM), to the BIA, BIE, and the Office of the Assistant Secretary – Indian Affairs. The process should culminate in a thoughtful budget submission that is factually supported and submitted timely to the DOI Office of Policy, Management and Budget (PMB).

The Budget Analysts in the OBM are generalists, performing both budget execution and budget formulation duties. The skills for each of these tasks, however, are very different. Budget formulation is the primary process in the budget cycle by which federal agencies identify the resources, dollars and personnel (full-time equivalents (FTEs)), necessary to effectively carry out their objectives. Budget formulation requires an in-depth knowledge of the goals, funding history and performance of the programs.

Three major budget submissions are produced each year for three different stakeholders. Generally, Indian Affairs submits a budget to senior DOI leadership in June; the DOI submission to the U.S. Office of Management and Budget (OMB) is completed in September; and the President submits the budget to Congress in February. Once the proposed budget is submitted from Indian Affairs to DOI it is embargoed from dissemination to Tribal Leaders.

Budget execution is the process for implementing Indian Affairs' budget. The allocation of resources within appropriations available to Indian Affairs is a critical funds control element. The budget execution process is



continuous. Two fiscal years appropriations are being executed during each fiscal year (appropriation accounts are available for obligation for one or two years). In addition, some Indian Affairs appropriations are available until expended (“no year”) accounts. In addition to allotting funding by appropriation, the Budget Analysts ensure that the established funds controls to cover the resources issued are maintained and monitor the use of the funds.

Currently, the OCFO does not actively lead the budget formulation effort during the early stages. The OBM does not organize and implement a front-end budget formulation process by providing BIA, BIE, or the Deputy Assistant Secretary for Policy and Economic Development (DAS-PED) with specific budget formulation guidelines, templates or deadlines. This lack of direction causes last minute data calls to BIE, BIA, and DAS-PED with the responses often lacking the specific data and support requested by PMB.

In formulating the budget, Indian Affairs currently employs a disorganized leadership decision process that convenes close in time to the required submission to the PMB, Office of Budget. This group decision process, called the “smack down,” is a two-day meeting where the leadership discuss programmatic budget needs and reach “deals” on funding levels. Many participants described the “smack down” meeting as “chaotic.” During this group discussion, the OBM staff serves more of an observational than advisory role. At the conclusion of the meetings, the participants reach a consensus and then the OBM staff prepares the proposed budget request.

Program performance information is not an essential factor in Indian Affairs’ budget formulation. Furthermore, the OBM staff does not have the responsibility for developing the performance metrics required by the Government Performance and Results Act (GPRA). The programmatic performance management program is overseen by the DAS-M Office of Planning and Performance Management (OPPM). Staff from OPPM attend the “smack down” and, only when asked, provide information to the BIA, BIE, and DAS-PED leadership concerning those programs that are meeting or falling behind their programmatic performance targets.



After the “smack down,” the proposed Fiscal Year (FY) budget is presented to the Tribal/Interior Budget Council (TIBC) which provides input into programmatic priorities, which may change the leadership’s recommendations. Finally, the OBM presents the proposed budget to the Assistant Secretary. The Assistant Secretary, in consultation with the BIA and BIE Directors, may require additional information or revisions before the proposed FY budget request is submitted to the Department. Indian Affairs’ budget submission is routinely late and incomplete.

Tribal leaders, particularly members of the TIBC, expressed general frustration with a perceived failure of Indian Affairs to act on their previous complaints about the budget formulation process. Although, the TIBC members appreciated that the current Assistant Secretary listens and is responsive to their expressed programmatic needs.

Employee and Tribal Leader Feedback

SURVEY RESULTS:

Satisfaction with the clarity of communications regarding Budget policies and procedures	
Non-DAS-M Survey Results	DAS-M Survey Results
26.0% - very unsatisfied/unsatisfied	28.1% - very unsatisfied/unsatisfied
35.3% - neutral	26.7% - neutral
38.7% - very satisfied/satisfied	45.1% - very satisfied/satisfied



EMPLOYEE FEEDBACK:

“Reduce the layers of management.”

“Budgets are created by programs and not the Regions.”

“Ultimate responsibility for budget formulation should stay in Washington, DC because you have to stay in close touch with OMB.”

“The “smack down” budget formulation meetings are chaotic.”

TRIBAL LEADER FEEDBACK:

“Allocations need to be fair.”

“We need information about how programs are performing to make funding recommendations.”

“Ensure that OMB staff attends TIBC meetings.”

“Transparency is critical.”

“Indian Affairs needs to find a better way to do budget development - look to Indian Health Service.”

“There is a lack of transparency with the distribution of carry-over funds.”

“Provide budget information to TIBC in advance of the meeting.”



Peer Agencies

The **DOI Fish and Wildlife Service** (F&WS) utilizes a hybrid delivery model for administrative support services. The F&WS's administrative functions are managed by the Deputy Director for Operations. Reporting to the Deputy Director of Operations are: 1) the Assistant Director for Budget, Planning and Human Capital, 2) the Assistant Director for Business Management and Operations, 3) the Assistant Director for Information Resources and Technology Management, and 4) eight Regional Directors. Each Regional Director has an Assistant Regional Director who functions as a chief operating officer. The Assistant Regional Director is responsible for budget, finance, human resources, and the other administrative functions in the Region.

The F&WS Headquarters Division of Budget works closely with the Regions. The Division of Budget is responsible for the formulation, justification, coordination, and execution of the budget. The Budget Division directs and manages the budget formulation process by preparing policies, procedures, and controls while ensuring compliance with statutory requirements and OMB objectives. The Division of Budget provides Regions with budget formulation guidelines, templates, and timelines. The budget formulation process is a coordinated and collaborative process that enables F&WS to submit its budget request timely and with well-written justifications.

Similarly, the **Executive Office for the United States Attorneys** (EOUSA) uses a hybrid delivery model for the delivery of administrative support. Each United States Attorney's Office (USAO) has administrative support staff. The administrative staff in the USAO report through their supervisors to the U.S. Attorney. Thus, the administrative staff's performance is rated by their superiors in the USAO.

The EOUSA Headquarters staff provides budget and finance assistance and guidance to the 94 USAOs. EOUSA Headquarters staff track, provide, and analyze data related to the work of the USAOs in the development of budget and strategic priorities. The EOUSA Headquarters Budget staff provides the USAO budget analysts with budget formulation guidelines, templates, and timelines. Budget input from the USAOs is collected and analyzed by the EOUSA Budget staff. The Washington, DC Budget staff is responsible for the



submission of the budget to the U.S. Department of Justice. In addition, each USAO has financial analysts who verify invoices and make payments for services received.

The **National Park Service** (NPS) also utilizes a hybrid delivery model for its administrative support. While each park has administrative staff that supports the day-to-day operations of the parks, the Headquarters operational offices are responsible for development and dissemination of NPS-wide policy and procedures.

The Office of the Comptroller has operational control of the Accounting Operations Center, the Budget Office, and Property and Space Management. Additionally, the Comptroller's Office retains operational control of budget formulation. The Budget Office has approximately 30 employees and is responsible for budget formulation and execution. Previously, the performance management staff was in a separate office, but it is now a unit within the budget formulation branch. By integrating the performance management staff with the Headquarters Budget staff, the NPS has found that their budget submission is stronger. The communication among the budget formulation, performance management, and program staff is critical to the organization's success. There are frequent telephone conferences and email exchanges. The NPS Budget Office views the budget formulation process as a collaborative process between the program staff and the budget analysts.

The Comptroller also allocates funds to each Park Operations and Management account. This account is used to pay salaries, training, awards, maintenance and utilities. NPS and DOI utilize prudent workforce management and not FTE controls. Unlike some federal departments, OMB does not control DOI's FTEs. A Park Superintendant makes hiring decisions based on the budget and with the approval of the Region.

The Accounting Operations Center has 130 employees. The Accounting Operations Center is responsible for payments, the quarterly and yearly financial statements, the Government Accountability Office (GAO) and Office of the Inspector General (OIG) audits, coordination with the independent auditors, and compliance with OMB Circular A-123 (Management's Responsibility for Internal Control).

In contrast, the **Indian Health Service** (IHS), within the U.S. Department of Health and Human Services (HHS), has a decentralized administrative support model that relies on staff in Area Offices. The Deputy



Director for Management Operations is responsible for providing management direction to the IHS program offices, including implementing IHS agency goals and mission; providing overall organization management to improve agency performance; developing strategic plans; and planning, directing, and evaluating the operations of the Headquarters functions, authorities, and responsibilities in support of the Director. Although there is no line authority from Headquarters to any of the Area Offices, a majority of the Headquarters program and support staff hold monthly conference calls to share information and discuss issues that need to be addressed. The staff in Management Operations provides the Departmental budget and finance guidance to the Area Offices. The Budget staff and management in the Area Offices formulate their own budget.

Conversely, the **Forest Service** generally utilizes a centralized delivery model for administrative services. The Forest Service, within the U.S. Department of Agriculture, employs a larger workforce than Indian Affairs – approximately 30,000 permanent employees. The Forest Service’s primary mission to operate the National Forests is executed through nine Regional offices. In the early 2000s, the Forest Service centralized the operations of three major business services: budget and finance, human resources management, and information technology. However, the Forest Service retained some budget staff in field units to carry out transactional budget and finance duties and act as liaisons with the employees in the centralized budget and finance office. This model is working well for the Forest Service.



Options to Improve the Budget Formulation Process

OPTIONS

Develop a protocol whereby the Office of Budget

Management (OBM) leads a front-end budget formulation process by establishing and disseminating budget formulation guidelines, templates, and timelines to programmatic directors and the TIBC

Assign OBM budget formulation staff to service a specific program area; train staff on their respective program areas

Move the programmatic performance management function from the Office of Policy and Performance Management to the Office of Budget Management

Eliminate the "smack down"

Institute a timely, thoughtful final budget decision meeting with key leadership

Collaborate with the Tribal Interior Budget Council (TIBC)

prior to the issuance of the budget formulation guidelines to align Tribal needs with Indian Affairs budget templates and timelines

Analyze the effective utilization of prior year funds and the utilization of "no-year" carry-over funds

Realign the OBM from an office within the Office of the Chief Financial Officer (OCFO) to an office that reports directly to the Deputy Assistant Secretary – Management while retaining the collaborative working relationship between budget and finance.

Create three divisions within the Office of Budget

Management: Formulation, Performance Management, and Execution. Reassign staff from the Office of Planning and Performance Management to the Office of Budget Management.



Currently, Indian Affairs' budget formulation process is reactive. No one interviewed by Bronner valued the two-day "smack down" meeting utilized by Indian Affairs to establish fiscal year budget priorities and funding levels. Because the budget formulation process is unstructured, Indian Affairs is routinely late on its budget submission to the Department. In addition, Indian Affairs has a reputation for providing fiscal year budgets with funding levels that are not fully justified.

In contrast, the peer agencies, where Budget Offices coordinate the formulation process and collaborate closely with program offices, produce fiscal year budget requests on time and with well-written justifications.

Recommendations

To improve the effectiveness of Indian Affairs' budget process, Bronner recommends that the Office of Budget Management (OBM) be realigned from an office within the OCFO to an office that reports directly to the Deputy Assistant Secretary – Management. Within the OBM, Bronner recommends creating three divisions: Formulation, Performance Management, and Execution. Staff from the current Office of Planning and Performance Management (OPPM) would be reassigned to OBM. Most peer agencies, who utilize best practices, incorporate programmatic performance management into their Budget Offices because federal budgeting is performance based. There would be no cost to move the employees in OPPM to OBM. Further, this restructuring would result in a more comprehensive budget formulation process.

Once the OBM is reorganized into three divisions, Bronner recommends that the Formulation Division Budget Analysts be assigned specific programs so that they develop an in-depth knowledge of the goals, funding history and performance of the programs. The Indian Affairs budget formulation process will improve when the Analysts gain a comprehensive understanding of BIA and BIE programs and work collaboratively with the performance management analysts. Similarly, the Budget Analysts in the Execution Division would develop expertise in their assigned areas which would improve effectiveness and efficiency.

At no cost to Indian Affairs, BIA and BIE programmatic staff could provide seminars to the Formulation Division Budget Analysts. The Budget Formulation Division could consult with the TIBC to understand their



concerns with the formulation process and obtain their assistance on the guidelines and templates. From this strong programmatic grounding, the OBM could lead an organized front-end budget formulation process by providing BIA, BIE, DAS-PED, and the TIBC with specific budget formulation guidelines, an analysis of the effective utilization of current funds, an analysis of “no year” carry-over funds utilization, budget formulation templates, and submission deadlines.⁷ Armed with this data, the two-day budget leadership meeting and subsequent meetings with the TIBC would result in a budget that is well-reasoned and supported with data.

IMPLEMENTATION PLAN

<p>MONTHS</p> <p>1-6</p>	<ul style="list-style-type: none"> • Realign the Office of Budget Management (OBM) to an office within the Office of the CFO to an office that reports directly to the Deputy Assistant Secretary – Management • Realign OBM into three Divisions: Formulation, Execution, and Performance Management • Assign OBM budget formulation staff to service specific program areas; train staff on their respective program areas • Prior to the issuance of budget formulation guidelines, collaborate with the Tribal Interior Budget Council (TIBC) to align Tribal needs with Indian Affairs budget templates and timelines • Develop a protocol where OBM leads a front-end budget formulation process by establishing and disseminating budget analyses of current programs, budget formulation guidelines, templates, and timelines to programmatic directors • Reassign the programmatic performance management function and staff from the Office of Policy and Performance Management to OBM
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⁷ An example of a pro-actively managed three fiscal year budget process is included as Appendix C.



MONTHS**7-12**

- Eliminate the “smack-down”
- Institute a timely, thoughtful final budget decision meeting with key leadership, e.g. Assistant Secretary, Principal Deputy Assistant Secretary, DAS-M Deputy Assistant Secretary and the Directors of BIA, BIE, and DAS-PED based on a thorough analysis of financial and program performance data
- Change the Indian Affairs organizational chart to reflect the realignment of OBM and the reassignment of the staff from the Office of Policy and Performance Management to OBM



Finding: Financial and Budget Management Would Benefit from Local Supervision of Field Employees

Current State

The Chief Financial Officer (CFO) is the principal advisor to the DAS-M and the Assistant Secretary on matters involving fiscal policy guidance and control of funds.

Financial Management

The Office of Financial Management (OFM) reports to the OCFO. The OFM is responsible for the following:

- All financial reporting
- Correction of audit findings
- Obligations and deobligations (delivered versus undelivered orders)
- Receivable reporting
- Loan reporting
- Non-trust fund processing
- Collections
- Disbursements of non-trust fund and trust fund accounts
- Execution of expired funds

In recent years, the independent financial auditors, KPMG LLP, conducted a consolidated audit of DOI. In both FY10 and FY 11, KPMG did not find material weaknesses with the financial position of Indian Affairs. Indeed, Indian Affairs contributed to the DOI's achievement of an unqualified or "clean" audit opinion. The improvement of its financial position has been a tremendous achievement for Indian Affairs.

In addition to the preparation of the financial statements, the Headquarters staff in the OFM has an important role in ensuring financial data integrity. Both the Financial Reporting and Analysis Division and



the Division of Financial Systems are involved in ensuring that financial reports are accurate so that officials, both within and outside the Department, may rely on the information to make decisions. To ensure the integrity of financial data, it is imperative that requests for ad-hoc financial reports are controlled by the OCFO management, rather than informal requests to staff members. This procedure will ensure proper data verification and valid financial reports.

Currently, OCFO produces standard financial reports using several tools including Business Objects Enterprise System 4.0 (BOES), Crystal Reports, Document Direct and BERT (Budget Execution Reporting Tool). These reports are widely available to Indian Affairs employees and managers to assist in program management. As Indian Affairs prepares for the November 2012 conversion to the Department's financial system, Financial and Business Management System (FBMS), the legacy reporting software will be retired and Indian Affairs will rely on BOES for financial reports.

Division of Field Operations Accounting

There are 41 FTEs located in the 12 BIA Regional Offices who perform local transactional accounting functions. In Indian Affairs, the fiscal payment process is decentralized. Employees in the Regional Offices perform field payment functions, except those associated with travel. While the employees in the Field are located in BIA Regional Offices, they report to the OCFO Deputy Director, Field Operations Accounting, and not the BIA Regional Director. While the Field Operations Accounting employees are located in the BIA Regional Offices, they collectively support both BIA and BIE. They are not assigned to specific programmatic accounts. The employees report to the OCFO Deputy Director, Field Operations Accounting, and not the BIA Regional Director or the BIE Assistant Deputy Director for Administration.

OCFO has internal controls in place to ensure the payments performed in the BIA Regional Offices are accurate. Monthly internal audits are performed by OCFO Fiscal Services for all teams. If there is an error in the audit, training is provided by Fiscal Services Headquarters staff. If there are serious errors, the payment process is brought back to the OCFO central office.



Budget Formulation and Execution Activities in Headquarters and the Field

The OCFO OBM (central office) is responsible for ensuring funds are obligated in accordance with rules and regulations established in the appropriations language, OMB circulars, appropriations statutes, and U.S. Department of the Treasury guidance. OBM is responsible for the following:

- Establishing allotment levels and entering the levels into the accounting system
- Assisting with all reprogramming requests
- Ensuring Senior Management is kept advised of resource levels, including obligation rates
- Ensuring systems controls are in place over allotments

One of the most important responsibilities of this Headquarters group is funds control. According to the Indian Affairs Manual, Part 26, Chapter 2, the Director of OBM is responsible for budgetary data entered into the accounting system, including all allotments and sub-allotments. Therefore, OBM is responsible for ensuring information is entered into the system accurately and that strong internal controls are established and maintained.

Field Budget Operations Division

The Field Budget Operations Division is responsible for supervising, overseeing, and analyzing the disbursement of funds to the 12 Regions. The Division is headed by the Division Chief (who is located in Nashville, TN) – who has two GS-14 employees (one in Nashville, TN and one in Portland, OR) who share responsibility for managing the Budget Analysts in the 12 BIA Regions. Currently, the Division manages 27 Field FTEs. In addition to supervising the Field Budget staff, the DAS-M Headquarters Budget Field Operations Division is responsible for communicating key information to the Field, and providing training to Field budget employees on the different budget related skills.

The 26 Budget employees in the Field are responsible for providing customer service to BIA Regional Directors and Regional Program Managers. These Field Budget Analysts should provide timely processing of budget



allocations to both Regional program offices and Agency offices. They should also participate in providing budget options for the development of management decisions and organizational plans for the Region. The Field Budget Analysts should participate in meetings and conferences concerning the overall management of the operating programs of the Region, and provide options to assist management in budget decisions concerning programmatic, financial and manpower priorities. Although the Budget Analysts are physically located in the BIA Regional Offices and advise the Regional management team, they do not report to Regional management.

For budget execution tasks, OBM Headquarters Budget staff performs Federal Finance System (FFS) transactions for Apportionment (PA), Allotment (B1), and Sub-Allotment (B2), which entails the movement of funds from the Treasury account to the Bureau accounts. Field Budget staff process Allocation (B3) level transactions, which entails posting funds from the Bureau account to their respective Regional programs. In addition, Field Budget Analysts process Sub-Allocation (SA) level transactions. Field Budget Analysts additionally provide a monthly balance reconciliation of each program at the Allocation (B3) level. In summary, Headquarters staff is responsible for Apportionment through Sub-Allotment levels of fund distribution while the Field staff is responsible for Allocation through Sub-Allocation levels of fund distribution.

Similarly, responsibility for the BIE budget functions and payments are performed by two employees located in Albuquerque, New Mexico. The Assistant Deputy Director for BIE Administration is also located in Albuquerque; however, the budget staff supporting BIE does not report to him.



Employee and Tribal Leader Feedback

SURVEY RESULTS:

Satisfaction with the clarity of communications regarding Financial Management/Accounting policies and procedures	
Non-DAS-M Survey Results	DAS-M Survey Results
18.8% - very unsatisfied/unsatisfied	27.1% - very unsatisfied/unsatisfied
41.4% - neutral	28.8% - neutral
39.8% - very satisfied/satisfied	44.1% - very satisfied/satisfied

EMPLOYEE FEEDBACK:

“The independent financial audit results are a very positive accomplishment.”

“The Regions should have the authority to execute the distribution of funds and payments.”

“Taking away authority from the Regions breaks the connection with their customers (the Tribes) and creates stumbling blocks in service delivery.”

“Move day-to-day budget operations to the Regions.”

“Regions need to control their budgets.”

“The authority for financial audits should stay in Washington, DC.”



“Responsibility for processing payments should be local.”

“The budget execution staff should install software that uploads data from the financial expenditure reports into the budget execution module to prevent manual data entry.”

“The OCFO should maintain responsibility for allocations, sub-allocation, reprogramming and reimbursable agreements.”

“Day-to-day responsibility for budget execution and accounting should be under the direction of the Regional Director and BIE.”

TRIBAL LEADER FEEDBACK:

“Regional Directors need to control their budgets and make financial decisions.”

“Funding takes too long to get to the Tribes after Congress passes an appropriation.”

“Indian Affairs does not handle proportional funding under a continuing resolution well.”

“Some Budget authority needs to be in the Region so Tribes receive faster service.”



“There should be a budget analyst/officer in each Region to improve communication and lines of authority.”

Peer Agencies

The descriptions of the budget/financial functions contained in the previous section are equally applicable to the budget execution and accounting functions.

Options for Continuous Improvement of the Budget and Financial Processes

OPTIONS

Headquarters to develop and disseminate policies, procedures, and internal controls, before localizing the supervision of the current Finance and Budget Field Operations staff.

Realign supervisory relationship of 26 OBM Field Operations staff from DAS-M OCFO to the BIA Regional Directors and/or the BIE Assistant Deputy Director for Administration. DAS-M OCFO to retain authority for Indian Affairs’ budget policy and training.

Designs and produces financial reports on a regular basis and tests for data integrity

Maintain standard processes for the preparation of quarterly and yearly financial statements that tie to the general ledger

Realign supervisory relationship of 41 FM Field Operations staff from DAS-M OCFO to the BIA Regional Directors and/or the BIE Assistant Deputy Director for Administration. DAS-M OCFO to retain authority for Indian Affairs’ financial policy and training.

Retain the current structure of the OCFO

Establish continuous improvement teams with focus on internal controls.



A key to Indian Affairs' successful financial audit results is that the centralized OCFO is responsible for all financial policies and procedures, the general ledger, financial statements, all financial reporting, financial internal controls, and corrections of audit findings. When considering organizational changes, it is critical that the strides Indian Affairs has made in financial management be preserved.

It is not a viable option to move any of these core financial functions to the BIA Regional Offices or BIE. Because Indian Affairs is in the process of converting to the Department's financial system, FBMS, it is critical that OCFO maintains a leadership role to ensure a successful roll-out of FBMS. Any conversion to a new financial system is complicated, and OCFO will provide leadership to manage the financial data transfer, the development of new procedures, staff assignments, and the application of strong financial controls.

Nevertheless, the feedback from the employees and the Tribal Leaders support more local control of the budget and accounting functions. Successful peer agencies have achieved local control through a hybrid support structure with centralized financial controls, but local responsibility for budget and accounting transactions.

Recommendations

Indian Affairs is in an excellent position to solidify its current standing as a reliable steward of federal funds. With their focus on continuous improvement and internal controls, OCFO will continue to contribute to unqualified independent audit opinions.

Feedback from the BIA, BIE, and Tribal Leaders supports more local control of the Accounting and Budget staff that is currently physically located in the Field. With more local control, the BIA and BIE will be able to react more quickly to new initiatives and changed conditions. Although there may be a moderate disruption to OCFO operations by realigning the supervisory relationship for the Field staff in the OBM Field Operations



Budget Division and the Office of Financial Management Division of Field Operations, customer service and accountability will improve with local control. The importance of responsive service to the Tribal and Alaska Native communities cannot be underestimated.

With a hybrid delivery model where the Headquarters/Central OCFO is responsible for Indian Affairs' financial and budget policy and procedure development and dissemination, there is consistency and control of the general ledger. On the other hand, when the Field staff is accountable to BIA and BIE local management, responsiveness is improved. OCFO will maintain standards through internal controls and internal financial audits. In addition, the central OCFO staff will provide training for the Field staff.

Currently, field Accounting and Budget employees work closely with management teams in the BIA Regions and BIE. Yet, BIA and BIE leaders do not have the authority to manage these employees' workload or performance. Accountability will improve if Field Operation Budget Analysts and Field Operation Accounting Specialists report to the BIA Regional Directors and/or the BIE Assistant Deputy Director for Administration. Under this hybrid model, Headquarters Budget staff will continue to be responsible for Apportionment through Sub-Allotment levels of fund distribution while the Field staff is responsible for Allocation through Sub-Allocation levels of fund distribution.

While there is no financial cost to realign the Field employees' supervisory relationship, the change should not be effectuated until all the budget policies and procedures are updated. The responsibilities and authorities of DAS-M OCFO, BIA, and BIE must be clear, or Indian Affairs will experience another unsuccessful reorganization similar to the 2004/2005 centralization of support functions.



IMPLEMENTATION PLAN

<p>MONTHS 1-6</p>	<p>DAS-M OCFO:</p> <ul style="list-style-type: none"> • Retains responsibility for Indian Affairs’ financial and budget policies and procedures, the general ledger, financial statements, financial reporting, financial internal controls, training and corrections of financial audit findings. • Designs and produces financial reports on a regular basis and tests for data integrity • Establishes and maintains standard processes for the preparation of quarterly and yearly financial statements that tie to the general ledger • Establishes continuous improvement teams with a focus on internal controls • In collaboration with BIA and BIE, revises, updates and disseminates OCFO policies, procedures, manuals, and authorities to reflect the changes in the supervisory chain of command for Field Budget and Accounting employees
<p>MONTHS 7-12</p>	<ul style="list-style-type: none"> • Realign the supervisory relationship of the 41 Field Operations Accounting FTE and funded vacancies from DAS-M OCFO to the applicable BIA Regional Director or the Assistant Deputy Director for BIE Administration • Realign the supervisory relationship of the 26 Office of Budget Management Field Operations FTE and funded vacancies from DAS-M OCFO to the BIA Regional Directors and/or the BIE Assistant Deputy Director for Administration

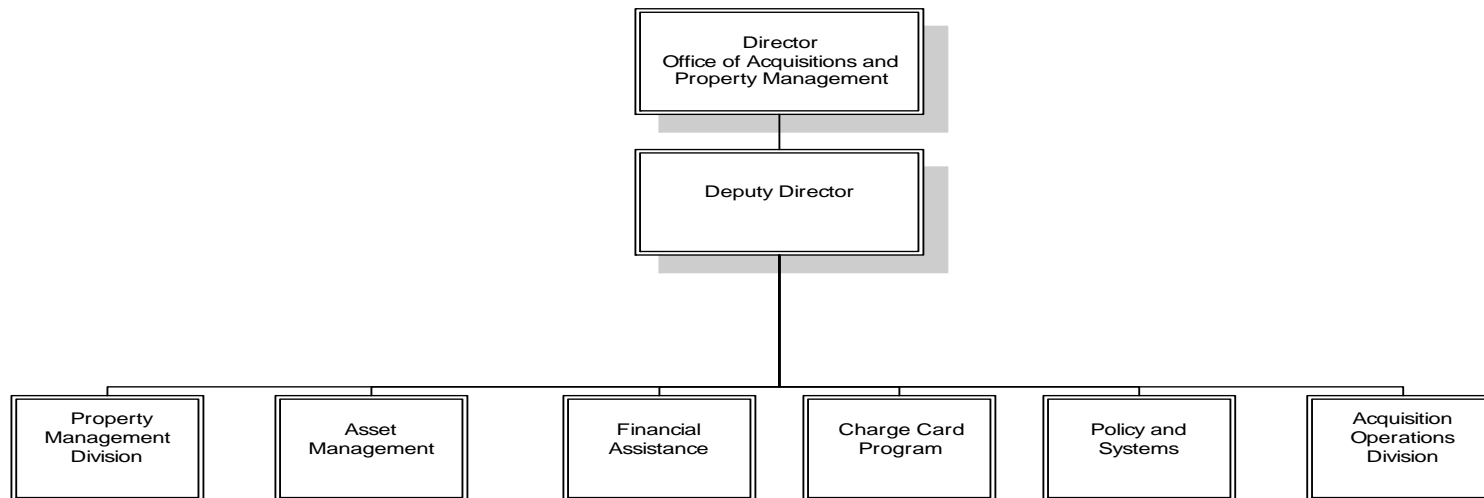


B. Acquisition and Contract Management

Finding: Acquisition Services Are Viewed As Slow and Not Customer Focused

Current State

The Office of Acquisitions and Property Management (OAPM) is an office within the Office of the Chief Financial Officer (OCFO). OAPM has a very broad and diverse scope of responsibilities. Not only is OAPM responsible for all procurements, but also it manages property for Indian Affairs.



Acquisitions

The OAPM is responsible for contract actions totaling approximately \$67.9 million. The OAPM functions include:

- Establishing and maintaining policies and procedures pertaining to procurement activities
- Acting as the warranted procurement officials
- Working as the Bureau Competition Advocates
- Serving as the Small Business Advisors
- Submitting information in response to Office of Management and Budget data calls related to acquisitions
- Managing the charge card programs throughout Indian Affairs

The Headquarters/Central Acquisitions Office is responsible for establishing policies and procedures to ensure procurement actions are done consistently throughout Indian Affairs. The Chief of the Acquisitions Management Division is located in Reston, VA. In addition to the Chief, there are eight Contract Specialists in Reston. Large procurement actions are usually completed by the Central Office. Since the centralization of support services, OAPM has not routinely published current policies and procedures on the intranet. Rather, OAPM communicates new policy information through conference calls, emails, and memorandums. Bronner received feedback that this communication method is inconsistent.

BIA and BIE

The Chief of Acquisitions Management is also responsible for management of the 45 Contract Specialists and nine Purchasing staff in the 12 BIA Regional Offices. The Acquisition staff is responsible for ensuring contracts, purchase orders, and other forms of obligations by the BIA and the BIE are done in accordance with procurement laws and regulations. As warranted officials, the Acquisitions staff works with program and



administrative offices to purchase needed goods and services. The Field staff duties include issuing the needed procurement actions, and closing-out contracts and purchase orders when the work is completed.

While there are Acquisition staffs in each BIA Regional Office, the first line supervisor may be located in a different Region. For example, there is no first line supervisor in the following Regions: Alaska, Eastern, Eastern Oklahoma, Midwest and Rocky Mountain. In these Regions, a procurement action must be approved by a supervisor in another Region which may cause delays. Further delays may occur in Alaska; because the sole Procurement Analyst's warrant is only for open market purchases of \$150,000 or less.

Furthermore, there is no specific acquisition team assigned to the BIE. The contracting needs of a school system are much different than a federal agency. For example, some text books are produced by only one publishing company. To require three independent bids is unfeasible. Similarly, purchasing for schools is on a different purchase schedule to ensure that all supplies and textbooks are delivered by the time school is in session. Unless BIE has a dedicated acquisition team that pro-actively addresses its needs, the schools will continue to experience shortages.

Contract Authority and Performance Measures

In the federal government, the authority to enter into contractual relationships and commit the government to the expenditure of public (taxpayer) funds is a delegated authority. In DOI, the Secretary's authority has been delegated to the Assistant Secretaries, their Bureau Heads, Head of Contracting Activities, Bureau Procurement Chiefs and appointed Contracting Officers. In April 2010, the DOI issued a policy that the contracting segment of the acquisition workforce must be certified at a level commensurate with their appointment level.⁸ In Indian Affairs, the contracting authority has been centralized in DAS-M.

Standard performance measures over procurement and financial reporting activities are limited. There is little benchmarking data currently available, such as: the time it takes for procurement actions to be

⁸Department of the Interior Policy Release 2010-11, dated April 8, 2010



completed, the time it takes to close-out contracts, and the number of contracts that start in one Regional Office and are modified in another Regional Office. The Acquisition Office provided Bronner a list of employees, their warrant authority and transactions processed in FY 2011. However, they did not provide information about the service area covered by each contract officer/specialist, the name and location of the second level approving authority for specific dollar level transactions, or the types of transactions processed. Also, at the conclusion of FY 2011 there were 839 transactions which were still open (not completed). Similarly, Bronner was not provided customer service data such as response times to phone calls and email inquiries.

Credit Card Program

The Acquisition Headquarters staff is also responsible for oversight of the government issued charge card program. Indian Affairs has an integrated charge card program, where one card can be used for travel, fleet, and purchases. Currently, there are over 10,000 cards issued to users in the Bureaus. There are three employees assigned to audit the charge card expenses. Working with the BIA Regional Directors, these individuals are responsible for reviewing the charges billed to Indian Affairs. In FY 2011, the staff did not meet their goals for credit card audits leaving Indian Affairs vulnerable to potential issues of waste, fraud, abuse, and mismanagement.

Employee and Tribal Leader Feedback

SURVEY RESULTS:

Non-DAS-M Survey Results	
Satisfaction with the time involved in awarding contract agreements 26.9% - very unsatisfied/unsatisfied 50.8% - neutral 22.3% - very satisfied/satisfied	Satisfaction with overall services provided by contractors 15.6% - very unsatisfied/unsatisfied 56.8% - neutral 27.6% - very satisfied/satisfied



EMPLOYEE FEEDBACK:

“Acquisition process is slow.”

“BIE needs own administrative services so they can run like a school system and order supplies and hire teachers.”

“Acquisitions are delayed because one person is handling up to 50 contract actions without any backup.”

“There is an increase in contract ratifications because contracts are not extended timely.”

“There are too many levels of approval required for a simple purchase request, such as furniture.”

“Lines of authority are blurred. There is no accountability over people in the Regions due to the lack of direct supervision.”

“We are understaffed in the Regions. Responsibilities have increased from one Regional Office to two Regional Offices and two program accounts, resulting in slow service and low morale.”

“Policy should remain in Headquarters and everything else should go to the Regions and be overseen by the Regional Director.”

“The Regions need the authority to make purchases.”



“Instead of telling what I can’t do, I would like the acquisitions staff to advise me about how to get contract accomplished.”

It takes a long time for someone to respond to my email and phone requests

TRIBAL LEADER FEEDBACK:

“Processes need to be streamlined and more organized.”

“Untrained staffs create delays.”

“Indian Affairs does not perform contract work timely.”

“Need to receive status updates on contract requests.”

“Need decision making authority at the Regional level.”

Peer Agencies

The **Indian Health Service** (IHS) employs a decentralized model of support services. Rather than control acquisitions centrally, each IHS Area Office has a Contracting Office. Service Units, that report to Area Offices, depending on size, have either a Contracting Officer or Procurement Clerk. The IHS Chief Contracting Officer is responsible for issuing warrants to Contracting Officers to purchase equipment and supplies. The level of the warrant is based on training and experience. The Chief Contracting Officer is also responsible for auditing procurement actions to ensure that proper internal controls are established and enforced.



Similarly, the **Fish and Wildlife Service** has local control of contracting with oversight and policy standards managed from Headquarters. The following chart describes the responsibility and accountability for each person involved with procurements:

Responsibilities for the Fish and Wildlife Service acquisition program	
Positions:	Responsibilities:
The Assistant Director - Business Management and Operations (AD-BMO)	<ul style="list-style-type: none"> ➤ Serve as Head of the Contracting Activity ➤ Ratify unauthorized commitments above the simplified acquisition threshold, and ➤ Ensure the integrity of acquisition system by ensuring compliance with acquisition-related laws, regulations, policies, and ethics rules.
Assistant Directors, Regional Directors, Assistant Regional Directors, and Regional Chief Financial Officers	<ul style="list-style-type: none"> ➤ Ensure that proposed acquisitions are necessary to support the mission, and ➤ Support acquisition-related requirements such as: <ul style="list-style-type: none"> ○ Advance acquisition planning ○ Socio-economic and environmental preference programs when acquiring goods and service ○ Ethical standards ○ Performance-based acquisitions, and ○ Full and open competition.
The Chief, Division of Contracting and Facilities Management (CFM), Washington Office	<ul style="list-style-type: none"> ➤ Develop and issue uniform acquisition policies and procedures ➤ Conduct acquisition management reviews of Regional contracting offices in accordance with the Government Accountability Office's (GAO) "Framework for Assessing the Acquisition Function at Federal Agencies" and Departmental guidance ➤ Promote full and open competition, and



Responsibilities for the Fish and Wildlife Service acquisition program	
Positions:	Responsibilities:
	<ul style="list-style-type: none"> ➤ Maintain the Department's data system used for reporting contracts to the central Federal Procurement Data System – Next Generation
Regional Chiefs, Contracting and General Services (CGS) and CFM Offices	<ul style="list-style-type: none"> ➤ Implement acquisition policies within the Region ➤ Conduct acquisition management reviews of field stations within the Region ➤ Serve as Assistant Bureau Competition Advocates, and ➤ Review contract files for compliance with acquisition policy and regulations
Supervisors of Contracting Officers	<ul style="list-style-type: none"> ➤ Provide on-the-job training for Contracting Officers ➤ Ensure the Contracting Officers they supervise comply with laws, regulations, and policy for acquisition matters and ethics, and ➤ Review contract files of the Contracting Officers they supervise for compliance with acquisition policy and regulations
Contracting Officers	<ul style="list-style-type: none"> ➤ Negotiate, award, administer, and terminate contracts; ➤ Make related determinations and findings; and ➤ Ensure compliance with all laws and regulations pertaining to an acquisition.

A hybrid structure for acquisitions and contracting is utilized by the **Executive Office for U.S. Attorneys** (EOUSA). The EOUSA Acquisitions Office staff provides logistical support to all U.S. Attorneys Offices in the areas of acquisition, procurement, and small purchases including records and forms management. The EOUSA Acquisitions Office is also responsible for policy development and dissemination. The policies are contained in the U.S. Attorney Procedures Manual, and the Manual is posted on the website. Contracting



Officers in the USAOs have a limited warrant (less than \$100K) that enables them to make small simplified acquisitions, such as for expert witnesses and furniture.

The **National Park Service (NPS)** employs a centralized procurement structure. The Harpers Ferry Center Office of Acquisition Management develops and implements policies to ensure compliance with federal, DOI, and NPS Acquisition Regulations and Directives. It negotiates and establishes contracts and assistance agreements for Harpers Ferry Center and the Appalachian Trail Project Office, as well as for parks and regions. The office maintains a negotiated Indefinite Delivery - Indefinite Quantity (IDIQ) contract network. Through its IDIQ contract network, the Harpers Ferry Center manages the Center's Task Order Assistance Programs, which allow parks and regions to work directly with many of the Center's IDIQ contractors.

A centralized model is also utilized by the **Forest Service**. The Washington DC Office Acquisition Management Office provides policy, oversight and operational support in the areas of Acquisition, Property Management, and Grants and Agreements. They provide centralized acquisition support for the Forest Service IT program and for Incident (Fire) resources. The operational support also includes general acquisition support for Forest Service Headquarters staffs, property surveys and disposal, and Washington Office facilities management.



Options to Improve the Acquisition Process

OPTIONS

Create teams of employees and managers to update all acquisition policies and procedures

Update Acquisition page on intranet to include current policies, procedures, templates and samples

Assign DAS-M Acquisition staff to service a specific BIA Region, BIE, and programmatic office and publish the assignments on the intranet

Provide proactive customer service that includes checklists and sample statements of work

Split OAPM into two offices: Office of Acquisition Management and Office of Property Management

Establish and enforce a policy that requires a 24-hour response time to all emails and phone calls

Streamline procurement and acquisition procedures to decrease layers of review that will improve processing time

Establish transparent and meaningful performance metrics that will provide objective data to support realigning acquisition employees to BIA and BIE

Meet yearly targets for federal credit card audits and initiate timely and appropriate corrective actions

Conduct a workload analysis of the Acquisition Management Division to determine:

- BIA Regional acquisition staff workload and the time to process contract actions
 - Supervisor workload and time to process contract actions
 - BIE acquisition volume, purchase types, and delays
 - Optimal staffing for BIA and BIE
-

Realign supervisory relationship of 45 Office of Acquisition & Management (OAPM) Field contract specialists from DAS-M OCFO to the BIA Regional Directors and/or the BIE Assistant Deputy Director for Administration. DAS-M OCFO/ to retain authority for Indian Affairs' acquisition policy, issuance of warrants, and training



The OAPM has a broad and diverse scope of responsibilities, including: procurement, charge card program management, property management, inventory of real property, and building leasing. During interviews and surveys conducted by Bronner, BIA and BIE employees expressed concern with the speed of the procurement/acquisition process. The volume of procurement actions appears to have overwhelmed the Headquarters/Central Office. At the same time, the Field purchase authority for non-contract specialists is severely limited to micro purchase authority for services up to \$2,500 and for supplies up to \$3,000. Thus, any purchases in excess of \$3,000 must be approved by a warranted contract officer in the OAPM Acquisitions Management Division. The organization and workload in OAPM is adversely affecting its ability to provide prompt and seamless service.

Some of the options to improve service involve improving communication and making minor adjustments in assignments to improve response time. Of course, these changes are not overly disruptive, but it is uncertain whether these changes will significantly improve service and accountability.

On the other hand, to retain Indian Affairs' successful financial and accounting internal controls, it is critical that transactions conducted in the Field are accurate and in compliance with all regulations. Currently, the OAPM acquisition staff in the Regions have warrant authority – some as much as \$10 million. To have this authority, the employee must have completed required certifications. The certifications function as an internal control for Indian Affairs. If the DAS-M Office of Acquisition Management conducted routine audits of the Regional acquisitions and enforced corrective action plans, decentralization of acquisitions is possible.

The more problematic roadblocks for decentralization concern both the lack of specific data concerning workload, e.g. type of transactions and service area covered, and the imbalance of acquisition staffing and supervision. Some BIA Regions (Alaska and Midwest) have only one acquisition staff member. Other BIA Regions (Alaska, Eastern, Eastern Oklahoma, Midwest and Rocky Mountain) do not have supervisory contract specialists. Work from these Regions must be sent to another Region for approval. And, BIE does not have any acquisitions staff assigned specifically to their program.



Currently, OAPM does not produce performance metrics to assist with an examination of workload and outcomes. In the short time allocated to Bronner's assessment, it was not possible to conduct an in-depth workload analysis of the Acquisitions Management Division. The Acquisition Division provided Bronner a list of employees, their warrant authority and transactions processed in FY 2011. For an adequate workload analysis, information about the service area covered by each Contract Officer/Specialist, the name and location of the second level approving authority for specific dollar level transactions, the organization (BIE/BIA) and location of the requestor, the types of transactions (new contracts or modifications), or the services/equipment purchased per transaction would also be required. Similarly, Bronner did not receive information about the amount of workload that was shifted throughout the year between offices. At the conclusion of FY 2011 there were 839 transactions which were still open (not completed). A workload analysis would analyze the causes of the open transactions. A workload analysis would also include data about response times to phone calls and email inquiries. Similarly, a workload analysis would examine a representative sample of transactions and map the path of each contract action to determine the number of steps and length of time from request to contract award.

Although this workload analysis would provide Indian Affairs with objective data from which to make staffing decisions, such a workload analysis could cost \$150,000 to \$350,000 depending on the scope of the review.

Recommendations

Indian Affairs would achieve improved customer service and accountability with local supervision of the Contract Specialists by the BIA Regional Directors or the BIE Assistant Deputy Director for Administration. To be successful, there must be sufficient controls and updated policies and procedures to ensure adequate stewardship and accountability of federal funds. As part of the transition process, Indian Affairs should consider streamlining processes and eliminating unnecessary approvals. Once the policies and procedures are updated they should be published on the intranet so that the rules are transparent.



Even before decentralizing authority for acquisitions, OAPM could improve its customer service by instituting a few key improvements. First, OAPM could split into two offices: Acquisition Management and Property Management. This split would focus management oversight on workload within their areas of expertise. Second, OAPM could realign its current staff to be more responsive. OAPM could assign staff in the Headquarters Acquisition Management Division to service a specific BIA Region, the BIE, and programmatic offices. These assignments should be published on the internet and intranet to improve transparency and accountability. By assigning a lead, with a back-up, to each BIA Region, BIE, and the Deputy Assistant Secretary – Policy and Economic Development (DAS-PED), OAPM would improve its ability to provide consistent and reliable service. To decrease the time lost with back and forth emails on contracting documents, OAPM could provide their clients with checklists and samples of approved statements of work that provide a go-by for the drafters. Third, OAPM must dispel its reputation for ignoring emails and phone calls by placing an emphasis on swift responses to inquiries.



IMPLEMENTATION PLAN

<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">1-6</p>	<ul style="list-style-type: none"> • Split the OFCO Office of Acquisition and Property Management into two offices: Office of Acquisition Management and the Office of Property Management • DAS-M OCFO/Office of Acquisition Management retains responsibility for Indian Affairs' acquisition policies and procedures, contract internal controls, audits of contract actions, training, corrections of procurement/acquisition audit findings and the Credit Card Program • Office of Acquisition Management, BIE and BIA collaborate to revise, update and disseminate acquisition policies, procedures, manuals, and authorities to reflect the changes in the supervisory chain of command for Field Contract Specialist employees, including approvals for contract actions • Conduct an internal review of processes and eliminate unnecessary approvals • Meet yearly targets for federal credit card audits and initiate timely and appropriate corrective actions
<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">7-12</p>	<ul style="list-style-type: none"> • Realign 45 Field Contract Specialists (and funded vacancies) to BIA and/or BIE supervision ensuring that sufficient Contract Specialists are assigned to BIE because contracting needs of a school system are different than a federal agency • Publish updated policies and procedures on the intranet so that the rules are transparent



C. Property and Facility Management

Finding: BIA Regional Directors Lack Authority for Property Management

Current State

Property Management is part of the Office of the Chief Financial Management organization. Property Management is a Division within the Office of Acquisitions and Property Management. The Property Operations Division, which is comprised of Regional Property Operations and Central Property Operations, is headed by the Director Field Property Operations, located in Phoenix, Arizona. In addition to the Director, the Central Property Management Office has seven employees. The remaining 36 positions are allocated for staff housed in the BIA Regional Offices.



The staff in the Division is responsible for the tracking of capitalized⁹ and non-capitalized¹⁰ real and personal property purchased or transferred in the field for the BIA, BIE, the BIA Office of Justice Services, and the DAS-M. There is currently \$3.4 billion in property reported. The property includes, for example, buildings, vehicles, computers, and guns.

The Phoenix/Central Office is responsible for:

- Establishing policies and procedures to ensure accountability and internal controls over property management activities
- Ensuring physical inventories are conducted correctly

⁹ Capitalized property is defined as any equipment valued over \$25,000, whose value also depreciates, e.g. buildings, vehicles, and guns.

¹⁰ Non-capitalized property is defined as equipment must be inventoried and is valued under \$25,000, e.g. computers, laptops, and servers.



- Ensuring that inventory discrepancies are reconciled to the Fixed Asset Subsystem (FAS)
- Providing direction to the day-to-day property management activities
- Overseeing corrective actions in response to audits
- Monitoring recordkeeping requirements and documentation of property transactions
- Monitoring the timely submission of all required reports

The Property Management employees located in the BIA Regional Offices are responsible for:

- Providing day-to-day guidance to property management staff in the Region
- Designating members of Boards of Survey
- Certifying purchases in the Department of the Interior Electronic Acquisition System (IDEAS) to ensure that purchases are recorded correctly
- Ensuring all property accountability responsibilities comply with established policies and procedures
- Preparing and maintaining all property accountability records
- Acting as the Regional Fleet Manager and randomly sample and audit vehicle fleet card statements to test for potential waste, fraud, abuse, or mismanagement
- Coordinating the utilization and disposal of excess personnel property
- Conducting annual physical inventories and reconciling discrepancies

Although the Field Property Management employees are physically located in the BIA Regional Offices, they are not supervised by the BIA Regional Director. Because there is capitalized and non-capitalized property in every BIA and BIE facility, employees in those facilities are assigned responsibility for property as a collateral duty. Thus, the staff may be faced with competing priorities that are not easily resolved by a Field Property Manager who reports to a manager in Phoenix.



Employee and Tribal Leader Feedback

SURVEY RESULTS:

Availability of Property Management policies, procedures, and manuals

Are up-to-date information about Property Management policies, procedures, and manuals readily available?	
<p>Non-DAS-M Survey Results 40.2% Non-DAS-M respondents indicated that such documents are not readily available</p>	<p>DAS-M Survey Results 31.3% DAS-M respondents indicated that such documents are not readily available</p>

Clarity of Communications:

Satisfaction with clarity of communications regarding Property Management policies:	Property Management clearly communicates policies and procedures to non-support offices:
<p>Non-DAS-M Survey Results 22.3% - very unsatisfied/unsatisfied 41.4% - neutral 36.4% - very satisfied/satisfied</p>	<p>DAS-M Survey Results 31.3% - strongly disagree/disagree 32.3% - neutral 36.5% - strongly agree/agree</p>



EMPLOYEE FEEDBACK:

“Local management is held responsible for inventory, but property managers do not report to them.”

“If I reported to the Regional Director I would receive the resources I need to do my job.”

“Policy and review can stay at Headquarters, but day-to-day activities should be managed by the Regions.”

“The Field Property Managers do a good job.”

“There is a lack of adequate internal controls to ensure that asset transfers and acquisitions are recorded properly.”

“Property is very important and things can go wrong if it is not monitored locally.”

“Property and facilities should be more connected.”

“The Central Property Operations Office has not distributed the property management policies and procedures to every facility.”

TRIBAL LEADERS FEEDBACK:

“The people I deal with the most are in the Regional Office. Why are they held back?”



Peer Agencies

The Property and Supply Management Branch in the **Indian Health Service (IHS)** Headquarters is responsible for planning, developing, and administering IHS policies on personal property and supply management in conformance with federal personal property and supply management laws, regulations, policies, procedures, practices, and standards. It also manages the Headquarters motor vehicles, personal property, special projects, and inter/intra agency activities. The Branch interprets regulations, as well as provides advice on execution and coordination of personal property and supply management policies and programs. It also administers management systems and methods for planning, utilizing, and reporting on administrative personal property and supply management programs, including the IHS personal property and supply accountability and controls systems.

IHS Area Offices have Property Management Sections that oversee property management for the programs in its respective Area. The Area Property Management Officer (PMO) is responsible for the effective control of acquisitions, and the use and disposal of personal property for their assigned accountable area. The PMO is responsible for ensuring that all standards and replacement standards for personal property are met throughout the Area.



The management of personal property in the IHS and Indian Affairs is similar in that both have Headquarters and Region/Agency components. The two agencies differ, however, in how the Field staff is managed. In the IHS, Field Property Management employees report to their respective Area Office management.

At the **Fish and Wildlife Service (F&WS)**, the Assistant Director for Business Management and Operations (ABMO) administers F&WS's personal property program and system. The ABMO's Division of Contracting and Facilities Management (CFM) is responsible for overseeing both personal and real property. At the Headquarters level, the CFM develops and implements personal property policy and



procedures, manages and maintains the Personal Property Management System (PPMS) – including certification and accreditation - conducts management control reviews of all Regions and Washington Office programs, prepares and coordinates F&WS data calls, audit requests, and reports, and finally, maintains personal property accountability records.

At the Regional level, Regional Directors are responsible for managing the personal property within his/her jurisdiction. Personal property matters are managed by a team of Property Specialists. This team is comprised of a Contracting and General Services (CGS) and CFM Chief, a Regional Personal Property Manager, Contracting Officers, and an Accountable Officer.

The Regional Directors serve as the property administrator for their Regions and implement the personal property program. The CGS and CFM Chief effectually serves as the Region's Property Officer. This position is responsible for: implementing personal property policies, procedures, and reporting and developing procedures that the Regional Director requires. The CGS and CFM Chief also establishes system-controlled personal property accountability records, and designates a Personal Property Manager for their Regions and ensures the designee accomplishes his/her responsibilities. Regional Personal Property Managers are the primary Regional contacts managing all aspects of the personal property program. They provide advice and guidance on day-to-day personal property matters.

In addition, the Regional Contracting Officer is the sole employee in the Regions who is authorized to procure firearms. An Accountable Officer, on the other hand, establishes and maintains accountability records to effectively control personal property. In addition, the Accountable Officer ensures personal property is inspected to account for proper use, maintenance, and safekeeping and establish procedures for repair and rehabilitation. Furthermore, the Accountable Officer performs physical inventories, reconcile discrepancies, and certify accuracy of inventories.



Similarly, at the **Executive Office of the United States Attorneys** (EOUSA) provides coordinated oversight of property management, but ultimately, personal property management is accountable at the U.S. Attorneys' Office (USAO).

Property management responsibilities at EOUSA includes: inventory, accountability of property, excess property, lost or stolen property and disposal of damaged property. At the Headquarters level, the EOUSA has an Accountable Officer who is the principal individual responsible for the accountability and control of personal property. Each U.S. Attorney serves as the Accountable Officer in his/her District, and is responsible for the accountability of personal property, supervision of property record keeping, and the certification of corrections of the annual inventory submissions for all offices under their supervision. Within each USAO is an Administrative Officer who serves as a Property Custodian who is responsible for the immediate physical custody of all property under his/her control, and for providing documentation as required on all actions affecting the property within his/her jurisdiction, except for property assigned to a Violent Crime Task Force (VCTF). In the event of the assignment to the VCTF, the VCTF will assign a member from the task force to serve as the Property Custodian to the assigned property.



The Assistant Director of Facilities Management and Support Services in the EOUSA plays the Property Management Officer role at the Headquarters, and is responsible for the overall administration, coordination, liaison activities and coordinator of the property management program with the EOUSA and all USAOs.

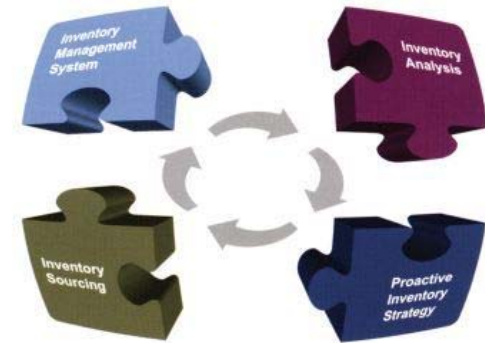
At the **National Park Services** (NPS) the property management structure is also similar to its peers at the F&WS and the EOUSA. Property and Space Management is under the Comptroller's Office. The Property Management Officer is responsible for overall administration, coordination, and control of the NPS Personal Property Program.



Each Regional Director is designated as the Property Administrator for his/her Region. Responsibilities of the Property Administrator include: ensuring accountability and control of personal property, as well as administrating the property program for the geographic areas under their jurisdiction. The Property Administrator is also responsible for dissemination and implementation of policy and guidance to subordinate or serviced offices.

To support the Regional Director with his/her Property Administrator role, each Regional Office is comprised of a Property Manager, an Accountable Property Officer, and a Receiving Officer. A Property Manager reports directly to the Regional Director, and is responsible for the day-to-day operations of the Region's property management program. In general, the Superintendent of a given Regional Office serves as the Accountable Property Officer, and is responsible for a specified group of property items and ensuring the establishment and maintenance of accountability records to provide for effective control over the assigned property.

In addition, each Regional Office has as many Custodial and Property Liaison Officers, Fleet Manager, and Firearm Custodians as necessary to control and account for personal property, manage NPS motor vehicle fleets, and ensure proper control and accountability for firearms. These positions also report directly to the Regional Director.



Options to Improve Indian Affairs' Property Management Program

OPTIONS

Establish a handbook on record keeping standards and internal controls over asset transfers, acquisitions, and inventory

Establish clear roles and responsibilities for BIA Regional Directors, Field Property Staff and Service Level Agreements for BIE facilities

Ensure the dissemination of Property Management policies and procedures to every BIA and BIE facility

Retain the Reston Property Management Division staff, but not the Field Property staff, and realign OCFO OAPM so that Property Management reports directly to the CFO

Retain the Regional and Central Property Divisions in DAS-M, but realign the Office of the Chief Financial Officer (OCFO) Office of Acquisitions and Property Management (OAPM) so that Property Management is a direct report to the CFO

Hire three additional Field Property Managers – one for each of the BIE Deputy Associate Directors' Offices

Realign the supervisory relationship of the 36 Field Property staff from DAS-M OCFO/OAPM to the applicable BIA Regional Director with Memorandums of Understanding with firm Service Level Agreements for property management at BIE facilities

Recommendations

Given the feedback from Indian Affairs employees and Tribal Leaders, as well as peer agency review and best practice research, Bronner recommends that Indian Affairs employ a hybrid delivery model for property management.



The OCFO Property Management Division headquartered in Phoenix, Arizona should develop the overarching policy and procedures for real and personal property management. The Division should also collaborate with the BIA Regional Directors to create clear roles and responsibilities for the Regional Director and his/her property management staff to establish unambiguous expectations. The policy and procedures along with roles and responsibilities should be documented into a handbook, and then disseminated to each Region and published on the Indian Affairs intranet.

In order for the hybrid model to be effective, Bronner recommends realigning the reporting relationship of the Regional property management staff so that they report directly to their respective Regional Director. This is an essential element of the hybrid model as Regional Directors and his/her property management staff are responsible for executing the property management program established by Headquarters. Currently, Regional property management employees report directly to Headquarters in Phoenix, and are not accountable to their respective Regional Directors. This poses a significant problem to effective property management, as Regional Directors are responsible for the overall management and accountability of property in their respective region, yet are unable to manage the staff executing the program. Realigning the reporting relationship will give the Regional Director the resources he/she needs to properly oversee the property management program in his/her Region.



Finally, Bronner recommends that the OCFO Property Management Division be a direct report to the Chief Financial Officer (CFO) and not be co-located organizationally with Acquisitions. This will eliminate an unnecessary layer of reporting. Moreover, acquisitions and property management do not share similar goals or functions. Thus, separating the two organizations will enable both organizations to better achieve their respective operational and strategic goals.



IMPLEMENTATION PLAN

<p style="text-align: center;">MONTHS 1-6</p>	<ul style="list-style-type: none"> • Realign the Office of the Chief Financial Officer (CFO), Office of Acquisition and Property Management (OAPM) so that Property Management reports directly to the CFO • DAS-M OCFO/Office of Property Management retains responsibility for Indian Affairs' real and personal property management policies and procedures, property management internal controls, management control reviews, training, and corrections of property management findings • DAS-M Property Management develops, collaboratively with BIA, clear roles and responsibilities for the Regional Director and his/her property management staff to establish unambiguous expectations • Document policy and procedures along with roles and responsibilities into a handbook, disseminate the handbook to each Region and publish it on the Indian Affairs intranet
<p style="text-align: center;">MONTHS 7-12</p>	<ul style="list-style-type: none"> • Realign the supervisory relationship of the 36 Field Property staff (and funded vacancies) from DAS-M Office of the CFO to the applicable BIA Regional Director



Finding: Facilities Management Needs to be More Innovative in Face of Shrinking Resources

Current State

The responsibility for facilities management is scattered between three Divisions. The Property Management Division in the OCFO is responsible for maintaining the real property inventory. The Acquisition Office in the OCFO manages the leasing of buildings for the BIA and BIE. Maintenance and construction of all Indian Affairs' buildings, however, is under the purview of the Office of Facilities, Environmental and Cultural Resources (OFECR), Office of Facilities Management and Construction (OFMC).

The OFMC headquarters operates out of Albuquerque, New Mexico, and is comprised of 46 employees – a majority who are engineers that work on construction projects. The OFMC is organized into three divisions:

- 1) **Planning and Programming:** Responsible for budget formulation and five year construction program preparation and preliminary design
- 2) **Design and Construction:** Responsible for completion of design of major construction projects including repair and new construction that exceed \$2,500 (i.e. roof replacement, new building, etc.)
- 3) **Facilities Operation and Maintenance:** Responsible for policy development for facilities maintenance, and preparation of a recommended funding allocation for facility operations and maintenance for BIE, BIA, and Public Safety & Justice (PS&J) facilities.



In addition to the Albuquerque Headquarters staff, 34 Regional Facilities Managers are dispersed across nine of the 12 Regional Offices. Those Regions include: Southwest (1), Great Plains (7), Southern Plains (2), Rocky Mountain (4), Midwest (1), Western (5), Navajo (11), Northwest (1), and Eastern (2). Regional Facilities Managers report directly to OFMC Headquarters in Albuquerque, NM. By design, three Regional Offices are



without Regional Facilities Managers: Alaska, Eastern Oklahoma, and Pacific. Alaska is without a Facilities Manager because there are no BIE schools located in the Region. Eastern Oklahoma is covered by the Regional Facilities Managers in the Eastern Region out of Nashville, Tennessee. The Pacific Region has insufficient workload to support a full-time Regional Facilities Manager.

The Regional Facilities Managers are the OFMC's representatives at the local level. They provide services to both the BIE schools and Education Line Officers and BIA local agencies, and Regional Directors. The



Regional Facilities Managers provide technical guidance pertaining to: engineering, architecture, maintenance, repairs, environmental remediation guidance, project budget formulation, and acquisition for maintenance and repairs. In addition, Regional Facilities Managers are frequently assigned project management responsibility for the design, acquisition and construction oversight of major projects. In addition, Regional Facilities Managers are responsible for working with both BIE and BIA in determining the priority of construction projects which cost in excess of \$2,500 and are funded within the Construction Appropriation.

The construction appropriation is managed at the headquarters level. The appropriation includes three major line items: 1) funds for BIA facilities, 2) funds for BIE facilities, and 3) funds for PS&J facilities. Each year, the Regional Facilities Managers prepare three separate priority lists – these lists are approved by the Directors of both the BIE and BIA. By a wide margin, BIE possesses the largest budget due to the number of schools under BIE's purview, followed by the PS&J, and then the BIA.

Operations and maintenance funding, however, is not a part of the construction appropriation, but is included in the fiscal year budgets of BIE, BIA, and PS&J.

The OFMC provides operational funds to BIA and BIE. Operational funds are used to cover utilities, phones and other operating costs of a facility. These costs are fixed for both the BIA and BIE. For the BIA, both



maintenance and operations (utilities and other expenses) are funded at 40% of estimated need. Whereas for BIE, maintenance is funded at 100% of estimated need, and operations is funded at 40% of estimated need. The BIA will generally allocate all of its funding at the beginning of the year. The BIE, however, allocates some of its operations and maintenance funds at the beginning of the year, and reserves the remainder of the funding in anticipation of urgent maintenance requirements that may arise over the course of the year.

For repairs amounting to less than \$2,500, each facility's maintenance fund is utilized to repair or replace items such as broken toilets, floor tile, or window panes. All maintenance work is scheduled at the local level for both the BIA and BIE. In the event BIA and BIE share the same federal facility, both BIA and BIE still manage separate maintenance funds. The only exception is in the Navajo Region, where BIE provides the maintenance services for BIA facilities. Repairs above the \$2500 limit must be coordinated with OFMC in Albuquerque, NM.



To make up for the short fall in operating funds, many times maintenance funds are used to cover fixed operating costs. This practice decreases the financial resources available to fund critical maintenance projects. These funding levels were set back in 2004 with Tribal Consultations and input from schools, but have not been revisited to ensure maintenance and operations are properly funded to meet current needs.

In the past, OFMC has proposed to assume the responsibility for maintenance of facilities for both BIE and BIA in order to achieve staffing and other savings particularly where BIE and BIA are co-located. However, since the No Child Left Behind legislation requires that all school maintenance workers be in the BIE chain of command, the OFMC proposal was not endorsed by the Office of the Solicitor.

Currently, Indian Affairs has a large backlog of outstanding maintenance projects. The high risk maintenance issues at BIE schools are of particular concern. Many of the maintenance backlog items involve safety violations in the schools managed by the BIE. At present, it would cost Indian Affairs \$600 million to



fix the deficiencies in the 68 highest risk BIE facilities. If Indian Affairs were to replace or perform building rehabilitation of these 68 highest risk BIE facilities, it would cost \$1.3 billion. Moreover, funding priorities have not changed to reflect current regulatory changes. For instance, with the No Child Left Behind legislation, BIE schools are required to make major repairs to and replacement of schools in order to be in compliance with federal law. Given current levels of funding, BIE is unable to meet these standards.

Employee and Tribal Leader Feedback

EMPLOYEE FEEDBACK:

“They should focus on fixing the school buildings instead of putting band aids on problems and expecting them to last 10-15 years.”

“Facilities are old. There is never a real solution to problems, only band aids.”

“Facility officer in Region should report to Regional Director.”

TRIBAL LEADERS FEEDBACK:

“Make the environment better so Native kids will attend Tribal schools.”

“Indian Affairs does not adjust funding for local conditions.”

Peer Agencies

The **Indian Health Service** (IHS) is responsible for planning, design, and construction of hospitals, health centers, substance abuse treatment centers, and staff quarters. Funding construction and maintenance at



the IHS is managed through its Division of Facilities Planning and Construction (DFPC). The mission of the DFPC is:

To promote and facilitate engineering planning and construction support for the IHS national facilities program by developing and enhancing relationships among Tribes, Area Offices, and Service Unit engineers and related professionals dealing in building health care systems.

The DFPC responsibilities and functions include:

- Maintaining a priority list based on relative need
- Supporting tribes when they choose to assume facilities-related responsibilities
- Planning health care and associated facilities to minimize facility life-cycle costs
- Planning, promoting, & constructing improvements to existing facilities where they are not optimally functional
- Planning & constructing new facilities when existing facilities do not exist or cannot be effectively improved
- Developing state-of-the-art facilities with efficient and effective facilities planning
- Targeting the unmet need with limited resources for maximum effectiveness

Section 301 of The Indian Health Care Improvement Act, Public Law 94-437, directs the IHS to identify planning, design, construction, and renovation needs for the 10 top-priority inpatient care facilities, the 10 top-priority outpatient care facilities, and to submit those needs through the President to the Congress.



In response to this directive, the IHS developed the Health Facilities Construction Priority System (HFCPS) methodology. Under the three-phase HFCPS process, the IHS solicits proposals for health facility construction, and ranks them according to their relative need for construction. The highest ranking proposals are added to the Priority Lists. After projects are placed on the Priority Lists, the IHS updates its 5-year planned construction budget. That budget is updated yearly and used as the basis for requests. This process is dynamic and takes into consideration changing priorities that may occur year-to-year.

The Assistant Director, Facilities Management and Support Services (FMSS), Executive Office of the United States Attorneys (EOUSA), is the designated authority to acquire or release space, certify and fund construction and alteration projects, approve Occupancy Agreements, and monitor and maintain the overall space inventory for U.S. Attorneys' Offices (USAOs). The EOUSA utilizes a centralized model to manage new construction, remodeling, and maintenance. The USAOs must submit requests for new or remodeled space to the FMSS for action with the General Service Administration. Construction and maintenance/remodeling funding decisions are made by the EOUSA in consultation with the U.S. Attorneys.

The Department of the Interior – inclusive of the **Fish and Wildlife** (F&WS), the **National Park Services** (NPS), and **Indian Affairs** – has been faced with many challenges with funding maintenance projects. In her March 1, 2011, testimony, Acting Inspector General Mary L. Kendall testified before the House Committee on Appropriations, Subcommittee on Interior and Related Agencies that:



The Department is responsible for roads, bridges, schools, office buildings, irrigation systems, and reservoirs for which repair and maintenance have been postponed because of budgetary constraints. The Department's FY 2010 estimate to correct deferred maintenance, the Department's term for unfunded repair and maintenance needs, ranges from \$13.0 billion to \$19.2 billion. Deterioration of assets, because of uncorrected deferred maintenance, poses health and safety hazards.



The inability to meet maintenance needs is a Department-wide challenge. Regardless of funding formulas, budget constraints have plagued the Department to meet its repair and maintenance needs.

Options to be More Innovative in Face of Shrinking Resources

OPTIONS

BIA and BIE, in collaboration with the OCFO Budget

Formulation staff, advocate for an increase in operations funding to 70% of estimated need

Realign all or most of the 34 Regional Field Managers to the

respective BIA Regional Directors to eliminate unnecessary layers of reporting and increase efficiency

BJA Regional Directors enter into Memoranda of

Understanding (MOUs) with specific Service Level Agreements (SLAs) with BIE to provide sufficient facility management services for BIE schools

DAS-M Property Management develops and disseminates

construction and facilities management policies and procedures, performs audits of construction projects, and coordinates dissemination of operations and maintenance funds

Pool all maintenance funds into one account. Use funding to address immediate maintenance needs, or address hazards that are prevalent system-wide

Explore partnerships with other DOI components, Regions, or Federal agencies in urban areas to co-fund maintenance activities that are mutually beneficial

Increase immediate local fiscal authority to \$25,000 (with necessary controls) to increase the local capacity to meet maintenance needs of BIE schools



Recommendations

At the Headquarters level, OFMC should be responsible for the development and dissemination of construction and facilities management policies, audits of construction projects, and coordination of the dissemination of operations and maintenance funds. The OFMC should also play a more active role in setting funding and project priorities with the Directors of BIA and BIE. For instance, based on data collected on Indian Affairs facilities, OFMC can identify specific facilities that need immediate attention, or identify a specific hazard that needs immediate attention – system wide.

To increase operational effectiveness, Bronner recommends realigning the reporting relationships of the 34 Regional Facilities Managers to report directly to the respective BIA Regional Directors. The realignment will provide the Regional Directors the authority and responsibility for facility management of the BIA administrative buildings, as well as PS&J detention facilities. In order to guarantee that the facility management needs of BIE schools are met, the BIA Regional Directors should enter into Memoranda of Understanding (MOUs) with the BIE school officials within their regions. To ensure clear communication and expectations, the MOUs should include Service Level Agreements (SLAs) that define the level and timeliness of the service BIA will provide to BIE. The SLAs will vary Region-by-Region because they should be customized to reflect local conditions and needs.

To improve Indian Affairs' capacity to maintain its schools, Bronner also recommends increasing local authority to use maintenance funds for school repairs from \$2,500 to \$25,000 – with the necessary controls.

To address historical gaps in maintenance and operational funding, Bronner recommends that OFMC leadership and the BIE and BIA Directors collaborate with the OCFO Budget Formulation staff to advocate for an increase in operational assistance to 70% of estimated cost for both the BIA and BIE.



When the operational funds are not funded adequately, BIA and BIE leadership are forced to take funding from the maintenance accounts. Funding BIA and BIE operational accounts at 40% of estimated need is one major obstacle preventing BIA and BIE from meeting its facility maintenance needs. As discussed by Acting Inspector General Mary L. Kendall, “Indian Affairs – along with the rest of the Department – has been faced with major budget constraints. Thus, Indian Affairs’ ability to meet its responsibilities to maintain and repair roads, schools, and office buildings across Indian Country is limited. Given budgetary constraints, it is unrealistic to fix all deficiencies or rehabilitate all buildings with deficiencies in the next several years.”

Instead, Bronner recommends that OFMC work with the Directors of BIA and BIE to consider pooling some or all maintenance funds and create a priority system to determine which maintenance projects should be funded. The priority system may be used to: 1) target specific hazards that are prevalent across all facilities (i.e. mold, rodent infestation, etc), or 2) target specific buildings. The point is not to take away BIA and BIE’s ability to make simple repairs or replacements on its own, but instead to create a way to address pressing facilities’ maintenance issues more systemically.

One recommended method of utilizing the pooled maintenance funds requires the OFMC to take the lead in gathering data and identifying what hazard to treat. For instance, OFMC may decide to address the presence of mold in schools during a single fiscal year. The pooled maintenance monies will be dispersed to targeted schools with the mold issues. The BIE schools, in return, will use the funds to treat the mold present at their facilities, and must be do so within the fiscal year. Monies not used for the treatment of mold will be returned to the pooled maintenance fund managed by OFMC.

Another recommended method of utilizing the pooled maintenance funds is to target specific buildings. Indian Affairs may adapt a similar system utilized by Indian Health Service through a competitive process. This priority system should be part of the yearly budget formulation process and take into consideration:



estimated budget, total number of people impacted, a description of unabated safety hazard(s), and a discussion whether or not the building is one of the 68 highest risk facilities.

In addition, Regional Facilities Managers should explore partnerships with other DOI components, Regions, and/or Federal agencies to co-fund maintenance projects that are mutually beneficial. In general, these types of partnerships are most conducive in urban areas and cities. Maintenance funds are low across the Department, but not depleted. Thus, it is important for the leaders across DOI to find creative ways to manage and maintain their buildings - even under tight budgetary constraints. Sharing costs for a mutually beneficial maintenance project is a great way to stretch limited dollars.



IMPLEMENTATION PLAN

<p>MONTHS</p> <p>1-6</p>	<ul style="list-style-type: none"> • DAS-M Office of Facilities Management and Construction (OFMC) retains responsibility for construction and facilities management policies and procedures, conducts audits of construction projects, and coordinates the allocation of operations and maintenance funds • DAS-M OFMC develops, collaboratively with BIA, clear roles and responsibilities for the Regional Director and his/her Facility Management staff and publishes revised policies and procedures on the Indian Affairs intranet • Increase local authority to use maintenance funds for school repairs from \$2,500 to \$25,000 – with the necessary controls • In order to guarantee that the facility management needs of BIE schools are met, the BIA
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	<p>Regional Directors enter into Memoranda of Understanding (MOUs) with the BIE school officials within their regions. The MOUs include Service Level Agreements (SLAs) that define the level and timeliness of the service BIA will provide to BIE.</p>
<p>MONTHS</p> <p>7-12</p>	<ul style="list-style-type: none"> • Realign the supervisory relationship of the 34 Field Facility Managers (and funded vacancies) from DAS-M OFMC to the applicable BIA Regional Director • OFMC leadership and the BIE and BIA Directors collaborate with the OCFO Budget Formulation staff to advocate for an increase in operational assistance to 70% of estimated cost for both the BIA and BIE • Explore partnerships with other DOI components, Regions, or Federal agencies in urban areas to co-fund maintenance activities that are mutually beneficial • Pool all maintenance funds into one account. Use funding to address immediate maintenance needs, or address hazards that are prevalent system-wide.



D. Human Resources

Finding: The Current Human Capital Organization Is Not Responsive to Programmatic Needs

Current State

The Indian Affairs' Office of Human Capital Management (OHCM) is tasked with recruitment, classification, labor relations, employee relations, benefit packages, employee development, and personnel security. Though OHCM's management is centralized, OHCM Human Resources Specialists are located in Anadarko, Oklahoma; Albuquerque, New Mexico; Billings, Montana; Portland, Oregon; Reston, Virginia; and at the Department of the Interior (DOI) in Washington, D.C. With approximately 100 employees, OHCM is one of the largest offices under the Deputy Assistant Secretary – Management (DAS-M).

Recruitment and Staffing

The Human Resources staff in Anadarko provides classification and staffing services for the Bureau of Indian Affairs (BIA) Regional Offices, except for the Southwest, Western and Rocky Mountain Regions. Human Resources staff in Albuquerque provides classification and staffing services for the BIA Southwest and Western Regions, as well as the Bureau of Indian Education (BIE), which includes staffing for both Title V (federal employees) and contract educators. Human Resources staff in Billings provides classification and staffing for the BIA Rocky Mountain Region. The Human Resources employees have on-site supervisors with managers in Reston, Virginia.

In 2009, in compliance with the DOI Policy on Human Capital Accountability and Program Evaluation, the Department conducted a review of the OHCM Center for Recruitment in Albuquerque. The DOI 2009 Human



Capital Accountability Review (HCAF) Report noted numerous irregularities, including prohibited personnel practices. The findings were so egregious that the HCAF team recommended that all Delegated Examining Unit (DEU)¹¹ activities be suspended and reassigned to the Center for Recruitment – Anadarko.

A follow-up HCAF team conducted a review in May 2010. While there were improvements, the team still found significant errors, such as the failure to describe specialized experience appropriately, which required a corrective action plan. Overall, the HCAF team recommended more training for the Human Resources Specialists to ensure a satisfactory level of practice. The team also surveyed supervisors and managers who are serviced by the Albuquerque Center. The team found that the majority of those surveyed were very frustrated with customer service. The HCAF finding is consistent with the feedback Bronner received in 2011.

Of special concern to the BIE managers and supervisors, whose staffing is managed by the Center for Recruitment – Albuquerque, is the perceived lack of understanding, on the part of the staffing specialists, of the qualifications for specialized educators, such as Reading Specialists and Special Education Teachers. While BIE managers and supervisors recognize the importance and statutory requirement for Indian Preference, they are concerned that individuals are deemed minimally qualified without sufficient education or experience. In addition, BIE managers are frustrated by the timing of the hiring process because teachers do not receive clearances in time for the beginning of the school year.

The human resource staff in Reston provides classification and staffing support for the Assistant Secretary – Indian Affairs (AS-IA) and for BIA Justice Services. One Human Resources Specialist in Reston is responsible

¹¹ Delegated examining authority is an authority the Office of Personnel Management (OPM) grants to agencies to fill competitive civil service jobs with: 1) applicants applying from outside the federal workforce; 2) federal employees who do not have competitive service status; or 3) federal employees with competitive service status. Appointments made by agencies through delegated examining authority are subject to civil service laws and regulations. This is to ensure fair and open competition, recruitment from all segments of society, and selection on the basis of the applicants' competencies or knowledge, skills, and abilities (see 5 U.S.C. § 2301).



for SES hiring and coordination for both BIA and BIE. Another Human Resources Specialist is responsible for developing, maintaining and distributing all human resources policies and procedures.

Job Announcements

All vacancies for positions in Indian Affairs are posted on www.USAJOBS.gov (USAJOBS), the federal government one-stop shop for employment opportunities. Despite some recent software issues, USAJOBS is an effective nationwide recruiting tool. However, the application process can be daunting for some applicants who are not familiar with on-line applications.



Best practice federal agencies compensate for the non-personal nature of USAJOBS by creating an enticing “Jobs” webpage on their internet site. The Indian Affairs “Jobs” webpage is less than dynamic.¹² The webpage does not have descriptions of the variety of jobs performed by Indian Affairs employees, or a connection to the mission. The “Jobs” webpage includes two forms for Indian Preference, a link to www.USAJOBS.gov, and links to Indian Affairs’ Facebook page and Twitter feed – both platforms are used to list Indian Affairs vacancies and news announcements.

In addition, the Indian Affairs Human Capital webpage is not appealing to applicants or current employees.¹³ The site provides a link to USAJOBS’ main page, but does not direct job seekers to specific Indian Affairs’ job listings. The webpage provides Indian Preference forms, outdated GS Salary tables (2009), and a description of a leadership program that is no longer funded.

¹² <http://www.bia.gov/Jobs/index.htm>

¹³ <http://www.bia.gov/WhatWeDo/ServiceOverview/EmploymentOpportunities/index.htm>



Personnel Security

OHCM is responsible for managing the process for clearing employees and contractors for access to DOI property and IT systems. While the Office of Personnel Management (OPM) conducts the background investigation, the OHCM Human Resources Specialists are responsible for providing the security forms to applicants.

While the OHCM provides the security forms to applicants using the federal government's Electronic Questionnaires for Investigations Processing (e-QIP) system, OCCH is less successful in actively managing the rest of the process. The Specialists do not report on performance metrics for each step in the process. For example, if the applicant does not return the forms in 10 days, the Specialist does not contact the applicant and warn the applicant of the consequences for failing to submit the forms. If the forms are not returned within 14 days, the Human Resources Specialist does not contact the Hiring Manager to elicit assistance in communicating with the applicant. If the personnel security process is managed aggressively, applicants can obtain clearances in four to six months. Alternatively, if an applicant does not return the security forms timely, the Hiring Manager may rescind the offer, and make an offer to another applicant on the hiring certificate.



Retirement Services and Benefits

Employee benefits are managed by the Human Resource Specialists in DC and Reston. Prior to Fiscal Year (FY) 2011, retirement services were managed by contractors. Because of funding constraints, the contract was not renewed. The OHCM did not have available data for Bronner to analyze whether retirement services for employees was adversely affected by the change in service providers.



Succession Planning

The OHCM has not developed policy and workforce plans for managing the Indian Affairs' or DAS-M's workforce. Currently, 13.11% of all Indian Affairs employees are eligible to retire. Over the next five years, an additional 8.47% of all Indian Affairs employees will be eligible to retire. An even greater number of the DAS-M workforce, 21.1% (138 employees) is currently eligible to retire. Over the next five years, an additional 18% of the DAS-M workforce will be eligible to retire – an additional 119 employees. The Human Resource Management occupational series (201) has the largest number of current eligible retirees (13 employees) as well as the largest number of eligible retirees over the next five years (14 employees). The OHCM has not developed a succession plan for the OHCM or DAS-M.

Labor Relations

All Indian Affairs employees, who are covered by a bargaining unit, are represented by the Federation of Indian Service Employees (FISE), except for three employees in the Office of Public Affairs who are covered under the American Federation of Government Employees (AFGE), and approximately 45 employees in Coolidge Arizona are covered by the International Brotherhood of Electrical Workers (IBEW).

The current collective bargaining (CBA) has expired, but negotiations continue. The Director of OHCM acts as lead negotiator for Indian Affairs management. The DOI Office of Human Capital and Diversity is also assisting with the CBA negotiations.

Employee relations work for all of Indian Affairs is managed from Portland, Oregon at the Center for Conflict Resolution by a Supervisor, two Labor Relations Specialists, and an administrative support employee. Even



though Indian Affairs has a low grievance caseload¹⁴, three trained Labor Relations Specialists for approximately 8,500 employees is insufficient.

The Office of Regulatory Affairs and Collaborative Action manages the Alternative Dispute Resolution (ADR) program for Indian Affairs.¹⁵ The ADR program includes CORE PLUS (Conflict Resolution PLUS) which provides impartial and confidential assistance to any Indian Affairs employee seeking to improve or resolve a workplace issue or concern. The Office of Regulatory Affairs and Collaborative Action receives approximately 12 inquires per month concerning workplace issues. The office also provides mediation services to resolve workplace issues. The distinction between the OHCM Conflict Resolution function in Portland and the responsibilities of the Office of Regulatory Affairs and Collaborative Action is unclear.

Employee and Tribal Leaders Feedback

SURVEY RESULTS:

Up-to-date information about Human Resources policies, procedures, and manuals are readily available in either hard copy or online	
Non-DAS-M Employee Survey Results 21.5% of Non-DAS-M employees indicated such documents are not made available	DAS-M Employee Survey Results 18.4% of DAS-M employees indicated such documents are not made available

¹⁴ The low rate of grievances is contrasted with the large number of Equal Employment Opportunity (EEO) complaints filed by employees in Indian Affairs.

¹⁵ The Office of Regulatory Affairs and Collaborative Action is not currently represented on the Indian Affairs organization chart. The Director of the Office reports to the Principal Deputy Assistant Secretary and has a collaborative working relationship with the Deputy Assistant Secretary –Management (DAS-M), attending the bi-weekly DAS-M meetings.



Employees are aware of my point of contact for Human Resources issues	
Non-DAS-M Employee Survey Results 71.0% - yes 29.0% - no	DAS-M Employee Survey Results 39.9% - strongly disagree/disagree 17.7% - neutral 42.4% - strongly agree/agree

Clarity of communications regarding Human Resources policies and procedures	Human Resources clearly communicates policies and procedures
Non-DAS-M Employee Survey Results 35.1% - very unsatisfied/unsatisfied 31.9% - neutral 33.0% - very satisfied/satisfied	DAS-M Employee Survey Results 38.2% - strongly disagree/disagree 28.8% - neutral 33.0% - strongly agree/agree

Satisfaction with clarity of directions provided by support services regarding human resource questions
Non-DAS-M Employee Survey Results 33.3% - very unsatisfied/unsatisfied 32.8% - neutral 33.8% - very satisfied/satisfied

Satisfaction with the process time of hiring new personnel
Non-DAS-M Employee Survey Results 56.1% - very unsatisfied/unsatisfied 28.6% - neutral 15.3% - very satisfied/satisfied



EMPLOYEE FEEDBACK:

“The Western Region is the largest Region and its Human Resources staffing services are split between Albuquerque and Anadarko. The process is ineffective and does not serve the employees.”

“Human Resources staff located in my Region should report to me so they are held accountable.”

“The HR services are fragmented so you have to go to several offices to obtain all HR services.”

“It takes too long to receive HR help addressing problem employees.”

“Responsibility for HR policy should remain at Headquarters.”

“HR staff is slow to answer questions.”

“There is not enough staff to get the work done.”

“As managers we need HR staff that is available to communicate with us and provide timely, accurate information.”

“Policy functions should stay in the Central Office and all other functions should move to the Regions.”

“HR staffs are non-responsive to calls, emails, or inquiries.”

“Recruiting and hiring should be done locally and not have to go through another Region.”



“The worst part of the centralization was HR because they won’t communicate.”

“Labor relations is responsive, not the staff in Anadarko.”

“HR presence is needed in each Region.”

“We need consistent position descriptions with a consistent description of duties.”

“Labor relations policy needs to be managed centrally.”

TRIBAL LEADERS FEEDBACK:

“It takes too long to fill key vacancies.”

“The Region is staffed with good people who cannot keep up because there is too much work.”

“Regions are understaffed.”

“Problem employees are just reassigned.”

“Indian preference in hiring is important.”



Peer Agencies

In the **Indian Health Service** (IHS), Human Resources (HR) offices are located at the Headquarters, Area Offices, and at the larger Service Units. Currently, there are approximately 130 full-time equivalent (FTE) employees that provide HR services for approximately 13,800 civilian employees. The Headquarters HR program handles all HR activities for the Headquarters programs, and develops policies and procedures that provide direction to all IHS HR activities. The policies and manuals are posted on the intranet and internet.

For service delivery, unlike Indian Affairs, IHS has decentralized all of its HR services to the Regional and Area Offices and, in some cases, to Service Units. At a minimum, there is a HR office in each Area. Employees in IHS are located geographically close to their assigned HR Specialist.

This organization of HR activities is fairly new. In the early 2000s, the U.S. Department of Health and Human Services (HHS) centralized all HR functions. The Department assigned IHS to the HHS HR Office in Baltimore, Maryland. After a few years, it became apparent that centralization was not working for IHS. The centralized model, however, did not adequately service the geographically diverse locations of IHS facilities. Moreover, the Baltimore HR Staff lacked the knowledge to properly apply Indian Preference – thus resulting in many errors. Because of these problems, the HHS permitted the IHS to decentralize its HR function.

The IHS has designed efficiencies by centralizing some HR functions within the Regional Offices. For these specific centralized functions, such as labor relations, the IHS has divided the Area HR functions into Regional Offices that can cover up to three Area Offices. Each Region has been organized with the same divisional titles – with each division assigned the same functions and tasks. The IHS has also utilizes HR systems such as Integrated Time and Attendance System, e-OPF, My Pay (through the Department of Defense), and e-Induction.



Personnel Security Clearances

The Indian Health Service has initiated improvements to significantly improve hiring time. Until recently all personnel investigations were conducted by the IHS Headquarters office. In FY 2011, the responsibility for initiating an investigation through OPM was delegated from Headquarters to the Area Offices. Now, the Authorized Approver at the Area Office manages the Non-Sensitive (level 1) and National Security (Levels 2 through 4) clearances in the e-QIP system.¹⁶ The Authorized Approver tracks each stage of the process including when OPM completes the investigation. The OPM still returns the result of the investigation to the IHS Headquarters Program of Integrity and Ethics (PIES) for adjudication. After the information is adjudicated, the PIES notifies the Area Office of the investigation result. This new process has reduced the time to complete the investigation, and hire the individual. Presently, it takes four to seven months from the hiring selection until the applicant is on board.



For recruiting new employees, the **Fish and Wildlife Service** (F&WS) has a strong positive presence on the internet. The F&WS human capital website articulates why the F&WS is the employer of choice.¹⁷ A job seeker is presented with a webpage with employees describing “A Day in the Life”¹⁸ and a “Meet Your New Boss” video.¹⁹ There is also a direct link to F&WS’s open positions on www.USAJOBS.gov. Moreover, F&WS’s vacancy announcements are enticing. For example, one vacancy announcement begins with: “You too can make a difference in our world. The work of the US Fish and Wildlife Service is meaningful and



Join Us and Grow!

¹⁶ However, requests to initiate investigations for public trust positions (Security levels 5 and 6) must still be submitted to IHS Headquarters for review and submission to OPM using e-QIP.

¹⁷ http://www.fws.gov/humancapital/job_seekers.html

¹⁸ <http://www.fws.gov/jobs/dayinthelife.html>

¹⁹ http://www.fws.gov/humancapital/video/meet_new_boss.html



varied.” The vacancy announcement then invites job seekers to watch two short podcasts: “Meet Your New Boss” and “Diversity Is Our Strength.”

Another announcement encourages applicants with this introductory language:

Working for the U.S. Fish and Wildlife Service is more than a career. It is a commitment shared by more than 9,000 men and women representing a diverse range of professions, backgrounds, and specialties who are dedicated to conserving, protecting, and enhancing fish, wildlife, plants, and their habitats. From the Arctic Ocean to the South Pacific, from the Atlantic to the Caribbean, Service personnel are working hard to ensure future generations will be able to enjoy nature's beauty and bounty.

The F&WS human capital webpage also provides a link to fact sheets with information about federal benefits, student opportunities, and work/life balance.²⁰

The **Executive Office for the United States Attorneys** (EOUSA) Personnel Office staff provides the 94 United States Attorneys’ Offices (USAOs) with a wide variety of personnel, payroll, and pre-employment security/suitability administrative services. The EOUSA Personnel Offices serves the Attorney General's Advisory Committee by recommending personnel policies, including the development and implementation of the administratively determined pay plan for attorneys.

Approximately 30 USAOs are considered small offices. Small USAOs are comprised of approximately 35-45 attorneys, and do not have a Personnel Office. Instead, human resources services are provided by the EOUSA Personnel Office. In mid-size offices (approximately 50-75 attorneys), personnel specialists are limited to processing awards, promotions, and within-grade-increases. Benefit and retirement counseling is conducted

²⁰ <http://www.fws.gov/humancapital/News.html>



by the EOUSA Personnel Office. Large and very large USAOs (over 100 attorneys) provide a full-range of human resources activities; except suitability determinations.

The EOUSA has limited the number of USAOs that have delegated examining authority. The EOUSA limits the number of delegated examining authority units (DEU) to only very large USAOs (150 attorneys or more) as the work is very technical and requires specialized skills to reduce the risk for errors.

From its inception, the **National Park Service** (NPS) employed a fully decentralized human resources function. At one point, NPS had 111 Personnel Offices. However, familiarity with human resources policies and procedures varied from office-to-office. For instance, smaller offices possessed less knowledge of personnel services, such as retirements or conversion of term positions to permanent. This inexperience with certain personnel actions created a higher than expected error rate. At one point, only 76 out of 111 personnel offices met Office of Personnel Management (OPM) standards.

In response, NPS implemented a hybrid solution for the delivery of human capital services. By centralizing more specialized human resources functions, such as classification, NPS has been able to improve consistency and overall service quality. The NPS has a dedicated group of employees at two centralized Human Resource Operations Centers (HROC), with specialized knowledge of specific processes, such as position classification, benefits, and Standard Form (SF) 52/50 processing. These centers are adequately staffed with 80 highly competent Human Resource Specialists. Moreover, processing time goals and metrics are transparent throughout the organization.

At the same time, NPS consolidated the 111 Personnel Offices into 23 Servicing Human Resource Offices (SHRO). Each of the seven Regional Offices has a Human Resources Office. In addition, each Region has at least one SHRO that manages the personnel activities for a number of assigned parks. As part of the initiative, NPS invested in training Personnel Specialists to satisfactory skill levels and competency in using the automated human resources information systems.



Each Region determines the adequate number of SHROs for its respective Region, with SHRO staff reporting directly to the Region's Human Resources Manager. Each SHRO employs at least four to five Human Resources Specialists, with a target grade of GS-12. Only one Specialist at each SHRO is certified for DEU staffing to decrease audit issues. The Human Resources Specialists at the SHROs have direct relationships with the management and employees at their assigned parks. Eighty percent of the Specialists are located within an hour driving distance to their assigned parks. In Alaska, Specialists use video-teleconferencing to communicate with their clients.

The NPS also hires a large number of seasonal employees for the parks. The NPS receives approximately 75,000 applications for seasonal Park Ranger and Park Guide positions. To process applications in time for new staff to be on board by early summer, the NPS centralized the seasonal recruitment process to the Harpers Ferry, West Virginia location, which is staffed with six full-time Human Resources Specialists dedicated to the effort. Recruitment begins early in the fiscal year and the Harpers Ferry Office issues approximately 700 certifications to the hiring officials. Centralization for this particular hiring action improved efficiency and effectiveness.

Faced with ranking 139 out of 224 in the 2010 Best Places to Work list, the NPS engaged a consultant to assess the causes of their continued decrease in rank since 2002. Through focus groups and interviews, the consultant determined that the driving concerns were hiring, leadership, workplace enrichment, and career advancement. In FY 2011, the NPS instituted a number of changes to address these issues. The NPS has yet to see the success of their efforts as their rank dropped to 163 in the 2011 Best Places to Work list.

The **U.S. Forest Service** began centralizing the human resources management structure in 2006. This staged implementation, which spanned over a period of several years, resulted in relocating most human resources positions to the Albuquerque Service Center. Although, the Forest Service developed a small number of Human Resources Liaison positions to provide advice and counsel to managers across multiple field units.

Working for the Great Outdoors



Under the new centralized organization, however, all human resources employees reported to Human Resources management rather than field-unit management.

Unfortunately, the centralization of human resources functions at the Forest Service caused widespread employee frustration. To alleviate some of the frustration, the Forest Service redesigned its human resources management program. Under the redesign, the Forest Service assigned teams of nine to 64 human resources employees to each Region dependent on the size of the Region.

To this end, the Forest Service leadership gave human resources management the authority to hire up to 208 additional full-time staff to make up the Regional service teams. These teams assist managers in field units with four specific services: position classification, hiring, employee relations, and labor relations. Although the service teams remain within the human resources management organization, their goal is to develop a relationship of shared accountability with Regional leadership, so that Regional leadership will have more influence on certain aspects of Human Resources work. This redesign was implemented using an "adaptive management approach," under which field-unit leadership had the flexibility to influence the work carried out by the service team assigned to their Region.

Options to Improve Human Capital Services

Indian Affairs is a very large organization requiring many personnel actions. During interviews and focus groups, employees expressed dissatisfaction with the customer service focus on the part of the Human Resources Specialists. Managers and supervisors cited delays in filling positions.



OPTIONS

Improve customer service response time by designating a Human Resources Staffing Specialist and a backup for all Bureaus/programs serviced

Publish the status of all hiring requests on the Indian Affairs intranet

Perform a needs assessment for all Human Resources (HR) Staffing Specialists and conduct targeted training to improve competency and address findings in the Human Capital Accountability Review Reports

Rename the OHCM Portland, OR Center for Conflict Resolution to the Office of Labor and Employee Relations under DAS-M OHCM.

Develop a strategic OHCM succession plan

Develop an Indian Affairs workforce plan

Establish transparent performance metrics tied to delivery of service and share with Indian Affairs leadership

Improve recruiting efforts by a creating a dynamic “Jobs” webpage

Model the structure of OHCM after the DOI Office of Human Capital to include: Human Resources, Equal Employment Opportunity, Occupational Health and Safety and Strategic Employee Development

Delegate the ability to initiate personnel security investigations, for Security levels 1-4, to the Human Resource Specialists in the BIA Regional Offices and the BIE.

Improve turnaround time from offer to on-board status. Establish a goal of obtaining clearances within six months of receipt of the applicant’s package. Revamp processes to assertively manage time lines and provide transparent reporting of relevant metrics to hiring managers.

Realign the DAS-M OHCM function so it is responsible for HR policies and procedures, personnel security, collective bargaining agreements, and employee learning and development



Maintain the Office of Human Capital Management (OHCM) as a centralized support service

Maximize use of automated Human Resource systems

Assign skilled Human Resources Staffing

Specialists who appreciate the unique needs of schools for each BIE Associate Deputy Director Office. Human Resources Specialists are managed by a Human Resources supervisor in the BIE Office of the Assistant Deputy Director Administration. The Human Resources Specialists should be in a ratio of 1 Specialist for every 100 employees.

Hire sufficient Human Resources

Staffing Specialists for each BIA Region. Number of staffing personnel is based on the number of employees in the Region, with a recommended ratio of one Specialist for every 100 employees. Regional Human Resources staff report to the Regional Director.

Recommendations

Hiring Process

The OHCM hiring process is not responsive to programmatic needs. Through interviews and the satisfaction survey, Indian Affairs employees revealed dissatisfaction with the customer service focus of the Human Resources Staffing Specialists - citing delays in filling positions and responding to inquiries.

Supervisors and managers want more human resources assistance with the documentation required to post a vacancy announcement, such as writing the position description, crediting plan, and vacancy announcement. While the trend in government has been to delegate technical and procedural classification tasks to managers



and supervisors, the managers are increasingly frustrated with the added burden to perform tasks for which they are not trained. The back and forth discussions of draft documents between the Hiring Manager and the Human Resources Specialist causes undue delays. The Managers would prefer that the Human Resources Specialist play a consultant role and interview the Hiring Manager for information about the skills and abilities sought in a new hire, and then provide the Hiring Manager with a draft hiring package for comment.

The 2010 Presidential Memorandum²¹ directs supervisors with responsibility for hiring to be fully involved in the hiring process. The ability to hire the right candidate swiftly requires a partnership between the Hiring Manager and the Human Resources Staffing Specialist. The Hiring Manager needs to actively engage with the Human Resources Specialist to identify the skills required for the job, propose creative additions to the vacancy announcement that “sell” the job and participate in the interview process, when applicable. The Human Resources Specialist must listen to the needs of the Hiring Manager and avoid cookie-cutter job descriptions, vacancy announcements and crediting plans. Most Indian Affairs Hiring Managers would benefit from more direct support from fully trained Human Resources Specialists. And, most Indian Affairs Human Resources Specialists would benefit from more direct involvement by Hiring Managers.



Even without realigning human capital functions, Indian Affairs will realize improved customer service, if OHCM institutes transparent, informative performance metrics for each hiring action. Hiring Managers are entitled to know the status of every step in the hiring process and an explanation of delays. Based on the results of the recent DOI Human Capital Accountability Review Reports, some Human Resources Specialists lack expert knowledge and skill in applying federal human resource statutes, regulations, and procedures. The current staff would benefit from a needs assessment, followed by targeted training. The Office of Personnel Management (OPM) offers a comprehensive

²¹ Improving the Federal Recruitment and Hiring Process: Memorandum for the Heads of Executive Departments and Agencies, 75 Fed. Reg. 27157 (May 14, 2010)



program, HR University (www.hru.gov), that provides assessments and refresher courses at minimal or no cost.

When compared to other peer agencies, Indian Affairs' recruitment efforts are lacking. Indian Affairs does not entice applicants to the organization through its website. The Indian Affairs' "Jobs" page on the internet and the vacancy announcements need to better market the many varied and appealing BIA and BIE jobs so that applicants are interested in working for Indian Affairs. For instance, the Indian Affairs internet "Jobs" page could include "a day in the life of" video, podcasts, current employee testimonials, and/or interviews with senior leadership. This "Jobs" page could be shared with career placement offices at Tribal Colleges and placed on the OHCM Facebook page and Twitter feed. These changes would require a minimal investment of IT development time and funding because Indian Affairs could leverage the work already performed by the Fish and Wildlife Service.

Realignment

While realigning OHCM is a disruptive and costly option, it may be critical for the future success of Indian Affairs. As the Indian Health Service, the National Park Service, and the Forest Service discovered, centralization of the Human Resources staffing function is not effective. Currently, however, OHCM does not have sufficient staff to decentralize.

Once Indian Affairs has budgetary authority to increase the number of Human Resource Specialists, each BIA Regional Office should be staffed with dedicated Human Resources Specialists. The number of Human Resources Specialists should be based on the size of the Regional Office, with a goal of one Human Resources Specialist for every 100 employees. The costs for the additional Human Resource Specialists are included in Appendix D. Field HR Specialists would be accountable to the Regional Director. This change in staffing will require the relocation of some staff from Reston, Albuquerque, and Anadarko to Regional Offices. Because this realignment is a significant modification for Indian Affairs, the realignment should not occur without a comprehensive change management plan.



For the BIE, Indian Affairs should establish a skilled BIE human resources team that is sufficiently staffed to meet the need for hiring new teachers. Currently, 19 HR Specialists support BIE from the OHCM Center for Recruitment in Albuquerque. To improve accountability, the BIE Human Resources Specialists should be organizationally realigned and report to the BIE Office of the Assistant Deputy Director Administration.

In a realigned organization, the DAS-M OHCM will have a strong leadership role in developing and updating policies, procedures, manuals, how-to guides, and oversight of the corrective action plans in response to the DOI Human Capital Accountability Review Reports. The peer agencies, reviewed by Bronner, with hybrid or decentralized human resources functions, still maintain the policies and procedures function in their Headquarters organization.

Personnel Security

Although the Indian Health Service (IHS) reports success with partial decentralization of the personnel security function, Indian Affairs should improve the performance of the current Personnel Security team before considering employing a decentralized HR delivery model. With assertive management of the process and the use of e-QIP, the time for personnel clearances should improve. If applicants are given clear deadlines and Hiring Managers assist with informing applicants of the consequences for failing to complete the security questionnaire, then Indian Affairs should see immediate improvements in the clearance process. Hiring Managers are entitled to regular reports from OHCM of relevant metrics on the status of an applicant's clearance.

Labor Relations

Finally, the OHCM Center for Dispute Resolution should be renamed the Office of Employee and Labor Relations, OHCM. This Office would provide policy and procedural guidance, and be responsible for the management of all grievances. However, managers and supervisors need close collaboration with Employee and Labor Relations Specialists to properly address employee performance and conduct issues. As budget resources become available, Indian Affairs should consider hiring 13 Employee Relations Specialists to serve



each of the BIA Regional Offices, and each of the BIE Offices of Administration. Appendix E outlines the costs for these positions.

IMPLEMENTATION PLAN

<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">1-6</p>	<ul style="list-style-type: none"> • Improve recruiting efforts by a creating a dynamic “Jobs” webpage • Create a proactive vision and plan for employee recruitment and retention • Perform a needs assessment for all Human Resources Staffing Specialists and conduct targeted training to improve competency and address findings in the Human Capital Accountability Review Reports • Institute a proactive customer service focus through team building exercises • Rename the Office of Human Capital Management (OHCM) Center for Conflict Resolution to the Office of Labor and Employee Relations • Publish the status of all hiring requests on the Indian Affairs intranet • Establish transparent performance metrics tied to delivery of service and share with Indian Affairs leadership
<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">7-12</p>	<ul style="list-style-type: none"> • Reassign 19 Human Resources Specialists from the OHCM Center for Recruitment in Albuquerque to the BIE Office of the Assistant Deputy Director Administration • Develop an OHCM succession plan • Develop an Indian Affairs workforce plan • Maximize the use of automated human resources systems • Develop a strategic plan to provide sufficient human resources specialists for each BIA Region



	<ul style="list-style-type: none"> • Pursue funding to support additional Human Resources Specialists
<p style="text-align: center;">YEARS</p> <p style="text-align: center;">2-3</p>	<ul style="list-style-type: none"> • Realign the DAS-M OHCM function so it is responsible for human capital policies and procedures, personnel security, collective bargaining agreements, and employee learning and development • Hire sufficient qualified Employee Development Specialists for the OHCM • Hire sufficient Human Resources Staffing Specialists for each BIA Region with a recommended ratio of one Specialist for every 100 employees. Regional human resources staff report to the Regional Director. • Delegate the ability to initiate personnel security investigations, for Security levels 1-4, to the Human Resource Specialists in the BIA Regional Offices and the BIE Office of the Assistant Deputy Director Administration.



Finding: Indian Affairs Does Not Have a Consistent, Comprehensive Employee Development Program

Current State

OHCM has the lead for employee development and training programs. In prior years, OHCM managed the Indian Affairs Leadership Development Program (IALDP) that focused on providing leadership development for selected GS-14 and GS-15 employees. The IALDP was a year-long program that could be considered one piece of a leadership succession plan; however, the IALDP was not funded in FY 2011. It is unclear whether the discontinuance of this program has been communicated to employees because the self-nomination application is still present on the Indian Affairs website.

The DOI has a contract to provide a leadership development program for GS 11/12/13 employees, and a development course for SES candidates. In FY 2010 and 2011, Indian Affairs employees did not participate in either of these programs. In FY 2011 Indian Affairs conducted a mandatory Management Symposium for all supervisors and managers. The course included lectures on administrative topics, but it did not provide leadership training.



Employee and Tribal Leader Feedback

SURVEY RESULTS:

I am aware of opportunities for professional development through the Headquarters Office of Human Capital Management	
Non-DAS-M Employee Survey Results	DAS-M Employee Survey Results
44.3% - strongly disagree/disagree	39.9% - strongly disagree/disagree
31.2% - neutral	27.6% - neutral
24.5% - strongly agree/agree	32.5% - strongly agree/agree

EMPLOYEE FEEDBACK:

“There is literally no time to provide training to employees on their individual responsibilities, programs responsibilities, accountability, and utilization of property.”

“I would have really benefitted from an orientation when I joined Indian Affairs.”

“Most employees in my group did not receive performance appraisals last year.”

“There is no transition and succession planning and we have an aging workforce.”

“Training is needed to keep employees’ skills current.”



“Supervisors need training and support from upper management to hold employees accountable.”

TRIBAL LEADERS FEEDBACK:

“New employees need a comprehensive orientation program that includes the differences among compact, 638 and direct service Tribes.”

“Employees need training on the importance of responsiveness and partnerships with Native communities.”

Peer Agencies

Employee development at the **Indian Health Service (IHS)** is jointly managed by Headquarters and Field staff. The Headquarters’ Officer for the Human Resources Office of Development is responsible for serving as the program manager for human resource development, organization development programs and initiatives. The officer also provides overall policy guidance on organization and human resource development, as well as designing, developing, and conducting training and capacity building programs for all IHS employees on an as needed basis. The Area Personnel Officers and Training Officials are responsible for assisting managers and supervisors to determine their organizational and training needs. The Area Personnel Officers and Training Officials also develop annual training plans, identify resources to meet the needs, and conduct or arrange for the appropriate training programs and activities.

While the IHS invests in its employees, when an employee participates in a training course or development program in excess of 80 hours in length, the employee must sign a Continue-in Service Agreement. In such cases, the employee agrees to remain employed with the IHS for the duration of three times the length of the training.



The **Fish and Wildlife Service** (F&WS) established the Branch of Conservation Leadership and Employee Development to identify, develop, and provide training, tools and services that enhance organizational leadership and employee and organization effectiveness in order to achieve the mission of the Fish and Wildlife Service. The National Conservation Training Center (NCTC) is located in Shepherdstown, West Virginia, and offers in-person and distance-learning training.

The F&WS has a well-organized new employee orientation. The Employee Foundations course (Foundations) is an integral part of the new employees' orientation. Along with a regional orientation and an office orientation, Foundations rounds out the new employee's introduction to the F&WS by providing an overview of the Service and its principles of consultation, communication, and collaboration in the effort of conservation. Foundations provide a basis in interpersonal skills critically needed to accomplish F&WS's mission. The Foundations course is 4.5 days at the NCTC campus. Foundations is mandated for all permanent employees within their first year with the F&WS. A unique prerequisite is F&WS's decision to require employees to complete an online orientation to the Congressional and federal budget processes.

The National Advocacy Center (NAC) is operated by the Department of Justice, **Executive Office for the United States Attorneys** (EOUSA). The facility is located in Columbia, South Carolina to train federal, state, and local prosecutors and litigators in advocacy skills and management of legal operations. More than 10,000 legal personnel are trained annually. Each Assistant United States Attorney develops a training plan with his/her supervisor that focuses on trial skills and substantive knowledge of federal law. The NAC also offers in-person courses for administrative support staff.

Recently, the **National Park Service** (NPS) made a significant investment in employee development. Five years ago, the NPS concluded that training and development services were broken. The DOI supported the initiative with a \$5 million separate line item for training and development. The NPS Headquarters' Office of Workforce Management developed two programs: new employee training, and all management and leadership training. The effort was led by the Chief of Learning and Development to ensure consistency across all



development programs. The Fiscal Year 2011 budget for the NPS Learning and Development Program was \$14.2 million.



New permanent employees are enrolled into the NPS Fundamentals program, a five-part program, within the first two years of employment. The program consists of five segments which include: three on-line modules and two residential programs. The program provides a sequential orientation to the NPS. The first segment is an on-line module which presents a history and overview of the NPS. This on-line module is followed by the first residential component, which is a two-week course at the Grand Canyon. This component is offered 24 times a year and the instructors are current or retired NPS employees. The participants are exposed to the mission, value, history, and programs of the NPS.

The third and fourth segments are on-line modules that review fundamental policies/procedures, benefits, and career planning. One year after the Grand Canyon program, the participants attend the fifth and final segment - a one-week capstone event in Washington, D.C. The attendees participate in leadership skills development and meet the NPS leadership. Even though the Fundamentals Program is very popular and successful, the NPS has the program under review for improvements.

The NPS Learning and Development staff also provides the Park Superintendents with a list of supplemental courses that are available to employees. These courses are paid through the Park's Operations and Management (O&M) base funding. In addition, the NPS offers seven Career Academies that aim to provide consistent early career technical training to new employees. The curriculum in each Career Academy is a result of collaboration between the Learning and Development staff and program office subject matter experts. The courses are offered online, in classrooms, and through the television.

To address leadership deficiencies, the NPS Learning and Development employees participated in the DOI Training Director's Council's effort to design a curriculum to address basic supervisory and leadership skills.



Partnering with the Fish and Wildlife Service and the Bureau of Land Management, the NPS will offer this course to employees beginning in FY 2012 to address the NPS leadership deficiencies.

The **Forest Service** supports employee training both in both external coursework and internal programs featuring state-of-the-art computer-based training. The Forest Service uses e-learning to meet the needs of a geographically dispersed workforce 24 hours a day. E-learning assists the employer and employees to meet many career development needs without incurring travel time or expense.

The Forest Service also offers formal professional certification programs such as timber management, bridge design, and land appraisal. Because of its unique mission, the Forest Service offers courses that are not available anywhere else in the world, such as the minerals and geology program which trains employees to be minerals examiners, or oil and gas administrators.

Options to Improve Indian Affairs' Employee Development Program

Currently, the orientation process for new employees is haphazard. Indian Affairs is losing an opportunity to engage new employees in the mission and history of the BIA and the BIE. Some Tribal Leaders expressed concerns that not all employees are aware of the difference among 638, compact and direct service Tribes.

Similarly, based on the results of the Best Places to Work rankings, effective leadership is a challenge for Indian Affairs. In 2010, Indian Affairs' score for effective leadership was 47 out of 100. In 2011, it decreased even further to 45.9. Also, Indian Affairs recorded low employee satisfaction scores for training and development opportunities. In 2010, the satisfaction score was 56.6 out of 100. In 2011, the employees' satisfaction with their opportunities for development trended further downwards to a score of 53.7.



OPTIONS

Sponsor employee participation in the FY 2012 supervisor skills/leadership course jointly provided by National Park Service, Fish and Wildlife Service, and Bureau of Land Management

Initiate a communication plan that markets DOI Learn courses to Indian Affairs employees and supervisors

Create a skills development plan for each employee during the yearly performance reviews

Develop and implement leadership skills training for all supervisors and managers

Request funding to reestablish the Indian Affairs Leadership Development Program for GS 13 and 14 employees

Revamp the employee orientation program to include a comprehensive overview of Indian Affairs' mission, history and functions, Tribal governments and their relationship to the U.S. government, and employee benefits

Establish an Employee Development Office within the Office of Human Capital Management (OHCM) and hire competent staff

Increase training resources available to employees

Conduct skills-gap analysis of all Indian Affairs employees to develop a strategic workforce plan

Recommendations

Agencies with best practices in the area of employee development invest resources, both funding and staff, in training its employees. It is imperative that Indian Affairs invest in the development of its employees. From the first day in the organization, an employee should be exposed to Indian Affairs' mission and the organization. A comprehensive orientation program could give new employees an overview of Tribal-federal government relations and the federal budget process. At a minimum, Indian Affairs could video record dynamic speakers on each orientation subject, and place the orientation video on DOI Learn. As funding





becomes available, Indian Affairs could follow the best practices of the peer agencies, and offer a new employee orientation that incorporates both on-line and in-person components.

Experienced and long-term employees also require training to ensure that their skills are current. In the short term, supervisors should engage in a meaningful dialogue with employees about areas for skills development and the available resources on DOI Learn during the yearly performance review. Moving forward, Indian Affairs should initiate a communication plan that markets DOI Learn

courses to Indian Affairs employees and supervisors.

An immediate option for Indian Affairs to address the gaps in leadership skills would be to sponsor employees to participate in the leadership course that is being launched jointly by the National Park Service, Fish and Wildlife Service and the Bureau of Land Management in FY 2012. Indian Affairs could implement a competitive process to ensure a fair and transparent selection process for the number of available opportunities. The estimated cost for the leadership training is \$570 per employee excluding additional expenses for travel. However, if Indian Affairs volunteers a conference venue, Indian Affairs employees could attend the training free of cost.

Similar to the peer agencies, the DAS-M OHCM should include an Employee Development Office that creates and coordinates training for all Indian Affairs employees. The Employee Development Office should coordinate substantive skills training with the applicable programmatic office (e.g., BIA Trust Services). Additionally, OHCM should lead the effort to upgrade and improve the leadership skills of Indian Affairs' supervisors and managers.

The DAS-M OHCM is best positioned to coordinate and facilitate training. However, the current OHCM staff is not qualified to manage a comprehensive quality employee development program. While recommending funding in times of budget constraints may be difficult, an investment in the employees and the future of



Indian Affairs should be seriously considered. The creation of this new office will require approximately six new staff members, and sufficient funding to support training programs. The costs for the additional Human Resource Specialists are included in Appendix F. As a point of comparison, the National Park Service began its training and development program with an infusion of \$5 million.

IMPLEMENTATION PLAN

<p>MONTHS 1-6</p>	<ul style="list-style-type: none"> • Sponsor employee participation in the FY 2012 supervisor skills/leadership course jointly provided by National Park Service, Fish and Wildlife Service, and Bureau of Land Management • Initiate a communication plan that markets DOI Learn courses to Indian Affairs employees and supervisors
<p>MONTHS 7-12</p>	<ul style="list-style-type: none"> • Create a skills development plan for each employee during the yearly performance review • Revamp the employee orientation program to include a comprehensive overview of Indian Affairs’ mission, history and functions, Tribal governments and their relationship to the U.S. government, and employee benefits • Develop and implement leadership skills training for all supervisors and managers
<p>YEAR 2</p>	<ul style="list-style-type: none"> • Establish an Employee Development Office within the Office of Human Capital Management and hire competent staff



Finding: The EEO Office is in Department of the Interior Receivership

Current State

At its inception, the Indian Affairs Equal Employment Opportunity (EEO) Office was located in Human Resources, but then it was moved to the BIA. The BIA EEO Office provided services to both BIA and BIE employees. Employees in DAS-M and the Office of the Assistant Secretary – Indian Affairs (AS-IA) received EEO services from the DOI Office of Civil Rights (OCR).

While under BIA’s management, the EEO Office was not able to carry out its statutory EEO responsibilities. The backlog of complaints and the inability to meet regulatory deadlines became so severe that, in June 2009, the DOI OCR took over day-to-day operation of the EEO program at the BIA.

The EEO functions for the BIA and BIE remain in “receivership,” or under the control of the OCR. Under the plan developed by the OCR, Indian Affairs will not be eligible to resume responsibility for the EEO Office until sufficient qualified EEO Specialists are hired, Indian Affairs has provided EEO training for all supervisors on employees’ rights and management’s responsibilities under anti-discrimination statutes, and leadership has demonstrated a commitment to provide quality and timely EEO service to the employees.

In the 2010 Best Places to Work category “Effective Leadership – Fairness,” Indian Affairs ranked 185 out of 224 agencies surveyed. This category measures the extent the employees believe arbitrary action and personal favoritism is tolerated, and if employees feel comfortable reporting illegal activity without fear of reprisal. Indian Affairs’ low ranking should be addressed through dynamic supervisory training because equal treatment in the workplace is an issue for Indian Affairs. In 2011, out of 228 subagencies, Indian Affairs ranked 225.



Employee and Tribal Leader Feedback

SURVEY RESULTS:

Program offices feel valued by support offices through the quality of services provided	
Non-DAS-M Employee Survey Results	DAS-M Employee Survey Results
29.9% - strongly disagree/disagree	26.4% - strongly disagree/disagree
36.9% - neutral	40.1% - neutral
33.2% - strongly agree/agree	33.4% - strongly agree/agree

Support and program offices strive to maintain good working relationships	
Non-DAS-M Employee Survey Results	DAS-M Employee Survey Results
24.9% - strongly disagree/disagree	27.4% - strongly disagree/disagree
40.9% - neutral	27.8% - neutral
34.1% - strongly agree/agree	44.8% - strongly agree/agree

EMPLOYEE FEEDBACK:

“It takes too long to deal with complaints.”

“More BIE employees are filing EEO complaints.”



Peer Agencies

Indian Affairs is unique among the peer agencies studied by Bronner. No other agency has lost control of its EEO function due to mismanagement.

There are various models for the placement of the EEO Office in an organization. The Diversity Management/Equal Employment Opportunity Office in the **Indian Health Service** (IHS) is responsible for ensuring that the rights of employees and applicants are protected, and that the agency promotes a proactive equal employment opportunity program to achieve IHS's goal of a diverse workplace. The Diversity Management/Equal Opportunity Office is a free-standing office that reports directly to the Deputy Director for Management Operations. Similar to Indian Affairs, the IHS applies the Indian Preference Act when hiring.

The **Fish and Wildlife Service** (F&WS) has an Office of Equal Opportunity and Diversity. This Office has a dynamic presence on the internet with FAQs for employees, along with links to policies, fact sheets, statistics, and complaint forms. The Office of Equal Opportunity and Diversity is part of the F&WS's Office of Human Capital. In the **National Park Service** the Associate Director for Workforce Management has management responsibility for the Equal Opportunity Office. The **Forest Service's** EEO program is managed by its Office of Civil Rights with EEO counselors in all of the Forest Service Regional Offices.

The Principal Deputy Director of **Executive Office for the United States Attorneys** (EOUSA) is responsible for the overall management of the EEO program within the United States Attorneys' Offices (USAOs) and the EOUSA, and is also responsible for allocating sufficient resources to meet EEO program objectives. The EEO Assistant Director, who is based in Washington, DC, is responsible for managing the EEO program and monitoring the complaints process to ensure the integrity of the program.

Options to Improve Indian Affairs' Ability to Manage the EEO Program

Indian Affairs has abdicated its sovereignty for the EEO program by permitting it to go into Departmental receivership. It is OCR's recommendation that Indian Affairs form an EEO Office with 16 qualified EEO staff,



and establish sufficient funding to conduct timely investigations. The OCR estimates that a fully operational EEO Office requires \$3 million in funding. The costs to staff the EEO Officer are included in Appendix G. To date, this funding has not been included in the Indian Affairs budget.

Under the “get well” plan developed by OCR, the BIA will not be eligible to resume responsibility for the EEO Office until the BIA hires sufficient qualified staff, provides EEO training for all supervisors on employees’ rights and management’s responsibilities under anti-discrimination statutes, and demonstrates a commitment to provide quality and timely service.

Currently, BIA is in year two of the plan, but has not hired sufficient employees who are able to effectively manage the volume of complaints. Nor, has the BIA or Indian Affairs trained supervisors and managers on employees’ rights and management’s responsibilities.

OPTIONS

Management responsibility for the EEO Office is moved from BIA to the Office of Human Capital Management (OHCM)

Promote COPE PLUS program
(alternative dispute resolution program)

BIA resumes responsibility of EEO Office after hiring sufficient skilled staff, providing mandatory EEO training for managers and supervisors, and developing a plan to provide timely and quality service

Add sufficient trained collateral duty EEO counselors at each BIA Regional Office and BIE Associate Deputy Director Office

Create an intranet EEO website which includes EEO reports and plans, rights and responsibilities applicable to the EEO process, information on allegations of discrimination and sexual harassment procedures, and a link to the DOI Office of Civil Rights webpage



Indian Affairs establishes the EEO Office as a direct report to the Deputy Assistant Secretary – Management

Indian Affairs establishes the EEO Office as a direct report to the Principal Deputy Assistant Secretary

Continue under OCR receivership beyond FY2012

Fund the EEO program so that Indian Affairs manages its anti-discrimination obligations responsibly

Develop and communicate an Indian Affairs EEO Strategic Plan to ensure a workplace that values the principles of equality, fairness, and diversity

Mandate comprehensive in-person interactive EEO training so supervisors and managers understand anti-discrimination laws and the dynamics when these principles are applied in the workplace

Recommendations

In the 2010 Best Places to Work category “Effective Leadership – Fairness,” Indian Affairs ranked 185 out of 224 agencies surveyed. This category measures the extent the employees believe arbitrary action and personal favoritism is tolerated, and if employees feel comfortable reporting illegal activity without fear of reprisal. Unfortunately, Indian Affairs ranking in this category fell further in 2011. Out of 228 subagencies, Indian Affairs ranked 225. Indian Affairs’ low ranking should be addressed through dynamic supervisory training because equal treatment in the workplace is an issue for Indian Affairs.

It is recommended that Indian Affairs take seriously its obligation to provide a workplace free of discrimination, and a culture where the leaders are viewed as fair. Until leadership reaffirms its overall commitment to prevent and eliminate discrimination in the workplace through education, training, and management accountability, Indian Affairs will continue to communicate to



its employees that it does not value providing equal employment opportunity, and a work environment where each employee is treated with fairness, dignity, and respect.

When the EEO Office was first established in Indian Affairs, it was part of the Office of Human Resources. Subsequently, it was moved to BIA, even though the EEO Office was responsible for providing EEO counseling and complaint investigation for both BIA and BIE employees. This model did not work well for Indian Affairs. The peer agencies studied by Bronner utilized various organizational models for their EEO program. None, however, placed the EEO Office in a program office. Because Indian Affairs needs a visible, functioning EEO program, Bronner recommends that Indian Affairs develop an EEO strategic plan so that the organization manages its own anti-discrimination obligations.



IMPLEMENTATION PLAN

<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">1-6</p>	<ul style="list-style-type: none"> • Develop and communicate an Indian Affairs EEO Strategic Plan to ensure a workplace that values the principles of equality, fairness, and diversity • Create an intranet EEO website which includes EEO reports and plans, rights and responsibilities applicable to the EEO process, information on allegations of discrimination and sexual harassment procedures, and a link to the DOI Office of Civil Rights webpage • Mandate comprehensive in-person interactive EEO training so supervisors and managers understand anti-discrimination laws and the dynamics when these principles are applied in the workplace • Promote COPE PLUS program (alternative dispute resolution program)
<p style="text-align: center;">MONTHS</p> <p style="text-align: center;">7-12</p>	<ul style="list-style-type: none"> • Fund the EEO program so that Indian Affairs manages its anti-discrimination obligations responsibly • Hire sufficient skilled EEO staff • Add sufficient trained collateral duty EEO counselors at each BIA Regional Office and BIE Associate Deputy Director Office • Develop and implement a plan to provide timely and quality EEO service



E. Safety

Finding: Indian Affairs Has Not Invested Sufficient Resources in the Safety Program

Current State

Safety and risk management policy and oversight is currently a responsibility of the Office of Facilities, Environmental and Cultural Resources (OFECR). The Division of Safety and Risk Management (DSRM) is located in Albuquerque, New Mexico. The BIA and BIE Safety and Risk Management program is staffed by BIA employees who are supervised by the BIA Regional Directors.

Funding and Staffing

The DSRM has seven allocated positions. Funding for the Regional safety positions are sub-allocated from the DSRM to the Regions based on the funds distribution for safety in Fiscal Year (FY) 2008 that were identified separately in the Safety Management budget line item. The funds are A-61 funds that are in the DSRM budget. The funding is insufficient to cover all the Regional needs; thus, to fund safety positions Regional Directors must choose to shift funding from other accounts. Because of competing priorities, some Regional Directors choose not to fund Safety Officer positions. Other Regional Directors advertised the position, but did not receive qualified applicants.

The following Regions have full-time professional Safety Officers: Great Plains Region, Southwest Region, Southern Plains Region, Northwest Region, and Eastern Region. The Navajo Region's Safety Officer retired in June 2011, but the position is expected to be filled. The Navajo Region is one of the largest Regions with five Agencies – each staffed with a Safety Officer funded through the Tribal Priority Allocation budget activity.



The Alaska and Pacific Regional Offices have employees for whom safety is a collateral duty. The Western Region, Midwest Region, and Rocky Mountain Region do not have Safety Officers.

The Eastern Oklahoma Region and the Eastern Region entered into a unique sharing arrangement for safety and risk management. The Regions negotiated a Memorandum of Agreement (MOA) which set forth responsibilities and priorities for safety and risk management functions. The Safety Manager is located in the Eastern Region, but is available on-call to the Eastern Oklahoma Region.

Responsibilities - DSRM

The DSRM is responsible for developing all safety policies for Indian Affairs and distributing the policies to the Regional Safety Officers. The DSRM reviews all plans for new construction, and then inspects the new facilities to ensure adherence with the Occupational Safety and Health Administration (OSHA) safety codes and the Americans with Disabilities Act (ADA) accessibility codes. Added duties include oversight and administration of the Workman’s Compensation program, which is discussed in the next section. The DSRM is also responsible for risk management at Headquarters/Central Office.

Each Regional Program is evaluated once every three years. Based on this cycle, the DSRM evaluates four Regions each year. The DSRM then provides a safety and risk management report to the Regional Directors to identify any deficiencies that need to be addressed.

Safety Officer Locations	
Regions With a Safety Officer	
-	Great Plains
-	Southwest Region
-	Southern Plains Region
-	Northwest Region
-	Eastern Region
-	Navajo Region
Regions With a Regional Collateral Duty Safety Officers	
-	Alaska Region
-	Pacific region
Regions Without a Safety Officer	
-	Western Region
-	Midwest Region
-	Rocky Mountain Region
-	Eastern Oklahoma Region
Regions That Share a Safety Officer	
-	Eastern Region
-	Eastern Oklahoma Region



In support of the Assistant Secretary's January 2010 Memorandum on Motor Vehicle Operation Policy Responsibilities, Implementation, and Procedures, the DSRM has developed an internal monthly scorecard to monitor Motor Vehicle Operation Policy compliance within Indian Affairs.

The DSRM has also developed another internal scorecard to monitor Regional Office compliance with OSHA, DOI, and Department of Labor (DOL) reporting requirements. The scorecard is used to track the submission of various reports including the Safety and Health Quarterly Reports, the Safety and Health Action Plan and Status Reports, as well as the annual OSHA Report.

The scorecards measure timeliness, not effectiveness. The scorecards reflect the timeliness of submissions to DSRM. Because DSRM has no line authority over the Regional Safety Managers, the internal scorecards are forwarded to the Directors of the BIA and BIE at the end of each reporting cycle for review. In FY 2011, report timeliness has improved, due in part to directives from the Director of BIA.

Responsibilities – Regional Safety Officers

The Regional Safety Officer is responsible for performing annual workplace inspections that are required by OSHA. Regional Safety Officers are responsible for BIA, BIE and Office of Justice Services work locations within their respective jurisdiction. While the training for Regional Safety Officers is provided at national meetings by the DSRM, the Regional Safety Officers are responsible for training the facility safety staff in their jurisdiction.



The Facility Management Information System (FMIS) is used to track the status of the safety program and generate progress reports. During the annual building/site inspections, the Safety Officers enter the findings into FMIS using a Risk Assessment Code (RAC). These reports inform the BIA Regional Directors and the BIE Education Line Officer of problem areas, and the progress in correcting the problems. If during the course of the year an OSHA violation occurs, the Safety Officer will do an additional inspection and file a report. The



Regional Safety Officer may also be a part of a serious accident investigation team such as a motor vehicle accident resulting in deaths.

Indian Affairs does not have a standard practice or policy to institute and sustain a safety committee in each facility. In other federal organizations with a strong safety focus, the safety committee reviews the safety plan for their facilities, encourages all employees to follow good safety and health practices, and assists the Safety Officer with maintaining written records of all committee meetings, safety training sessions, and related safety and occupational health activities.

Leadership

Based on Bronner's interviews, safety and risk management policies and procedures are documented; however, the efficacy of these policies and procedures is questionable. Focus groups with BIA and BIE managers reveal that there are few protocols for handling employee safety concerns, hazardous materials, or even safety protocols for construction projects. These concerns are not surprising considering that only six of the 12 BIA Regions have a Safety Officer. Significantly, there are no dedicated Safety Officers for the BIE.

Bronner received feedback from managers and supervisors that the regional safety evaluations should be customized for the type of work and hazards in that Region. For example, Regions with irrigation projects are concerned the DSRM does not have staff that are qualified to design a safety profile for irrigation projects or to conduct a job hazard analysis for irrigation operator positions. However, the BIA Division of Irrigation, Power and Safety of Dams, not DSRM, has responsibility for performing these safety inspections. The lack of clarity surrounding responsibility for safety is of concern and is a risk for Indian Affairs.



Employee and Tribal Leader Feedback

SURVEY RESULTS:

Are up-to-date information about Safety policies, procedures, and manuals readily available?	
Non-DAS-M Survey Results 25.5% DAS-M respondents indicated that such documents are not readily available	DAS-M Survey Results 30.6% DAS-M respondents indicated that such documents are not readily available

Satisfaction with clarity of communications regarding Safety policies:	The Safety Office clearly communicates policies and procedures to non-support offices:
Non-DAS-M Survey Results 23.5% - very unsatisfied/unsatisfied 31.9% - neutral 44.6% - very satisfied/satisfied	DAS-M Survey Results 29.5% - strongly disagree/disagree 32.6% - neutral 37.9% - strongly agree/agree



**Satisfaction with the prioritization
of Safety concerns by support
services staff**

Non-DAS-M Survey Results

24.3% - very unsatisfied/unsatisfied

35.0% - neutral

40.7% - very satisfied/satisfied

Satisfaction with the services received for Safety issues	The Safety Office's timeliness and quality of action taken to address questions and requests:
<p>Non-DAS-M Survey Results</p> <p>23.9% - very unsatisfied/unsatisfied</p> <p>34.2% - neutral</p> <p>41.9% - very satisfied/satisfied</p>	<p>DAS-M Survey Results</p> <p>18.8% - very poor/poor</p> <p>42.7% - fair</p> <p>38.5% - very good/good</p>

About 60% of **Non-DAS-M** respondents indicated that safety issues are addressed within zero to three days. 27% of respondents selected the “other” category. When asked to elaborate, answers ranged from not applicable to months to years to no response.



EMPLOYEE FEEDBACK:

“Our Region does not have a Safety Officer. What does that say about how valued we are by Indian Affairs?”

“All safety functions, including funding for safety personnel, training, testing, and safety abatement activities, should be delegated to the Regional Director.”

“The buildings where we work should meet all applicable safety codes, especially as regards to asbestos contamination.”

“Health and safety funding should be allocated to the Regions where the work activity is greatest and where there needs to be an effective, sustainable program.”

“We do not have sufficient funding to correct safety problems, so deficiencies often remain on the FMIS for years

TRIBAL LEADER FEEDBACK:

“Delegated authority should be at the lowest levels possible.”



Peer Agencies

The **Indian Health Service** (IHS), Office of Environmental Health and Engineering (OEHE) is responsible for employee safety and risk management. The Headquarters function is responsible for policy and training. Unlike Indian Affairs, the IHS has at least one Safety Officer in each Area Office, with larger Areas having more than one Safety Officer. The IHS Area Safety Officers work closely with the facilities in their jurisdiction. These local Safety Officers lead robust programs that provide a safe environment for workers, patients, and visitors. Achieving this mission requires knowledge and skills in the disciplines of occupational health and safety as well as infection control. In addition, each facility also has a safety committee. Because safety is a component of the health care facility accreditation process, the IHS is committed to employee safety at every facility.



The Assistant Director – Business Management and Operations – for the **Fish and Wildlife Service** (F&WS) is the F&WS's Designated Safety and Health Official, and ensures that the Division of Safety and Health regularly evaluates the Regional safety and health programs. The Chief, Division of Safety and Health, is responsible for the development, administration, and evaluation of the Service's safety and health program. The Chief also serves as the liaison with the Department of the Interior's Office of Occupational Health and Safety, and is responsible for policy development and dissemination.

The Regional Safety Managers are the primary advisors to Regional management and field station personnel on safety and health matters. The F&WS has eight Regions; with a Safety Manager in each Region, except Regions one and eight share a Safety Manager. The Managers evaluate how well Regional field stations are meeting Service-wide safety and health program requirements. The Managers perform this evaluation by reviewing information from sources such as: the Safety Management Information System accident/incident reports, tort claims, station-specific safety and health plans, annual inspection reports, and safety committee minutes.



The F&WS has standards for safety practices in each facility:

Elements of the Program	Needed if the duty station has...	Comments
Collateral Duty Safety Officer (CDSO)	4 or more employees	If the station has 3 or fewer employees, the CDSO at the next higher organizational level must take on the responsibility.
Safety Committee	9 or more employees	If the station has 8 or fewer employees and there is no Safety Committee, all employees must attend a safety meeting every 3 months.
Station Safety Plan	4 or more employees	Plan must cover the station's: <ul style="list-style-type: none"> • Physical layout • Activities • Environmental factors • Emergency procedures

The F&WS Division of Health and Safety has a comprehensive website that includes specific contact information, news, policies and hazard reporting guidelines and forms.²²

Risk management in the **Executive Office for the United States Attorneys** (EOUSA) is comprised of three distinct components: EOUSA, the U.S. Attorney's District Office Security Manager (DOSM), and the Domestic Terrorism Working Group of the Attorney General's Advisory Committee. The EOUSA provides policy and procedural assistance for the implementation of all security and occupational health programs. The DOSM, usually a Supervisory Assistant United States Attorney, manages all district security programs. The DOSM's responsibilities include implementing and locally overseeing the physical, information, personnel, computer,

²² <http://www.fws.gov/safety/index.htm>



and communications security programs, as well as the security education and awareness, loss prevention, and safety and health programs in accordance with current policy. The DOSM also develops the District Security and Occupant Emergency plans. The Domestic Terrorism Working Group, whose membership includes United States Attorneys and Assistant United States Attorneys, is part of the Attorney General's Advisory Committee. The Subcommittee coordinates security-related initiatives and educational efforts with EOUSA. In the EOUSA, physical and personnel security are emphasized more than occupational health and safety.

The safety program at the **National Park Service** (NPS) is the ultimate responsibility of the Director, who sets forth the NPS occupational safety and health policies and goals. The Associate Director, Visitor and Resource Protection, is the designated Safety and Health Official who oversees the Risk Management Division. This Division is responsible for developing programs, procedures, standards, and policies related to occupational safety, occupational health and industrial hygiene, public safety, and workers' compensation. The Risk Management Division staff provides general and technical guidance, consultation, and training for parks and regional offices in these functional areas.

The Regional Risk Manager is the occupational safety and health professional who serves as an advisor/consultant on occupational safety and health issues for the Regional Director, Operating Unit Managers, and safety personnel. The Regional Risk Manager evaluates the effectiveness of parks' occupational safety and health programs, within the Region, at least once every three years. The Regional Risk Manager also provide technical assistance for corrective actions identified in occupational safety and health audits, and develops safety promotion and/or awareness campaigns.

The NPS requires each park Superintendent to hire a professional full-time Safety Manager to oversee the safety program of a park or cluster of park units. For small parks, without a full-time safety professional, the Superintendent must appoint a Collateral Duty Safety Officer (CDSO) to serve as a point-of-contact for occupational safety and health issues. The CDSO consults with the full-time professional supporting that



unit in the administration of the safety and health program. For all safety-related issues, the full-time Safety Manager or CDSO reports directly to the Operating Unit Manager/Superintendent.

The objective of the **U.S. Forest Service** (Forest Service) safety and health program is to ensure adequate protection for Forest Service employees and property, human resource program participants, and the visiting public. The Deputy Chief for Business Operations is the designated agency Safety and Health Official, responsible for overall administration of the safety and health program, and chairs the Safety and Health Steering Committee. The Director of Human Resources Management is responsible for program development, including: reviewing proposed safety and occupational health policy, as well as reviewing and evaluating unit safety and occupational health programs. In addition, the Human Resources Director consults with Forest Service Managers on safety and occupational health matters.

The Washington, DC Safety and Occupational Health Program Manager (Safety Manager) provides the Forest Service managers with advice on safety and occupational health matters. The Safety Manager conducts onsite evaluations of unit programs, oversees injury, illness, and accident reporting and investigation, and also provides analysis of accidents to Forest Service leadership. In the field, the Regional Foresters, Station Directors, and Area Directors are required to appoint a qualified individual to manage unit safety and occupational health programs.



Options to Improve Indian Affairs' Safety Program

OPTIONS

Appoint collateral duty Safety Officers

in each BIA Region where a Safety Officer or a collateral duty Safety Officer does not exist

Develop a comprehensive Injury and Illness Prevention Program

Hire and retain full-time Safety Officers for BIA Regions that currently have either collateral duty Safety Officers or are without Safety Officers

For BIA Regions without a full-time Safety Officer, explore a sharing arrangement with a geographically close BIA Region or another federal agency

Retain the Division of Safety & Risk Management in the (OFECR), but change the focus to: developing programs, procedures, standards, and policies related to occupational safety and

Reinvigorate the safety program in

Indian Affairs by disseminating updated policies and procedures, creating risk management assessment templates, and providing training through webinars and podcasts

Hire and retain full-time Safety Officers for every BIA Regional Office and each of the three BIE Associate Deputy Director Offices

Develop policies so that BIA Regional Safety Officers are responsible for all employee safety oversight functions including those currently managed by other BIA programs

Fund the BIA safety programs directly, rather than as a pass through the Office of Facilities , Environmental and Cultural Resources (OFECR)

Employ a team of trained Regional

Safety Managers to conduct the Regional Program evaluations and new construction inspection

Enhance the Safety and Occupational Health training program

Establish and maintain a Safety

Committee in every Indian Affairs facility with more than nine employees

Appoint and train a Collateral Duty

Safety Officer in every Indian Affairs facility with four or more employees

Increase collaboration among the

Division of Safety & Risk Management, the Regional Safety Managers, and the BIA Division of Irrigation, Power and Safety of Dams



health; providing general and technical guidance, consultation, and training; and comprehensive reporting and trend analysis

Recommendations

Indian Affairs has not invested sufficient resources in its safety program. Compared with the peer agencies, Indian Affairs has only a skeleton of employees engaged in safety and risk management activities. It is incumbent upon Indian Affairs to ensure adequate protection for its employees as well as American Indian and Alaska Native community members who use BIA and BIE facilities.

Occupational health and safety is a critical employer responsibility. Because not all BIA Regions possess a Safety Officer, there is variation in how well safety and risks are addressed and mitigated across BIA and BIE. The lack of sufficient Safety Officers, access to safety policies and procedures, safety committees in every facility, and uniform training are risks for Indian Affairs.



In tight budget times, Indian Affairs must consider the short and long term risks of underfunding safety programs. While Bronner recommends that Indian Affairs invest in its employees and community by increasing the number of Safety Officers, Bronner realizes that this recommendation requires additional funding and a change in the funding structure. When Indian Affairs allocates its FY 2013 funding, Bronner recommends that Indian Affairs consider a new funding structure. The OFECR Division of Safety & Risk Management should receive sufficient funding to retain its current employees who will focus on: developing programs, procedures, standards, and policies related to occupational safety and health; providing general and technical guidance, consultation, and training; and providing comprehensive reports and trend analysis. The BIA Regions should receive sufficient funding to support a Safety Officer. The costs for the additional



Safety Officers are included in Appendix H. For the FY 2014 budget request, Bronner recommends that Indian Affairs request funding for three Safety Officers for BIE.

Alternatively, each BIA Region, without a full-time safety officer, could enter into a Memorandum of Understanding (MOU) with a geographically close DOI component or another federal agency to provide Safety Officer services. The MOU would have to provide specific Service Level Agreements (SLAs) to ensure that timely and adequate safety services are provided to the Region. While this is a band-aid solution, at least it would be an incremental step towards mitigating the current safety risks.

The OFECR Division of Safety & Risk Management must take the lead and reinvigorate the safety program in Indian Affairs by disseminating updated policies and procedures, creating risk management assessment templates, and providing training through webinars and podcasts. Currently, the quantity and quality of safety and risk management training is insufficient. Regional Safety Officers are trained at national meetings and they in-turn train the field Collateral Duty Safety Officers in their jurisdiction. Therefore safety training, when offered, is not uniform across all Regions.

Indian Affairs could improve training by utilizing the multiple safety courses at the DOI University or on DOI GoLearn. Additionally, the DOL sponsors OSHA Training Institutes which are located throughout the country. These Institutes are open to federal employees and offer courses, such as, a Collateral Duty Safety Course for Federal Agencies for \$650. In addition, OSHA has an outreach training program which identifies certified trainers within 300 miles of a zip code.

Similarly, the BIA Regional Safety Officers must reinvigorate their local programs. It is a best practice to have Collateral Duty Safety Officers in every facility with four or more employees. Similarly, every facility with nine or more employees should have an active Safety Committee charged with communicating and evaluating safety and health issues to create and maintain a safe and healthy workplace for all employees. This recommendation could be accomplished without an increase in funding.



When sufficient Regional Safety Officers are in place, and the OFECR Division of Safety and Risk Management has established itself as the safety coordinator, Indian Affairs will be in a position to launch a comprehensive Injury and Illness Prevention Program. Most successful Injury and Illness Prevention Programs are based on a common set of key elements: management leadership, worker participation, hazard identification, hazard prevention and control, education and training, and program evaluation and improvement. An element of this plan is improved collaboration among the Division of Safety & Risk Management, the Regional Safety Managers, and the BIA Division of Irrigation, Power and Safety of Dams.



IMPLEMENTATION PLAN

<p>MONTHS</p> <p>1-6</p>	<ul style="list-style-type: none"> • Reinvigorate the safety program in Indian Affairs by disseminating updated policies and procedures, creating risk management assessment templates, and providing training through webinars and podcasts • Enhance the Safety and Occupational Health training program through courses provided by DOI and DOL • Fund the BIA and BIE safety programs directly, rather than as a pass through OFECR • Develop a strategic plan for staffing the Indian Affairs' health and safety function
<p>MONTHS</p> <p>7-12</p>	<ul style="list-style-type: none"> • Establish and maintain a Safety Committee in every Indian Affairs facility with more than nine employees • Appoint and train a Collateral Duty Safety Officer in every Indian Affairs facility with four or more employees • Train Regional Safety Officers to conduct Regional Program evaluations and new construction inspections



YEAR
2

- Develop a comprehensive Injury and Illness Prevention Program
- Employ a team of trained Regional Safety Managers to conduct the Regional Program evaluations and new construction inspections



Finding: Workers' Compensation Claims Are Not Actively Managed

Current State

The Regional Safety Officers provide oversight over lost compensation, claims against the government (work and employee claims), and assist employees who are filing claims for on-the-job injuries with the Department of Labor, Office of Workers' Compensation Programs (OWCP) pursuant to the Federal Employees Compensation Act (FECA). Regional Safety Officers are responsible for BIA, BIE and Office of Justice Services OWCP activity within their respective jurisdiction.

The DSRM has overall responsibility for managing OWCP claims and assisting Headquarters/Central employees with on-the-job inquiries. The DSRM internal scorecard tracks the OWCP Chargeback Reports, but is not responsible for decreasing Indian Affairs' OWCP payments.

There is little to no communication between the Human Resources Specialists in the Office of Human Capital Management and the Regional Safety Officers concerning employees who have submitted OWCP claims or are receiving OWCP benefits. No one is actively tracking whether employees, who receive OWCP benefits, have recovered from their injuries and can return to work. The lack of a comprehensive oversight program for Indian Affairs workers' compensation claims and benefits is a potential risk of waste, fraud, abuse, or mismanagement.

In FY 2009, the most recent year for DOL statistics²³, Indian Affairs' case rate²⁴ was 5.2. The lowest case rate for DOI was in the Office of Surface Mining and Enforcement (0.96). The highest case rate, 8.44, was in the National Park Service. The Fish and Wildlife Service's case rate was 5.85. Similarly, Indian Affairs lost time

²³ http://www.osha.gov/dep/fap/statistics/fedprgms_stats09_final.html

²⁴ Case rate is the rate of injury/illness per 100 employees.



rate²⁵ was 2.61, the second highest in DOI after the National Park Service at 3.53. The Fish and Wildlife Service's lost time rate was 1.28.

Currently, workers' compensation claims are poorly managed and monitored. Employee claims are initiated by the Regional Safety Officers, who are overwhelmed. The staff in DSRM accumulates data for reports, but do not assertively manage the chargeback report. There is little to no communication among the Human Resources Specialists in the Office of Human Capital Management (OCHM), the Regional Safety Officers, and DSRM concerning employees who have submitted workers' compensation claims or are receiving workers' compensation benefits. The lack of a comprehensive oversight program for Indian Affairs' workers' compensation claims and benefits is a potential risk for waste, fraud, abuse or mismanagement.

Employee and Tribal Leader Feedback

EMPLOYEE FEEDBACK:

“It is not possible to conduct safety audits and manage the employees' workers' compensation claims.”

“Indian Affairs does not have a good handle on the employees who receive workers' compensation and whether they can come back to work.”

²⁵ Lost time rate is calculated as a nonfatal traumatic injury that causes loss of time from work beyond the day or shift it occurred; or a nonfatal non-traumatic illness/disease that causes disability any time.



TRIBAL LEADER FEEDBACK:

“The safety of our tribal members who work for BIA or BIE must be ensured.”

Peer Agencies

Workers’ compensation cases at the **Indian Health Service (IHS)** are managed locally by the Servicing Personnel Office (SPO). The IHS Headquarters is responsible for establishing plans for full accountability for the management of the injury compensation program within IHS. Each Area Director is responsible for requesting investigations if waste, fraud, or abuse is suspected. Each SPO is responsible for monitoring and controlling all administration aspects of FECA provisions as they relate to employees of the SPO's servicing area. The case rate for IHS in FY 2009 was 3.61, and the lost time rate was 1.81. Both rates are lower than the rates for Indian Affairs.



The Assistant Director - Business Management and Operations of the **Fish and Wildlife Service (F&WS or Service)** is ultimately responsible for employees’ safety and management of the workers’ compensation program. In FY 2011, the Assistant Director took the proactive step of charging the F&WS Office of Safety and Health (OSH) with evaluating the Workers’ Compensation program challenges that resulted in the Service absorbing more than \$6 million annually for the cost of employee injuries. The OSH worked to refine management strategies and policies to improve employee safety and reduce costs. In addition, OSH worked to complete safety management reviews to ensure the Regional program effectiveness was in line with best business practices in both the private and public sectors.



In the Department of Justice (DOJ), the Deputy Assistant Attorney General, Human Resources Administration, is designated as the senior leadership employee responsible for OWCP activities in the DOJ. The Director of the **Executive Office for the United States Attorneys** (EOUSA) is responsible for implementing the Workers' Compensation Program (WCP) for the offices it supports. In EOUSA, there is a Safety Official to meet management's responsibilities of the WCP. This safety official produces an annual report detailing progress in managing and reducing the costs of the WCP, including continuation of pay, and a forecast of future achievable objectives in this area for the bureau.

In 2009, the DOJ Office of Inspector General (OIG) found that the DOJ components, other than the FBI and the Bureau of Prisons, did not have effective measures in place to prevent waste, fraud and abuse in its program to provide compensation to its employees with work-related injuries or illnesses.²⁶ The OIG found that the components were “reactive, rather than proactive” in supervision of the FECA cases. The EOUSA, along with other DOJ components, reviewed only supervised cases that were new and involved staff that seemed likely to come back to work. The OIG recommended that DOJ review older cases because “medical conditions may improve over time and employees may reach a point where they could return to work.” The DOJ, including the EOUSA, agreed to implement these recommendations.

Faced with the highest accident and fatality rates within DOI, the **National Park Service** (NPS) instituted the Operational Leadership Program. This program empowers employees to be assertive about their safety and safety of their team, and encourages them to participate in the decision making and risk management process. The NPS emphasizes that safety must be integrated as a leadership practice and become part of the culture, and not an isolated program or initiative. A goal of the Operational Leadership is to assist the NPS workforce achieve a higher level of professional excellence by creating and fostering a culture of safety that seeks out and values input from employees who are the best equipped to make risk management decisions

²⁶ Department of Justice, Office of the Inspector General: *The Department of Justice's Management of the Federal Employees' Compensation Act Program*, Audit Report 09-34 (August 2009).



within the organization. The NPS has instituted operational leadership concepts in its Regions as a tool to reduce human error, a significant cause of accidents.

The NPS emphasis on safety appears to be working. For the first three quarters of FY 2011, NPS's total case rate was 5.48, with a projected year-end case rate of 7.31.²⁷ This is an improvement from FY 2009 when the total case rate was 8.44. Similarly, the projected lost time case rate for FY 2011 is 2.77, a decrease from 3.53 in FY 2009.

The **U.S. Forest Service** (Forest Service) utilizes a centralized approach to deliver support services. In 2008, the Forest Service consolidated its workers' compensation program to its Albuquerque Human Capital Management Service Center. The Human Capital Management/Workers' Compensation (WC) Section is the initial point of contact for processing and managing all work related injury/illness claims by Forest Service employees. The WC Section also works with managers to return injured employees back to work.

On August 25, 2011, the Government Accountability Office (GAO) issued a report entitled *Forest Service Business Services: Further Actions Needed to Re-examine Centralization Approach and to Better Document Associated Costs* (GAO-11-769). The GAO found the centralization of human resources functions at the Forest Service caused widespread employee frustration. To alleviate some of the frustration, the Forest Service redesigned its human resources management program. Under the redesign, the Forest Service assigned teams of nine to 64 human resources staff to each Region dependent on the size of the Region. However, the Forest Service did not decentralize the work of the WC section.

²⁷ http://www.osha.gov/dep/fap/statistics/fedprgms_stats11_3rd.html



Options to Improve Indian Affairs' Workers Compensation Program

OPTIONS

Contract out Indian Affairs' workers' compensation program to DOI's National Business Center, Employee and Public Services

Move the workers' compensation program into Office of Human Capital Management with responsibility for managing new claims and monitoring approved claims

Train Regional Safety Officers to proactively manage Indian Affairs' workers' compensation program

Complete periodic case reviews on every FECA claim

Ensure that periodic medical updates are obtained and evaluated for reemployment opportunities for all Indian Affairs employees on the chargeback report and pursue second medical opinions when necessary

Recommendations

Indian Affairs has options to improve its management of the workers' compensation program. If Indian Affairs is committed to investing in its safety program and undertakes the recommendations in the previous section, then it could improve the case and lost time rate in each Region. As part of the Health and Safety Strategic Plan, Bronner recommends proactive management of FECA claims.

If Indian Affairs is not in a position to fund a Safety Officer in every BIA Region, then leadership should consider contracting with DOI's National Business Center, Employee and Public Services, or another shared service provider, for comprehensive FECA case oversight. This option would at least mitigate the risk of



fraud, waste, and abuse due to poor monitoring of employees currently collecting workers' compensation benefits.

The most disruptive option is to move the workers' compensation program to the OHCM. As seen by Bronner's review of other federal agencies, often the management of the workers' compensation program is performed by the Human Capital Office. Because the OHCM is not currently in a position to manage staffing and employee development, in addition to FECA cases, transferring responsibility for the worker's compensation program is not a viable option for Indian Affairs at this time.

Whichever option Indian Affairs implements, it must proactively manage and oversee the workers' compensation program. This includes completing periodic case reviews on every FECA claim. In addition, leadership should ensure that periodic medical updates are obtained and evaluated for reemployment opportunities for all Indian Affairs employees on the chargeback report, and pursue second medical opinions when necessary.



IMPLEMENTATION PLAN

<p>MONTHS</p> <p>1-6</p>	<ul style="list-style-type: none"> • Complete case reviews on every Federal Employment Compensation Act (FECA) claim • Ensure that periodic medical updates are obtained and evaluated for reemployment opportunities for all Indian Affairs employees on the chargeback report and pursue second medical opinions when necessary • Develop a Strategic Plan, with consideration of Indian Affairs' unique geographic challenges, for a shared service provider to oversee Indian Affairs Worker's Compensation Program
<p>MONTHS</p> <p>7-12</p>	<ul style="list-style-type: none"> • Implement the Shared Services Strategic Plan for management of Indian Affairs' Worker's Compensation Program



F. Internal Controls

Internal Control, Evaluation and Assessment Require High Priority Status within Indian Affairs

Current State

In December 2004, the Office of Management and Budget (OMB) announced a significant policy change and directed federal agencies to strengthen management's assessment of internal control over financial reporting, and to integrate and coordinate internal control assessments.²⁸ According to the OMB, internal controls include program, operational, and administrative areas as well as accounting and financial management.

In 2005, Indian Affairs responded to OMB's directive and established the Office of Internal Evaluation and Assessment (OIEA) to improve internal controls of the administrative operations and programs.²⁹ The OIEA has nine employees who are responsible for ensuring Indian Affairs is in compliance with multiple federal regulations.

The OIEA has five major functions which encompass oversight of the entire Indian Affairs organization.

OMB Circular A-133: Single Audits

The OIEA is responsible for oversight of Indian Affairs' grantee compliance with the OMB Circular No. A-133, Implementing the Single Audit Act (Single Audit). This Circular sets forth standards for obtaining consistency

²⁸ OMB Circular A-123: *Management's Responsibility for Internal Controls*, dated December 21, 2004.

²⁹ While the official organization chart for Indian Affairs includes an Office of Audit and Evaluation as part of the Office of the Chief Financial Officer (OCFO), this office no longer exists.



and uniformity among federal agencies for the audit of state and local governments, as well as non-profit organizations expending federal awards.

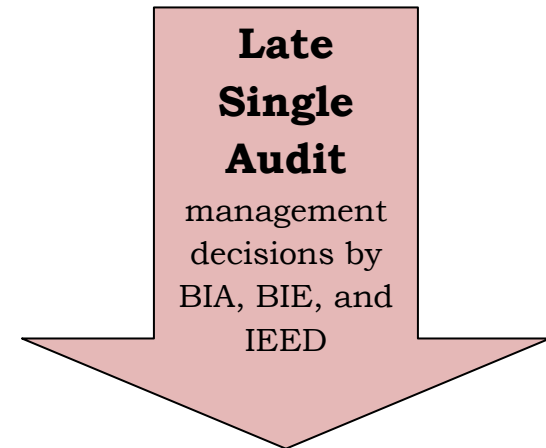
Non-federal entities, including American Indian and Alaska Native entities, which expend \$500,000 or more in a year in federal awards, are required to have a single or program-specific audit conducted by a Certified Public Accountant within nine months after the end of the fiscal year. The Single Audit report is provided to the OIEA and the DOI Inspector General (IG).

The OIEA reviews the Single Audit report and sends a memorandum to the BIA awarding officer or the BIE grant officer describing the audit findings. The OMB requires federal awarding agencies to issue a management decision on audit findings within six months after receipt of the single audit report. The management decision must state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action.

While the OIEA provides advice and guidance, it is significant to note that responsibility for writing the management decisions rests with the awarding entity: BIA, BIE and the Office of Indian Energy & Economic Development (IEED). If BIA, BIE, and IEED do not issue a management decision within 365 days, Indian Affairs is time barred from collecting any costs ultimately determined to be disallowed.

OMB Circular A-123: Internal Controls

The OIEA is the lead Indian Affairs office to ensure compliance with OMB Circular No. A-123 (A-123). In collaboration with BIA, BIE, and all DAS-M offices, the OIEA develops the Fiscal Year Internal Control Review



Indian Affairs was time barred from collecting over **\$10M** in potentially disallowed questioned costs in FY2010.



Priorities Plan. Pursuant to A-123, agencies and individual federal managers must take systematic and proactive measures to (i) develop and implement appropriate, cost-effective management controls for results-oriented management; (ii) assess the adequacy of management controls in Federal programs and operations; (iii) identify needed improvements; (iv) implement corresponding corrective action; and (v) report annually on management controls.

Indian Affairs uses a risk assessment tool to determine the type of internal control review that will take place each fiscal year. Employees in OIEA provide training to program staff, through both in-person and Web-ex trainings. The OIEA also assists program staff to identify key controls, tests, and corrective action plans. The OIEA is responsible for submitting the Indian Affairs A-123 results to the Department.

OMB Circular A-123 Appendix A

OMB Circular A-123 Appendix A prescribes additional requirements for internal controls. In FY 2006, the OMB provided updated internal control standards and new specific requirements for conducting management's assessment of the effectiveness of internal controls over financial reporting. The OIEA provides independent support to the OCFO for the assessment of ten business processes essential for sound financial management. The OIEA assists with the development of the assurance statement and functions as the independent reviewer.

Indian Affairs, as the second highest funded component in the Department of the Interior, must have adequate financial and programmatic controls to prevent waste, fraud, abuse, and mismanagement.

OMB Circular A-50 Compliance

When the Government Accountability Office (GAO) or the Office of the Inspector General (OIG) issues audit reports to Indian Affairs, OIEA is responsible for tracking the management response. At the conclusion of a programmatic audit, the GAO or OIG issues recommendations for corrective action. Indian Affairs officials are required to submit a written response which either agrees or disagrees with the reported finding(s) and

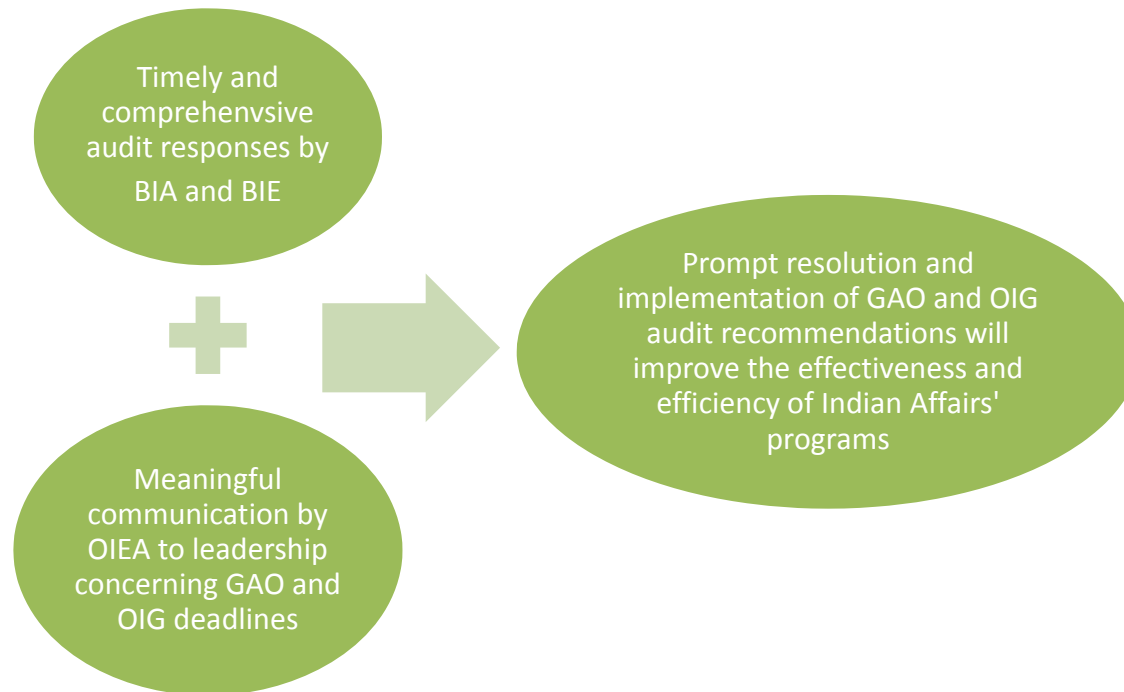


recommendation(s). If Indian Affairs agrees with the recommendation(s), then it must include planned corrective actions and dates for achieving the changes. If Indian Affairs disagrees with the recommendation(s), then it must explain the reasons for the disagreement. Where disagreement is based on interpretation of law, regulation, or the authority of officials to take or not to take action, the response must include the legal basis.

When OIEA receives a GAO or OIG audit report, the OIEA provides the report to the responsible program official with a target date for a response. The OIEA provides weekly reports to the Office of the Assistant Secretary – Indian Affairs, BIA, and BIE concerning outstanding audit responses. These reports, however, have not been effective in alerting Indian Affairs leadership of delayed responses.



➔ In FY 2010, Indian Affairs did not take sufficient action to complete the agreed to actions to resolve IG and GAO recommendations, thus Indian Affairs only closed 74 percent of the recommendations referred. This resulted in Indian Affairs missing the Department closure goal of 85 percent.



In addition to program audits, the OIG investigates colorable complaints of potential criminal activity by Indian Affairs employees or a recipient of Indian Affairs funding. If the OIG declines to investigate a complaint, it may refer it to the responsible DOI component for management action. The OIG will inform Indian Affairs whether or not the referral requires a response.



Prior to FY 2011, the OIEA was responsible for managing referrals from the OIG Office of Investigation. Now, the referrals are managed by the Director of the Office of Human Capital Management (OHCM). The OHCM has cleared the backlog and referrals that required a response. Responses for management referrals are signed by a management official in the Office of the Assistant Secretary – Indian Affairs.

Program Assessments

The OIEA conducts in-depth assessments for programs that have suspected or known deficiencies. In the past, the OIEA conducted programmatic assessments of trust payments. This function is now managed by the Office of Special Trustee for American Indians. Currently, OIEA is focused on BIA specific program assessments, such as forestry sales and weapons inventory. At the conclusion of the assessment, OIEA provides the Director of BIA with a report, including recommendations for corrective action. Indian Affairs does not require the Director of BIA to provide OIEA with a corrective action plan, therefore, OIEA does not know if the documented issues have been resolved.

Federal Climate of Oversight and Accountability

Indian Affairs has struggled to embrace the new federal climate of oversight and accountability for programmatic efficiency. While Indian Affairs is commended for its comprehensive A-123 internal control program, the management of BIA, BIE, and IEED struggle to comply with federal requirements to issue timely management decisions pursuant to A-133 (Single Audit) and to respond timely to GAO and OIG audits and investigatory referrals.

In her March 1, 2011, testimony, Acting Inspector General Mary L. Kendall testified before the House Committee on Appropriations, Subcommittee on Interior and Related Agencies that “responsibility to American Indians has consistently been a top management challenge for the Department.” Moreover, she testified that “[t]he myriad problems we [the OIG] have uncovered portray programs that are sorely understaffed, underfunded, and poorly managed. The OIG has indentified gross program inefficiencies at many levels of Indian Affairs and in [T]ribal management of Federal funds.”



Recently, Indian Affairs has expressed a commitment to achieve improvements in how it manages responses to Single Audit Act audits as well as OIG and GAO investigations and audits. The options presented provide Indian Affairs with a choice of paths towards attaining change.

Employee and Tribal Feedback

SURVEY RESULTS:

Support and program offices hold each other accountable for measureable and high quality service	
DAS-M Survey Results 34.4% - strongly disagree/disagree 30.1% - neutral 35.5% - strongly agree/agree	Non-DAS-M Survey Results 30.1% - strongly disagree/disagree 42.9% - neutral 27.0% - strongly agree/agree

EMPLOYEE FEEDBACK:

“There is better accountability in the Regions due to checks and balances with Headquarters.”

“In the past, sometimes employees were pushed to execute contracts that were improper by the Regional Directors.”

“The support staffs need performance standards and managers who will hold them accountable.”



“Correcting audit/IG findings is not a priority for program managers.”

TRIBAL LEADER FEEDBACK:

“Tribes that correct their Single Audit financial deficiencies should be valued by Indian Affairs.”

Peer Agencies

The governance structure established by the **Indian Health Service (IHS)** for management control includes a Senior Management Council, a Senior Assessment Team, and a Circular A-123 Technical Team. Collectively, these teams conduct and oversee the IHS assessment process, coordinate the completion of the OMB A-123 management responsibility for internal controls annual assurance statements, and ensure that all A-123 requirements are met.

The Director of Management Policy and Internal Control (MPICS) has primary responsibility for coordinating all IHS management control functions. This includes developing, maintaining, and providing Agency-wide guidance policies or procedures for Federal Managers’ Financial Integrity Act (FMFIA) processes and related matters; developing and maintaining the IHS Management Control Plan; assessing and analyzing management control reviews; clearing survey tools, questionnaires and test evaluation instruments; ensuring proper documentation of findings; preparing reports; monitoring and ensuring the follow-up of corrective actions; and providing expert advice, technical assistance, and training as requested.

On a local level, IHS Area Directors are responsible for managing and coordinating all FMFIA activities within their respective organizations. The FMFIA activities include responsibility for planning, developing, establishing, budgeting, implementing, and maintaining cost-effective systems of management controls.



The **Fish and Wildlife Service** (F&WS) Assistant Director for Business Management and Operations has overall responsibility for internal controls. The Division of Financial Management conducts the A-123 internal control review to ensure program effectiveness and has responsibility for Appendix A compliance. For Single Audit Act resolution, the F&WS delegates responsibility for audit resolution to the Regional Directors.

However, the Chief, Branch of Audits, Division of Administration and Information Management in Washington, monitors the resolutions of all Single Audit Act audits. Assisting the Chief of Audits is the F&WS Audit Liaison Officer, who tracks the audit recommendations until the F&WS completes the corrective actions and provides status reports to F&WS leadership.

For GAO and OIG audits, the F&WS Regional Directors and Assistant Directors are responsible for preparation of responses to draft and final audit reports and for taking appropriate actions on audit recommendations. The Audit Liaison Officer provides advice to program officials regarding the F&WS's response to OIG and GAO audit reports.

The Comptroller of the **National Park Service** (NPS) is the Chief Financial Officer for the NPS and has Service-wide responsibility for financial and program reviews conducted by the GAO and IG, and is also responsible for audit liaison and management accountability. These functions include methods for tracking and measuring performance accountability, such as management control reviews, GAO and IG audit support, and GAO and IG reporting requirements. This is a staff function that provides liaison and coordination related to the management control review process and NPS responses, and necessary follow up to audit reports done by the GAO and the IG.

For many years, the **Executive Office for the United States Attorneys** (EOUSA) has monitored the activities of U.S. Attorneys' Offices (USAOs) through a formal evaluation process overseen by its Evaluation and Review Staff (EARS) Office, which conducts independent peer evaluations of individual district offices. The EARS Office attempts to perform an evaluation of each USAO every three years.



From an administrative perspective, these reviews focus on compliance with statutes, regulations, and EOUSA policies and procedures. These reviews are an important tool in discovering potential waste, fraud, abuse, and mismanagement. The EARS staff coordinates one-week performance evaluations of each USAO. These evaluations are conducted by a team of experienced Assistant United States Attorneys, who focus on legal issues. The review team also includes administrative and financial litigation personnel from EOUSA, or experienced administrative staff from other USAOs. The EARS Office is the point of contact for USAOs for matters relating to management controls.

Recently, due to emphasis on the importance of internal evaluation and controls, EOUSA moved the EARS function to the Office of Planning, Evaluation and Performance. This Office reports directly to the Principal Deputy to the EOUSA Director. The structure and composition of EARS is currently under review to determine the appropriate number of staff, qualifications, and type of reviews for maximum effectiveness.



Options to Improve Management’s Responsibility for Internal Control

OPTIONS

Retain the Office of Internal Evaluation and Assessment (OIEA) as a direct report to the Deputy Assistant Secretary – Management

Maintain staffing levels for the OIEA

Indian Affairs Chief of Staff holds BIA, BIE, and Office of Indian Energy and Economic Development (IEED) senior leadership accountable for issuing timely management decision letters on Single Audit Act reports and responses to GAO and OIG audit recommendations

Realign OIEA under the Office of the CFO

The Assistant Secretary issues a National Policy Memorandum concerning management accountability

Revise OIEA reports to Indian Affairs leadership to highlight achievable milestones, responsible management officials and delays

Implement meaningful performance metrics to measure response times on Single Audit Act reports and closure rates of GAO and OIG audit recommendations

Revise and update the Indian Affairs Manual, Part 5 “Management Accountability”

Increase staff in OIEA to boost the number of internal assessments that OIEA conducts each fiscal year to ensure Indian Affairs has adequate oversight to prevent waste, fraud, abuse, and mismanagement



Recommendations

Organization

There are a variety of organizational models to manage the OMB's requirements to ensure programmatic and administrative efficiency and effectiveness. According to the GAO³⁰, the Generally Accepted Government Auditing Standards (GAGAS) emphasize the importance of the independence of the audit organization and its individual auditors; the exercise of professional judgment in the performance of work and the preparation of related reports; the competence of the audit staff; and audit quality control and assurance.

The GAO emphasizes that government audit organizations must be independent. When a government organization is separate from the entities that it reviews, it avoids being affected by potential influences that compromise professional judgment, and allows the employees to act with integrity, exercise objectivity and professional skepticism. It is also critical that the organization's internal audit/evaluation function maintain an appearance of independence. Auditors and audit organizations maintain independence so that their opinions, findings, conclusions, judgments, and recommendations will be viewed as impartial by objective third parties with knowledge of the relevant information.

A few managers in Indian Affairs expressed the opinion that the internal audit, evaluation and assessment function should be placed in the Office of the Chief Financial Officer (OCFO). Bronner does not support this option. A major function of the OIEA, pursuant to OMB Circular A-123 Appendix A, is to provide independent support to the OCFO for the assessment of ten business processes essential for sound financial management. The OIEA assists with the development of the assurance statement and functions as the independent reviewer.

Placing the internal audit function under the purview of the OCFO, or any other Indian Affairs program, would be viewed as a threat to the independence of Indian Affairs internal auditors. Under GAGAS, internal

³⁰ Comptroller of the United States, *Government Auditing Standards*, GAO-10-853G (August 2010)



auditors who work under the direction of the audited entity's management are considered independent if the head of the audit organization meets all of the following criteria:

- is accountable to the head or deputy head of the government entity or to those charged with governance
- reports the audit results both to the head or deputy head of the government entity and to those charged with governance
- is located organizationally outside the staff or line-management function of the unit under audit
- has access to those charged with governance; and
- is sufficiently removed from political pressures to conduct audits and report findings, opinions, and conclusions objectively without fear of political reprisal.

The current placement of the OIEA as a direct report to the DAS-M satisfies the requirement that the internal auditors are located organizationally outside of the staff or line-management functions of the offices they review pursuant to A-123 and A-123 Appendix A. The OIEA Director is accountable to the DAS-M, who is charged with governance for Indian Affairs. The OIEA also submits its reports to the Assistant Secretary – Indian Affairs (Assistant Secretary) and the DOI Office of Financial Management. An improvement to the current structure would be to institute quarterly briefings of the Assistant Secretary by the Director of OIEA to ensure that OIEA has access to leadership and to reinforce the absence of political pressure.

The OIEA must also demonstrate its ability to provide Indian Affairs leadership with actionable information. The current reporting system is not effective in providing prioritized data so that executives can easily manage the required responses.



Commitment

To set a new tone of commitment for management responsibilities to ensure operational and programmatic efficiency and effectiveness, Bronner recommends that the Assistant Secretary issue a National Policy Memorandum concerning management accountability. This memorandum should emphasize that internal controls – organization, policies, and procedures – are tools to help program and financial managers achieve results and safeguard the integrity of their programs. To be successful, internal controls must be integrated into efforts to improve effectiveness and accountability – an integral part of the entire cycle of planning, budgeting, management, accountability, and auditing.

When the OIG or GAO report program deficiencies, it is an opportunity for Indian Affairs to correct inadequacies. It is the responsibility of the program managers and Indian Affairs leadership to ensure that the OIG and GAO audit recommendations are addressed timely. Similarly, it is Indian Affairs' obligation to be responsible stewards of federal funds. When Single Audit Act audits report disallowed or questioned costs, Indian Affairs program managers must timely address the findings and institute appropriate corrective actions. As part of the National Policy Memorandum, the Assistant Secretary should announce that the Chief of Staff will personally hold BIA, BIE, and Office of Indian Energy and Economic Development (IEED) senior leadership accountable for issuing timely management decision letters on single audit reports and responses to GAO and OIG audit recommendations.

Following the National Policy Memorandum, Bronner recommends that a team composed of staff from the Office of the Assistant Secretary, OIEA, BIA, BIE and IEED revise and update Part 5, Management Accountability, of the Indian Affairs Manual. Part 5 is not current – one chapter has not been updated in 14 years.

Staffing

Each year, OMB implements additional requirements to federal agencies to ensure programmatic and administrative efficiency and effectiveness. A potential challenge for Indian Affairs is whether or not it has



sufficient OIEA staffing to comply with these requirements. Moreover, to ensure a vigorous internal audit and assessment function, the office must have sufficient staff. In an organization as large as Indian Affairs, a nine-person office, without any contract support, limits the number of assessments that OIEA is able to conduct.

However, with the current federal budget climate and competing priorities, Bronner does not recommend increasing the OIEA staff. On the other hand, the importance of the staff’s role in ensuring an adequate internal control and assessment program necessitates that the current staffing level is sustained.

IMPLEMENTATION PLAN

<p>MONTHS</p> <p>1-6</p>	<ul style="list-style-type: none"> • Maintain staffing levels for the Office of Internal Evaluation and Assessment (OIEA) • The Assistant Secretary issues a National Policy Memorandum concerning management accountability announcing that the Indian Affairs Chief of Staff will hold BIA, BIE, and Office of Indian Energy and Economic Development (IEED) senior leadership accountable for issuing timely management decision letters on single audit reports and responses to GAO and OIG audit recommendations • Implement meaningful performance metrics to assess response times on Single Audit Act reports and closure rates of GAO and OIG audit recommendations • Revise OIEA reports to Indian Affairs leadership to highlight achievable milestones, responsible management officials and delays • Revise and update the Indian Affairs Manual, Part 5 “Management Accountability”
<p>MONTHS</p> <p>7-12</p>	<ul style="list-style-type: none"> • Develop a peer review process to evaluate local management controls of accounting, budget, acquisition, property and human resources processes



G. Homeland Security and Emergency Services

Finding: The Office of Homeland Security & Emergency Services is Misplaced in DAS-M

Current State

The Office of Homeland Security & Emergency Services (OHSES) originally reported to the Deputy Commissioner of Indian Affairs (what is now the Director of BIA). Later, the reporting relationship for OHSES was moved to the Deputy Assistant Secretary for Management (DAS-M).

Currently, this office executes centralized functions through two people in Washington, D.C. and one person in Portland, Oregon. An employee in each of the 12 BIA Regional Offices completes delegated tasks related to homeland security and emergency services as a collateral duty, with an additional twelve employees assigned as alternates in case of an emergency. All Regional personnel report to their BIA Regional Directors rather than to the central OHSES.

The functions of the OHSES are to both organize the response to natural and man-made disasters, and to implement emergency response programs. With just three employees, OHSES must work through and with other DOI bureaus and federal agencies. Many Tribes now have their own emergency management programs, which are then augmented by OHSES. The necessity for specialized assistance and a lack of funds requires collaboration with other federal agencies; thus, OHSES often acts as a liaison among the federal departments, non-profit organizations, and volunteers. These liaison duties are centralized in the Tribal Assistance Emergency Management Group. A Tribe may report an issue, and this informal group helps to pair the request with an available agency. Due to its close connection to both federal agencies and Tribes, the OHSES often acts as a liaison for Tribes, regardless if the matter pertains to emergency situations.

The Department of the Interior carries out its emergency management responsibilities and supports the National Response Plan (NRP) through the immediate office of the Secretary and the eight constituent bureaus



and agencies, including Indian Affairs' OHSES. The Office of Law Enforcement, Security and Emergency Management is responsible for overall coordination of the DOI's emergency management responsibilities and NRP support.

The OHSES communicates through daily bulletins, bi-weekly border incident reports, and any updates deemed relevant to the Tribes from other divisions, especially the BIA Office of Justice Services. The OHSES is less successful in briefing DOI senior leadership concerning emergency issues and natural disasters in American Indian and Alaska Native communities. The OHSES does not provide daily or weekly briefing materials on emergency conditions or natural disasters to the Office of the Secretary or the Deputy Secretary.

Employee and Tribal Leader Feedback

EMPLOYEE FEEDBACK:

“Its value is diminished by being in a separate organization from BIA Justice Services.”

TRIBAL LEADERS FEEDBACK:

“All law enforcement activities should be coordinated.”



Peer Agencies

The **Indian Health Service** (IHS) Office of Emergency Services provides the overall direction and leadership for establishing IHS goals and managing objectives consistent with those utilized by the Department of Health and Human Services, Department of Homeland Security and other federal agencies to address mission critical elements of emergency management and services.

The Office of Emergency Services promotes, advocates, and coordinates support for American Indian and Alaska Natives emergency services programs, along with concerns at the local, state, and national level. There are Emergency Preparedness Coordinators at each Area Office. Emergency preparedness duties at the Service Unit Level are handled on an ad hoc basis by the Chief Executive Officer, who usually assigns the task as a collateral duty to one of the staff members. In contrast, Indian Affairs does not have a strong emergency preparedness presence.

The **National Park Service** (NPS) promotes and regulates the use of national parks, monuments and non-Tribal reservations. The primary goals of the NPS are to safeguard human life, the resources from permanent or lasting damage, and public and personal property. As the primary law enforcement and emergency operations entity in national parks, park rangers are regularly involved in all aspects of emergency operations including: law enforcement, search and rescue, emergency medical services, wildland and structural fire, and responding to natural disasters. Of the 12,000 NPS employees, approximately 1,550 are commissioned rangers and special agents. Unlike Indian Affairs, the NPS's emergency program is co-located with its law enforcement services.

For more than 100 years, the **U.S. Forest Service** (Forest Service) has managed forest fires. The Forest Service partners with the DOI through the National Interagency Fire Center (NIFC) in Boise, Idaho. The BIA is a member agency of the NIFC. The major focus of the NIFC is wildland fire suppression.



Options to Improve Homeland Security and Emergency Services

OPTIONS

Increase collaboration between the Office of Homeland Security & Emergency Services (OHSES) and BIA Justice Services

Include information that can assist Tribes with emergency management on the Indian Affairs internet site

Realign the OHSES to BIA Justice Services

Retain OHSES in the Deputy Assistant Secretary – Management organization

OHSES to provide weekly updates to DOI leadership on emergencies and natural disasters on American Indian and Alaska Native lands

Realign the OHSES to BIA with a direct report to the BIA Director

Recommendations

To better align with the DOI Office of Law Enforcement, Security and Emergency Management, Bronner recommends that the OHSES be realigned under the BIA Office of Justice Services. While there is no financial cost to realign the OHSES, the change may involve Tribal Consultation and Congressional notification.



At a minimum, OHSES should include information that can assist Tribes with emergency management on the Indian Affairs internet site. In addition, OHSES should be more proactive in providing DOI leadership with information and status updates concerning emergency situations and natural disasters.

IMPLEMENTATION PLAN

<p>MONTHS 1-6</p>	<ul style="list-style-type: none"> • Include information that can assist Tribes with emergency management on the Indian Affairs internet site • Be more proactive in providing DOI leadership with information and status updates concerning emergency situations and natural disasters • Realign OHSES under the BIA Office of Justice Services
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H. Information Technology

Current State of DOI IT Transformation

On December 2010, DOI Secretary Ken Salazar, through Secretarial Order 3309, mandated a Department-wide information technology (IT) consolidation for more standardized functions across all bureaus, and ordered that all DOI IT efforts be lead by a single Chief Information Officer (CIO). The IT Transformation strategic plan identifies an initial set of high priority IT services as part of the transformation process, including: a single email system for the Department, telecommunications, account management, hosting services, workplace computing services, risk management, and an enterprise service desk (help desk). The outcome of the multi-year IT Transformation will be a new model for managing and delivering IT that will:

1. Shift the focus of large-scale IT planning from the acquisition of physical hardware and software to the delivery of customer-oriented services whose value will be measured by their impact on the mission.
2. Establish a new purchasing model for IT by which bureaus will buy services instead of infrastructure. For each service area, the price will represent the total cost of ownership, expected level of performance, and a schedule for delivery that will match program timelines.
3. Meet or exceed customer expectations for reliability, accessibility, and availability to the information resources needed to achieve our missions.

Associate Directors for Information Resources (ADIR) will assume the former role of the CIO within each Agency/Bureau and directly report and coordinate with the DOI-OCIO. In line with this organizational streamlining, the Indian Affairs' Office of the Chief Information Officer (OCIO) has renamed itself to the Indian Affairs Information Technology (IAIT), and this change has been reflected on the Indian Affairs website. The IAIT's current organization and strategic direction has been moving forward within the context of DOI's more rigorous enterprise approach (model) while managing its mission-specific technology applications and assets.



Finding: Significant Improvements in Help Desk and Technical Support Services Are Needed – with a Focus on Quicker Response Resolution Rates

Current State

Through interviews and surveys conducted by Bronner, Indian Affairs employees emphasized an urgent need to improve IT help desk and technical support services. A recent IT help desk aging report revealed a relatively high number of outstanding work tickets beyond 30 days. Various factors contribute to this poor assessment, for instance, lack of technical staff, time to process work orders, aging systems, and lack of user knowledge. Response resolution rates must improve immediately to sustain employee productivity, minimize call-backs, and decrease the issuance of new help tickets.



Operationally, technicians lack the necessary customer data, systems, and processes to efficiently and effectively diagnose and resolve customer IT issues. Technicians can rely on a service center to generate history and related information from work tickets; however, the information is not adequate to enable IAIT to proactively perform issue analysis and incident tracking processes. Additionally, the IT help desk has not been able to effectively employ performance metrics to measure customer satisfaction and capture feedback. Currently, the IT help desk has a very limited system of capturing and addressing customer feedback, and does not provide users access to work order status information.

Moreover, the IAIT does not employ common cost and workload reduction strategies, such as providing employees with a Frequently Ask Questions (FAQ) page which enables employees to self-remedy minor and common technical issues. Nor are employees engaged to share best practices or make recommendations to alleviate technical issues. In general, an active and enabled user community helps in reducing the current workload on help desk operations and decrease support costs.



Currently, DOI is deploying new PCs and the Windows 7 operating system to all Indian Affairs employees. In conjunction with the deployment of new equipment, users are provided with training and technical support. Upgraded technology is considered an effective method to address some persistent IT issues.

Employee and Tribal Leader Feedback

SURVEY RESULTS:

Up-to-date information about IT policies, procedures, and manuals are readily available in either hard copy or online:	
Non-DAS-M Employee Survey Results 22% of Non-DAS-M employees indicated such documents are not made available	DAS-M Employee Survey Results 15.3% of DAS-M employees indicated such documents are not made available

Customers are aware of the IT point of contact	
Non-DAS-M Employee Survey Results 88.7% - Yes 11.3% - No	DAS-M Employee Survey Results 61.5% - strongly agree/agree 17.4% - neutral 21.2% - strongly disagree/disagree



IAIT’s timeliness and quality of action taken to address questions and requests	
Non-DAS-M Employee Survey Results 23.2% - very poor/poor 27.1% - fair 49.7% - very good/good	DAS-M Employee Survey Results 21.2% - very poor/poor 27.8% - fair 51.0% - very good/good

EMPLOYEE FEEDBACK:

“It takes too long to get computers.”

“It takes too long to get issues resolved. My wireless connection problems have not been fixed in five months.”

“Computer issues can remain for two weeks without any help.”

“Took four months to hook up my printer.”

“Help tickets go to the Central Office, rather than my Regional Office.”

“Heat ticket process is too long.”

“We need better remote access so we can telework.”

TRIBAL LEADERS FEEDBACK:

“We need to use technology, such as teleconferencing and video teleconferencing, to improve communication.”



Peer Agencies

Unlike Indian Affairs' centralized delivery of IT support, the **Indian Health Services** (IHS) operates a decentralized IT delivery service model. The IHS Office of Information Technology uses secure IT to improve health care quality, enhance access to specialty care, reduce medical errors, and modernize administrative functions consistent with the Department of Health and Human Services enterprise initiatives. The Office of Information Technology (OIT) is primarily responsible for two key activities:

- Development, implementation, and support of health IT-related applications
- Design, implementation, and support of the IHS network and all related IT activities



Principal OIT customers include Tribal and IHS hospitals and clinics, Area IT offices, and IHS Headquarters staff. IT is essential to effective quality health care delivery and efficient resource management in the IHS. Health care is information-intensive and increasingly dependent on technology to ensure that appropriate information is available whenever and wherever needed.

IT offices are in each Area Office and larger Service Units. Smaller Service Units receive their support from respective Area Offices. The Headquarters has a small team in Rockville, Maryland, that concentrates on advocacy, budget formulation, and policy development. There is a larger team in Albuquerque, New Mexico, managed by Headquarters that is responsible for software development, data collection from the Area Offices, and analysis of the data.

Area Office IT staff maintain the Area IT network and load new programs and newer versions of existing programs on the Area and Service Unit servers. They also provide user support at the Area level for both



hardware and software issues. Larger Service Units may have IT support personnel, while the smaller Service Units receive support from the Area Office IT on hardware and software issues.

On the other hand, the **Executive Office of the United States Attorneys** (EOUSA) centralized its IT services. The EOUSA analyzes, designs, and provides automated services and systems in support of the litigation mission. In addition, EOUSA IT services provides selected administrative functions of the U.S. Attorney's Offices (USAOs) including development, implementation, and monitoring of policies and programs for office automation, systems development activities, and data base maintenance. Moreover, the centralized IT service arranges for the acquisition and installation of integrated office automation systems in the USAOs, and provides technical support to users of automated systems in USAOs to manage and support the acquisition and maintenance of office automation equipment.

The **U.S. Forest Service** (Forest Service) consolidated and standardized agency financial systems and procedures, which helped to alleviate some of its long-standing problems with financial accountability, and helped sustain unqualified financial statement audit opinions more easily. When the Forest Service centralized, it relocated some IT positions to the Albuquerque Service Center, but many employees remained in field-unit locations and became "virtually centralized" employees reporting to centralized management in Albuquerque. Although centralization gave the Forest Service more consistent policy development and implementation, and ensured all employees used compatible hardware and software, the Government Accountability Office (GAO) found that centralization of business services had widespread, largely negative effects on field-unit employees³¹.



Under centralization, the Forest Service relies on a self-service approach whereby employees are generally responsible for independently initiating or carrying out many related business service tasks. The forms are

³¹ *Forest Service Business Services: Further Actions Needed to Re-examine Centralization Approach and to Better Document Associated Costs* (GAO-11-769)



automated; if employees have questions, they are referred to a help desk. According to field-unit employees, the increased administrative responsibilities, coupled with problems operating the automated systems and a lack of customer support, negatively affected employees' abilities to carry out their mission work and led to widespread employee frustration.

The DOI IT Transformation directly impacts and dictates the current and future state of IT operations within the following peer agencies: the **Fish and Wildlife Service** (F&WS), and the **National Park Service** (NPS). According to the DOI IT Transformation strategic plan, DOI will focus on creating an Enterprise Service Desk (Help Desk). This service area may include the following:



- A single toll-free number that employees may use as a starting point for assistance
- Acceptance of service requests via voice, web chat, web forms, and email
- Routing of trouble tickets to the right technical support resources

An enterprise-wide service desk will connect DOI employees with technical experts who can provide the assistance whenever and wherever it is needed.



Options to Improve Indian Affairs' Help Desk Services

OPTIONS

Ensure complete user training and support related to on-going deployment of new Personal Computers (PCs) and the Windows 7 operating environment

Establish and measure performance metrics around customer satisfaction and feedback

Enable Indian Affairs employees to access IT help through the use of instant messaging and video conferencing (in addition to email and telephone)

Establish a transparent method for users to track service requests and resolution

Develop, maintain, and engage an active user community to promote better utilization of existing and new technologies and maximize Indian Affairs business benefits

Implement more proactive analysis and incident tracking processes to gain feedback and insights on call levels, incident type, locations from which large numbers of incidents arise, and individuals who require more than the normal level of assistance

Consolidate DOI resources for enterprise help desk operations where applicable and feasible, while ensuring local responsiveness

Increase (or re-allocate) positions for help desk operations

Improve help desk performance with a more sophisticated technology infrastructure and business processes.

Establish a Frequently Asked Questions (FAQ) page within the new intranet site to allow employees to self-service common and minor IT issues



Recommendations

Given the Department's IT Transformation Initiative, it does not make strategic sense to engage in anything that is duplicative of the Initiative's current efforts. However, operational efficiencies may still be gained during the implementation of the DOI IT Transformation.

With regards to equipment, the IAIT should ensure complete user training and support related to on-going deployment of new Personal Computers (PCs) and the Windows 7 operating environment. It is mission critical to equip the Indian Affairs workforce with the skills to properly use new hardware and software. The lack of proper training often leaves employees frustrated, and work hours are spent troubleshooting issues rather than on mission critical tasks. Ensuring the needed training and support at the beginning of the implementation process also prevents avoidable complications later on.



Operationally, the IAIT help desk should establish a transparent method for users to track service requests and resolution; establish and measure performance metrics around customer satisfaction and feedback; and implement more proactive analysis and incident tracking processes to gain feedback and insights on call levels, incident type, locations from which large numbers of incidents arise, and individuals who require more than the normal level of assistance. Efficiencies would be easily gained if documentation of service was available. Further analysis of the data collected would help IAIT identify problem areas to address. Ultimately, establishing and measuring performance allows the help desk team to be more efficient and effective.

Given the capabilities of the new Indian Affairs Intranet, the IAIT should provide a feedback section for Indian Affairs employees to leave their comments on the services rendered. Moreover, IAIT should establish a Frequently Asked Questions (FAQs) page within the new Intranet site to allow employees to self-service



common and minor technical issues. The FAQ page would decrease the number of tickets requested. Thus, allowing the help desk team to concentrate on more serious IT issues.

IMPLEMENTATION PLAN

<p>MONTHS 1-6</p>	<ul style="list-style-type: none"> • Ensure complete user training and support related to on-going deployment of new Personal Computers (PCs) and the Windows 7 operating environment • Establish a transparent method for users to track service requests and resolution • Develop and measure performance metrics around customer satisfaction and feedback • Create a Frequently Asked Questions (FAQs) page to allow employees to self-service common and minor technical issues on the new Intranet site
<p>MONTHS 7-12</p>	<ul style="list-style-type: none"> • Implement more proactive analysis and incident tracking processes to gain feedback and insights on call levels, incident type, locations from which large numbers of incidents arise, and individuals who require more than the normal level of assistance • Continue to ensure complete user training and support related to on-going deployment of new Personal Computers (PCs) and the Windows 7 operating environment • Create a feedback section for Indian Affairs employees to leave their comments on the services rendered on the new intranet site



Finding: BIE Technology Infrastructure and Level of Technical Support Services Is Considered Inadequate

Current State

The IAIT organization supports the increasing IT demands of all Indian Affairs employees. Indian Affairs is a complicated federal agency, because it has its own school system that is managed by the BIE. To understand the scale of IAIT's responsibilities, IAIT provides services to approximately 5,400 computers to the BIA and 12,000 computers to the BIE. Services rendered to BIE includes IT support for the 59 BIE-operated schools.

Despite IAIT's ongoing IT support and modernization efforts, BIE staff continues to express concerns of inadequate support levels – especially compared to the perceived level of support provided to BIA. Many BIE managers believe that they do not receive the proportionate level of support from IAIT. Moreover, the IAIT support team possess little to no knowledge of education-related needs, challenges, and opportunities. To better serve BIE schools, BIE employees also expressed a need for deploying an alternative educational product suite (hardware and software) to schools. This may be an expensive acquisition, but will likely be more cost-efficient in maintenance.

Moreover, BIE and BIA employees are on two different email domains. The BIE employees are part of the (.edu) domain – which is intended for postsecondary U.S. institutions that are institutionally accredited. While BIA and the rest of Indian Affairs employees are part of the (.gov) domain – which is intended for government entities in the U.S. Separating the BIE out from the rest of Indian Affairs has caused much communication challenges – which attributes to BIE employees feeling forgotten by the rest of Indian Affairs.



Employee and Tribal Leader Feedback**SURVEY RESULTS:****Satisfaction with the IT equipment available to perform your job****Non-DAS-M Employee Survey Results**

81.9% - satisfied

18.1% - unsatisfied

Satisfaction with the clarity of communications regarding IT equipment policies and procedures**Non-DAS-M Employee Survey Results**

18.5 – very unsatisfied/unsatisfied

32.4% - neutral

49.1% - very satisfied/satisfied



EMPLOYEE FEEDBACK:

“BIE is not valued as a customer.”

“The IT staff is not trained in education-related IT challenges and opportunities.”

“We need the Apple product suite to maximize our students’ exposure to education software.”

Peer Agencies

It is fairly uncommon for a school system to be managed through a federal agency. Of the peer agencies observed in this study, none of the peer agencies manage a school system. The Department of Defense (DoD) also operates a school system and BIE leadership has consulted with the DoD Education Activity to discuss best practices.

Many of the BIE service issues may be addressed through the implementation of the DOI IT Transformation Initiative – especially along the lines of IT support. Moreover, based on interviews conducted by Bronner, the DOI OCIO indicated that it is considering making alternative educational products available Department-wide as an alternative option to Personal Computers (PCs).



Options to Improve BIE's IT Infrastructure and Support Levels

OPTIONS

Engage with DOI OCIO by quickly providing cost benefit analysis and deployment plan of alternative educational hardware/ software across all BIE schools

Strengthen Indian Affairs Information Technology (IAIT) Customer Relationship Management (CRM) function and strategy to specialize in BIE and education-related technical and business requirements

Engage in regular high-level management communication processes for sustained and collaborative identification and resolution of issues and challenges between IAIT and BIE

Work with DOI OCIO to ensure roll- out of education-specific hardware and software for use in BIE schools

Engage DOI OCIO to move BIE to the same domain platform (.gov) as the rest of Indian Affairs

Implement a targeted training strategy and business process improvement project to maximize utilization of current and new technologies

Factor additional BIE support into the IT workforce position allocation

Recommendations

Given the DOI IT Transformation, most of the challenges faced by BIE will be addressed once implementation is in full effect. For instance, under the IT Transformation strategic plan, DOI will consolidate all DOI employees into one email system. Currently, there are 14 email systems deployed DOI-wide, and not all



systems have the needed support. The IAIT should engage DOI OCIO to ensure that BIE is brought onto the (.gov) domain, and not left under the (.edu) domain.

Because the DOI OCIO is considering making alternative educational IT products available as an option under the Transformation Initiative, IAIT should actively engage DOI OCIO to ensure these products are adopted by the Department. The IAIT should advocate for BIE by providing the DOI OCIO with a cost benefit analysis and deployment plan of educational hardware/ software across all BIE schools, and ensure roll-out of the hardware/software to all BIE schools. During the roll-out and implementation process, the IAIT should play an active role in ensuring that all schools are receiving the new equipment, and that the necessary training and support is provided upon installation.

IMPLEMENTATION PLAN

MONTHS 1-6	<ul style="list-style-type: none"> Engage DOI OCIO to ensure that BIE is brought onto the (.gov) domain, and not left under the (.edu) domain during the IT Transformation implementation Advocate for BIE by providing DOI OCIO with a cost benefit analysis and deployment plan of alternative educational hardware/ software across all BIE schools
MONTHS 7-12	<ul style="list-style-type: none"> Ensure roll-out of the new hardware/software to all BIE schools Play an active role in ensuring that all schools are receiving the new equipment Ensure that the necessary training and support is provided upon installation



I. Communications

Finding: Internal Communications Concerning Support Office Policies & Decisions are Fractured

Current State

Indian Affairs currently faces many challenges with communications surrounding support office policies and decisions. Field employees expressed frustration that they do not know why decisions are made. Current communications are reported to lack context and explanations. In general, there is little coordination of internal communications regarding policies and decisions. If policies and procedures are distributed, it is communicated through email or telephone. Because hard copies of policies and procedures are no longer widely distributed, the Indian Affairs intranet is considered the primary source of communication for such information. Yet, support office intranet pages are rarely updated. Moreover, the Indian Affairs intranet is not highly utilized by employees. Employees are directed to the site when starting their computers, but most employees quickly close out of the intranet window, as it is reported that relevant content is hard to find.



During this assessment, the IAIT intranet development team launched a new and improved intranet site that is capable of providing: flow charts for operational processes, a library of standard government forms, podcasts, video clips, flash pages with rotating news, how-to-guides, “IA Improve” (a suggestion vehicle), “Ask IA” (a question and answer feature), and “IA Connect” (a social collaboration tool). Indian Affairs leadership



has an opportunity to market the site and the site’s capabilities. Each support office should post current policies and procedures on each office’s intranet page.

Currently, the Indian Affairs Office of Public Affairs has not designated a staff member with the responsibility of ensuring organizational-wide dissemination of information. The internal communications infrastructure, however, is in the process of being upgraded to equip every Indian Affairs facility with teleconferencing capabilities. It is vital for all Indian Affairs employees to be able to receive information from Indian Affairs leadership in multiple formats.

Employee and Tribal Leader Feedback

SURVEY RESULTS:

Headquarters support service offices coordinate well with Regional employees:	
DAS-M Employee Survey Results 32.1% - strongly disagree/disagree 34.1% - neutral 33.8% - strongly agree/agree	Non-DAS-M Survey Results 26.0% - strongly disagree/disagree 50.2% - neutral 23.8% - strongly agree/agree

Support offices provide updates on changes in administrative policies in a timely manner:	
DAS-M Employee Survey Results 37.8% - strongly disagree/disagree 28.4% - neutral 33.8% - strongly agree/agree	Non-DAS-M Survey Results 32.7% - strongly disagree/disagree 36.0% - neutral 31.3% - strongly agree/agree



Headquarters support office managers encourage open discussion before major operational decisions are made:

DAS-M Employee Survey Results

45.8% - strongly disagree/disagree

28.4% - neutral

25.8% - strongly agree/agree

EMPLOYEE FEEDBACK:

“Personal relationships make the system work.”

“The reorganization was done before the policies were written so there is little guidance about how to do your job correctly.”

“There is not much communication from the top down to the Field.”

“Communication is strained. The time difference alone causes stress.”

“I hear about policy changes haphazardly.”

“Policy changes seem ad hoc and accomplished by email and not a signed policy.”

“Poor communications about HR policies”



TRIBAL LEADERS FEEDBACK:

“Information is stove-piped.”

“There is a disconnect in communication among Tribes, Regions, and Headquarters.”

“Indian Affairs needs to put its policies and procedures in writing and then communicate them internally to their staff and externally to the Tribes.”

“Because Indian Affairs does not communicate policies to the Field, we receive inconsistent guidance/direction.”

“Stop sending faxes to the Tribes. Send scanned documents via email.”

“The current structure does not promote coordination, communication or accountability.”

Peer Agencies

Excellent communication is the hallmark of the **Fish and Wildlife Service** (F&WS). Internal communications at the F&WS is spearheaded by the Chief of Public Affairs within the Division of Communications. In addition to internal communications, the Chief also oversees operations, editorial review, administrative and policy, as well as multimedia and web coordination.

Moreover, a culture of communications is cultivated within the F&WS. The Deputy Director of Operations and the Assistant Regional Directors are in constant communication. When there is a DOI data call or an



important operational issue, the Deputy Director of Operations communicates directly with the Assistant Regional Directors. Simultaneously, Assistant Directors communicate with their counterparts in the Regional Offices. Because of the open communication culture, the F&WS is able to adapt to operational changes. For example, the F&WS is currently implementing the Financial and Business Management System (FBMS). To meet segregation of duty and internal control requirements, the F&WS is reconfiguring its business practices. While change is not easy, the disruption at the F&WS is minimized because of the open and frequent communication between Headquarters and Regional staff.

As part of its internal communications strategy, the **Executive Office of the United States Attorneys** (EOUSA) provides technical, administrative, design, and maintenance support in the area of video



telecommunications to enhance cooperative efforts among the U.S. Attorneys' Offices (USAOs) and the Department's Litigating Divisions of the Department. The use of video telecommunications is widespread. Staff in branch offices communicates by video teleconferencing with the U.S. Attorney which decreases travel time and expense. To ensure dissemination of policy and procedures to USAOs and transparency, the EOUSA publishes and maintains a United States Attorneys' Manual and a United States Attorneys' Bulletin on the internet for the internal guidance of the USAOs and other organizational units of the Department concerned with litigation.

The **National Park Service** (NPS) recognized that although it communicates well with external audiences, such as park visitors and policy makers, however, the it needed to apply that same level of commitment to addressing internal employee communication needs. To aggressively tackle this challenge, the NPS Workplace Enrichment communications team, with support from the Center for Park Management, contracted with a communications firm to develop an internal communications strategy, which was made available in August 2011.

To understand the current state of NPS internal communications, the consultant conducted an assessment of existing communications. Twenty-two discussion groups were held across the country spanning 20 parks,



five regions, and the Washington Support Office (WASO) - providing representation at various levels and positions throughout the NPS.

It is clear from the consultant's research that every employee – from leaders to the front line – can make immediate positive impacts and set in motion long-term improvements. Six broad strategies emerged from the research:

1. Leaders, managers, and supervisors should consistently communicate the importance of an engaged 21st century workforce for advancing the mission and goals of the NPS
2. Build leader and managerial capacity and accountability around communications skills
3. Design all internal communications to include context and to invite engagement
4. Enhance communications with dedicated resources and better use of information technology
5. Provide employees information and access to consistent and effective tools for recruitment, orientation, and learning and development
6. Conduct a comprehensive diversity and inclusion assessment and implement strategies to create relevance, inclusion, and shared voice in a multicultural context



The NPS's employee opinions, beliefs and ideas have been incorporated into a Communications Strategies Report which will serve as a road map to work towards improving communications with and for all employees over the next two years. The end result is to ultimately promote a culture of effective communications in the NPS workplace.



Options to Improve Indian Affairs' Internal Communications Strategy

OPTIONS

Maximize utilization of the newly launched Indian Affairs intranet site with a promotional campaign and thoughtful communications strategy

Create weekly message from the Assistant Secretary on the intranet to drive employees to the site

Update each support office's intranet page to include, at a minimum, policies and procedures

Create support office specific internet pages that provide comprehensive information surrounding policies and procedures that impact Tribal communities

Create internal communications position within the Office of Public Affairs

Provide timely responses to inquiries, emails, and letters from employees and Tribal governments

Establish an Indian Affairs Employee Work/Life Committee to understand the Best Places to Work ratings and recommend changes including improvements to internal communications and elimination of the barriers for effective communication

Engage DOI OCIO to establish video teleconferencing or Voice over Internet Protocol (VoIP) capability in every facility where there are Indian Affairs employees under DOI IT Transformation

Recommendations

Given the employee and Tribal Leaders' feedback, it is clear that internal communications is lacking in Indian Affairs. Internal communications is a crucial component to any high performing organization. Policy and procedures must be communicated from the top down using vehicles accessible to employees.





To improve the dissemination of policy and procedures, Indian Affairs should launch a promotional campaign and thoughtful communications strategy to increase usage of the newly developed Indian Affairs intranet site. The Indian Affairs’ communications team should work with the Assistant Secretary – Indian Affairs to develop weekly messages to be published on the intranet to drive employees to the site. These messages should also be used to highlight important upcoming events.

Moreover, Indian Affairs should update each support office’s intranet page to include, at a minimum, current policies and procedures. With the “IA Improve” (a suggestion vehicle) and “Ask IA” (a question and answer feature) tools on the new intranet, the Indian Affairs communications team must ensure timely responses to employees.

To improve communications with Tribal Leaders, Indian Affairs should create support office specific internet pages that provide comprehensive information surrounding policies and procedures that impact Tribal communities. Moreover, the Indian Affairs communications team must also ensure and coordinate Indian Affairs-wide capacity to respond to Tribal government inquiries, emails, and letters in a timely manner.

Additionally, to truly better Indian Affairs internal communications, Indian Affairs should create an internal communications position (refer to Appendix I for staffing costs) within the Office of Public Affairs in concert with an Indian Affairs Employee Work/Life Committee to improve internal communications, engage in an assessment of the barriers for effective communication, and implement strategies to overcome those obstacles. This working group should include employees of different levels across all support and program offices in Indian Affairs. Tribal Leaders should also be engaged in this process.

Finally, to build up Indian Affairs’ communications infrastructure, the Office of Public Affairs and the IAIT should jointly engage the DOI OCIO to establish video teleconferencing or Voice over Internet Protocol (VoIP)



capability in every facility where there are Indian Affairs employees under DOI IT Transformation. This would tremendously improve Field employees' ability to access mission critical information, as well as access Indian Affairs leadership.



IMPLEMENTATION PLAN

<p style="text-align: center;">MONTHS 1-6</p>	<ul style="list-style-type: none"> • Launch a promotional campaign and thoughtful communications strategy to promote the new Indian Affairs intranet site • Create weekly message from the Assistant Secretary – Indian Affairs on the intranet to drive employees to the site • Update each support office’s intranet page to include, at a minimum, current policies and procedures • Create support office specific internet pages that provide comprehensive information surrounding policies and procedures that impact Tribal communities • Provide timely responses to inquiries, emails, and letters from employees and Tribal governments • Establish an Indian Affairs Employee Work/Life Committee to understand the Best Places to Work ratings, improve internal communications, engage in an assessment of the barriers for effective communication, and implement strategies to overcome the obstacles
<p style="text-align: center;">MONTHS 7-12</p>	<ul style="list-style-type: none"> • Create an internal communications position within the Office of Public Affairs • In partnership with the IAIT Engage the DOI OCIO to establish video teleconferencing or Voice over Internet Protocol (VoIP) capability in every facility where there are Indian Affairs employees under DOI IT Transformation.



Section IV. Transition to Implementation

Essential to the success of Indian Affairs' operations is an integrated and progressive support service infrastructure designed to function in a highly dynamic environment. When undergoing realignment so soon after a flawed reorganization, the integration and alignment of each administrative function requires: strong communication, respect for both individuals and processes, a shared resolve to find solutions that benefit both mission accomplishment and functional excellence.

Creating functional excellence requires Indian Affairs to create an environment that develops employees, rewards prompt and efficient service, promotes best practices, and shares accountability for the performance of the management support systems that enables Indian Affairs to fulfill its mission. Methods to foster functionally excellent organizations require:

- Investing in the professional development of employees and supervisors to prevent organizational stagnation
- Recognizing and applauding the most customer-service focused employees
- Sponsoring employee-driven (not supervisor-led) continuous process improvement groups

Accountability for excellence is a shared responsibility by all Indian Affairs employees. Complete centralization of support functions caused a lack of focus on prompt customer service and created a distance from the mission of delivering services to American Indians and Alaska Natives. On the other hand, complete decentralization of support functions minimized the importance of compliance with regulations and internal controls. A completely decentralized support services delivery model leaves Indian Affairs at risk for qualified audit opinions and OIG audits that discover waste, fraud, abuse, or mismanagement.

Bronner proposes a hybrid delivery model for Indian Affairs support services. A smaller DAS-M organization will be responsible for setting the standards for functional performance, creating Indian Affairs support office



policies, procedures, and processes, and providing automated solutions to yield greater efficiencies. In this hybrid model, authority over and accountability for local administrative functions will be delegated to the BIA Regional Directors and the BIE Associate Deputy Directors.

If Indian Affairs proceeds with a redesign of DAS-M, then some of the changes may require Congressional notification. For example, if the staff in the Office of Planning and Performance Management (OPPM) is moved to the Office of the Chief Financial Officer (OCFO), then OPPM would be removed from Indian Affairs' organizational chart. This may be an appropriate time for Indian Affairs to do a wholesale revision of its organizational chart. Several corrections could be achieved at the same time. For example, although the Office of Audit and Evaluation is listed under the OCFO, this office no longer exists. Instead, the Office of Internal Assessment and Evaluation is a direct report to the DAS-M. Similarly, Indian Affairs could proceed with its plans to move the Office of Federal Acknowledgement to the Deputy Assistant Secretary – Policy & Economic Development. And, Indian Affairs could move the Office of Gaming to the Principal Deputy Assistant Secretary and the Office of Regulatory Affairs and Collaborative Action to DAS-M.

Moving forward, a critical element to the success of any potential organizational adjustment within Indian Affairs will be a strong, proactive communications and change management program. Simply stated Indian Affairs employees and Tribal Leaders should be engaged by the Assistant Secretary and other Department officials immediately, giving all parties adequate time to understand and digest potential changes.

A range of activities are suggested in building the recommended communications and change management program:

- Author a thematic statement that clearly and concisely explains the desired changes. Example: "A New Day for Indian Affairs".
- Conduct face-to-face meetings with Indian Affairs employees hosted by the Assistant Secretary. Organizational change has the unintended consequence of raising anxiety amongst employees,



regardless of their exposure to the potential change. The Assistant Secretary should take steps to show personal interest in mitigating this anxiety.

- Consult with the Tribal Leaders. As the primary mission and focus of Indian Affairs is to enhance the quality of life for American Indians and Alaska Natives, the Assistant Secretary should conduct Consultations to provide Tribal Leaders with an overview of the proposed changes and solicit feedback. Then, provide regular updates regarding the progress toward implementation.
- Convene a working group of employees across Indian Affairs. It is critical that employees be given a prominent role in managing any organizational change.
- Designate a Project Manager. Federal employees have existing workloads that prevent most from managing the day-to-day roster of activities involved in organizational change. Indian Affairs should identify one employee to manage the initiative.

In sum, successful implementation requires three elements: strong executive leadership, employee engagement, and Tribal Leadership involvement.



Section V. Appendices



Appendix A: Interview List

ONE-ON-ONE INTERVIEWS CONDUCTED BY THE BRONNER GROUP		
Tribal Leaders		
Name	Title/Position	Tribe
Brenda Fields	Grants and Contracts Officer	Penobscot Indian Nation
Brian Patterson	President	United South and Eastern Tribes
Darrell Seki	Treasurer	Red Lake Band of Chippewa
Donna Buckles-Whitmer	Council Member, Ft. Peck Tribal Executive Board	Ft. Peck Tribes
Gary Hayes	Vice - Chairman	Ute Mountain Ute Tribe
Gloria O'Neill	President	Cook Inlet Tribal Council
John D. Red Eagle	Principal Chief	Osage Nation
Lester Randall	Tribal Council Member	Kickapoo Tribe in Kansas
Loretta Bullard	President	Kawerak Inc.
Mark Montano	Director of Tribal Operations	Red Cliff Band of Lake Superior
Mervin Wright Jr.	Vice Chairman	Pyramid Lake Paiute Tribe
Michael Jandreau	Chairman	Lower Bruel Sioux Tribe
Rick Gay	Manager Grants and Contracts	Confederated Tribes of the Umatilla Reservation
Robert Smith	Chairman	Pala Band of Mission Indians
Robert Tippeconnie	Treasurer	Comanche Nation
Rodney Bordeaux	President	Rosebud Sioux Tribe
Tex Hall	Chairman	Three Affiliated Tribes
Timothy Hinton Sr.	Vice-Chairman	White Mountain Apache Tribe
Tom Gamble	Chief	Miami Tribe of Oklahoma
Tracy King	President	Fort Belknap Community Council
W. Ron Allen	Chairman	Jamestown-S'Klallam Tribe

Indian Affairs Managers/Supervisors and Employees		
Name	Title/Position	Bureau/Office
Al Foster	Associate Director for Information Resources	Indian Affairs Information Technology (IAIT)
Alvin Windy Boy	Acting Supervisory Contracting Officer-Great Plains Region, Acquisition and Property Management	Deputy Assistant Secretary Management (DAS-M), Office of the Chief Financial Officer (OCFO)
Bart Stevens	Associate Deputy Director West	Bureau of Indian Education (BIE)
Brenda Cannon	Program Analyst	DAS-M/Office of Planning & Performance Management (OPPM)
Brian Drapeaux	Chief of Staff	BIE
Bryan Bowker	Regional Director, Western Region	Bureau of Indian Affairs (BIA)
Carl Cook	Supervisory Human Resources Specialist IT-Anadarko, OK	DAS-M, Office of Human Capital Management (OHCM)
Carl Renville	Supervisor, Labor Relations	DAS-M/OHCM
Cathy Black	Budget Officer-Western and Northwestern Regions, Office of Budget Management	DAS-M/OCFO
Cecilia Clark	Financial Manager-Southwest Region, Office of Budget Management	DAS-M/OCFO
Cherie Farlee	Education Program Administrator	BIE
Christine Cho	Director, Office of Program Management and Business Services	DAS-M/IAIT
Darren Cruzan	Director, Justice Services	BIA
David Roberts	Director, Division of Information Security and Privacy	DAS-M/IAIT

Indian Affairs Managers/Supervisors and Employees		
Name	Title/Position	Bureau/Office
David Talayumptewa	Assistant Deputy Director	BIE
Debbie Doka	Budget Analyst-Pacific Region, Office of Budget Management	DAS-M/OCFO
Del Laverdure	Principal Deputy Assistant Secretary	Office of the Assistant Secretary of Indian Affairs
Ellen Findley	Acting Chief of Staff	DAS-M/IAIT
Eunice Clah-Netson	Accounting Officer-Western Region, Office of Budget Management	DAS-M/OCFO
Gabe Morgan	Chief of Staff	BIA
George Skibine	Deputy Assistant Secretary, Management	DAS-M
Gerald Shipman	Deputy Director of Acquisition and Property Management	DAS-M/OCFO
J. Andre King	Program Analyst	DAS-M/OPPM
Jack Rever	Director	DAS-M/ Office of Facilities, Environmental, and Cultural Resources (OFECR)
Jackie Cheek	Special Assistant	BIE
James Burckman	Director of Human Capital Management	DAS-M/OHCM
Jason Thompson	Deputy Director, Justice Services	BIA
Jeanette Hanna	Regional Director, Eastern Oklahoma Region	BIA
Jeanie Cooper	Deputy Director	DAS-M/OHCM

Indian Affairs Managers/Supervisors and Employees		
Name	Title/Position	Bureau/Office
Jeffrey Hamley	Associate Deputy Director	BIE
Jim Hastings	Education Program Administrator, Arizona South Education Line Office	BIE
Jocelyn Little Chief	Supervisory Contract Specialist-Southern Plains Region, Acquisition and Property Management	DAS-M/OCFO
Jodi Gillette	Deputy Assistant Secretary	Policy and Economic Development
John Ashley	Acting Director of Operations	DAS-M/IAIT
Jon Claymore	Education Program Administrator, Seattle Line Office	BIE
Jose Saavedra	Supervisory Auditor	DAS-M Office of Internal Evaluation & Assessment (OIEA)
Kathy Daum	Director of Acquisition and Property Management	DAS-M/OCFO
Keith Moore	Director	BIE
Kevin Martin	Director of Budget	DAS-M/OCFO
Larry Echo Hawk	Assistant Secretary	Indian Affairs
Marlene Virden	Supply Management Officer-Midwest Region, Office of Acquisition and Property Management	DAS-M/OCFO
Michael Olivia	Director	DAS-M/OIEA
Michele Singer	Director	Office of Regulatory Affairs and Collaborative Action
Mike Black	Director	BIA
Mike VanDermyden	Director of Special Projects	DAS-M/IAIT
Patricia Vendzules	Management Analyst	DAS-M/OIEA

Indian Affairs Managers/Supervisors and Employees		
Name	Title/Position	Bureau/Office
Paul Tsosie	Chief of Staff	Office of the Assistant Secretary of Indian Affairs (AS-IA)
Paula Hart	Director	Office of the Deputy Assistant Secretary Policy & Economic Development (DAS-PED), Office of Indian Gaming
Renee Holly	Supervisory Contract Officer- Western Region, Office of Acquisition and Property Management	DAS-M/OCFO
Robert Middleton	Director	DAS-M/OPPM
Roxanne Brown	Associate Deputy Director East	BIE
Sharee Freeman	Director	DAS-PED, Office of Self Governance
Stephen Manydeeds	Director	DAS-PED/Office of Indian Energy and Economic Development
Teresa Crews	Acting Director of Fiscal Services Division	DAS-M/OCFO
Terri Cady	Supervisory Contract Specialist-Great Plains Region	DAS-M/OCFO
Twyla Stange	Supervisory Budget Officer- Northwest Region	DAS-M/OCFO
Van Tran	Director of Financial Management	DAS-M/OCFO
Vicki Forrest	Chief Financial Officer	DAS-M/OCFO
Wayne Dunbar	Supervisory Auditor	DAS-M/OIEA
Willie Chism	Privacy Act Officer	DAS-M, IAIT
Wynette Satoe	Property Officer-Southern Plains Region	DAS-M/OCFO

Department of the Interior Officials

Name	Title/Position	Office
Andrew Jackson	Deputy Assistant Secretary for Technology, Information and Business Services	Office of Policy, Management and Budget (PMB)
Bruce Sheaffer	Comptroller	National Park Service (NPS)
David J. Hayes	Deputy Secretary	Office of the Deputy Secretary
Grayford Payne	Deputy Commissioner, Policy, Administration and Budget	Bureau of Reclamation
Jerry Simpson	Associate Director, Workforce Management	NPS
Laura Davis	Chief of Staff	Office of the Secretary
Pam Haze	Deputy Assistant Secretary for Budget, Finance, Performance & Acquisition	PMB
Pam Malam	Deputy Assistant Secretary - Human Capital and Diversity	PMB
Rowan W. Gould	Deputy Director	Fish and Wildlife Service
Tiffany Taylor	Budget Analyst	PMB

Vanessa Green	Chief, Employment Complaints Processing & Adjudication	Office of Civil Rights
Other Interviews		
Name	Title/Position	Department/Office
Chris Jones	Director	Office of Management Services, Indian Health Services (IHS)
Darrell LaRoache	Director	Office of Clinical an Preventive Services, IHS
David McMahon	Institutional Environmental Health Program Manager	Office of Environmental Health and Engineering, IHS
Gene Robinson	Management Analyst	Office of Public Health Support, IHS
Iris Merscher	Contract Specialist	Office of Management Services, IHS
Kathy Hanson	Chief of Training and Development, Learning and Development Division	NPS
Katherine Gugulis	Deputy Director for Administration and Management	Department of Justice, Executive Office for U.S. Attorneys
Lucie Vogel	Principle Planner	Office of Public Health Support, IHS
Mary Drapeaux	Human Resources Specialist	IHS

Other Interviews		
Name	Title/Position	Department/Office
Michelle Rossell	Human Resources Specialist, Employee Relations/Labor Relations	IHS
Raymond Cooke	Acting Director, Division of Facilities Planning and Construction	Office of Environmental Health and Engineering, IHS
Ron Ferguson	Director, Division of Sanitation Facilities Construction	Office of Environmental Health and Engineering, IHS
Sam Brewster	Program Analyst	Office of Management Services, IHS

APPENDIX B: EVALUATION OF 1999 NAPA RECOMMENDATIONS

Evaluation of the 1999 National Academy of Public Administration Recommendations

In 1999, the National Academy of Public Administration (NAPA) asserted that “the Bureau [of Indian Affairs] needs to establish credibility and prove it has the capacity to properly determine requirements and utilize the resources efficiently and effectively.” NAPA noted that BIA’s inability to satisfy Government Performance and Results Act (GPRA) requirements showed an absence of commitment and operational planning. The report consequently recommended implementing a new management review system: a performance management and accountability system would link to strategic choices and budgetary decisions.

When NAPA conducted its evaluation in 1999, administrative and management services were not provided by a central administrative office reporting to the Assistant Secretary – Indian Affairs. Today, administrative services are provided through the support offices that report to the Deputy Assistant Secretary – Management. Bronner assessed the current support services operations and determined the degree to which the improvements recommended by NAPA have or have not been implemented. In addition, Bronner analyzed whether Indian Affairs implemented a recommendation and if the recommended action is being performed well, poorly, or if the recommended implemented action is working as predicted.

NAPA Recommendations – Managing for Success	BRONNER Assessment in 2011
Establish a Policy, Management, and Budget Office that reports to Assistant Secretary – Indian Affairs with these offices:	Indian Affairs established the office of the Deputy Assistant Secretary – Management (DAS-M) that reports to the Assistant Secretary – Indian Affairs. Under the purview of DAS-M is the Office of the Chief Financial Officer that includes an Office of Budget Management. Performance management is under DAS-M’s Office of Planning and Performance Management. Responsibility for policy retention currently resides with the Office of Regulatory Affairs and Collaborative Action that reports to the Principal Deputy Assistant Secretary of Indian Affairs.
Comptroller unit with three branches:	A Comptroller unit was not established; rather, Indian

APPENDIX B: EVALUATION OF 1999 NAPA RECOMMENDATIONS

<p align="center">NAPA Recommendations – Managing for Success</p>	<p align="center">BRONNER Assessment in 2011</p>
<ul style="list-style-type: none"> • program analysis group to analyze the appropriateness and effectiveness of programs and services designed to fulfill BIA’s mission • budget development and execution group to prepare the budget and track expenditures • accounting group to operate BIA’s financial accounting system 	<p>Affairs established the Office of the Chief Financial Officer.</p> <p>The functions of the recommended branches are administered through the following offices:</p> <ul style="list-style-type: none"> • program analysis is performed by the Office of Planning & Performance Management • budget development and execution are performed by the Office of Budget Management under the Office of the Chief Financial Officer (OCFO) • accounting is performed by the Office of Financial Management – also under OCFO
<p>Plans and policy unit responsible for developing:</p> <ul style="list-style-type: none"> • BIA management policies and directives • Strategic and annual plans • Manuals and operating handbooks 	<p>Indian Affairs established an Office of Policy, Planning and Performance Management. However, this office has been recently reorganized. Policy dissemination, along with responsibility for manuals and operating handbooks, is now administered through the Office of Regulatory Affairs and Collaborative Action. The Office of Planning and Performance Management is responsible for strategic and annual performance plans.</p>
<p>Human resources management unit to :</p> <ul style="list-style-type: none"> • Develop policy and plans for managing BIA’s workforce, including policy development and workforce planning • Employee development program • Expertise in labor relations • Oversight of the delivery of personnel services 	<p>The Assistant Secretary - Indian Affairs established the Office of Human Capital Management (OHCM) under DAS-M.</p> <ul style="list-style-type: none"> • OHCM is responsible for workforce policy development and workforce planning. OHCM has not developed a human capital succession plan. • OHCM is responsible for the employee development program. The Indian Affairs Leadership Development Program was discontinued in FY 2011 due to budget constraints. Employee training is

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<p>NAPA Recommendations – Managing for Success</p>	<p>BRONNER Assessment in 2011</p>
	<p>provided through the employing office using discretionary funds. Employee development training is conducted through DOI Learn, if at all.</p> <ul style="list-style-type: none"> • Staff in OHCM has expertise in labor relations. • Rather than oversight responsibilities, OHCM has operational responsibilities for the delivery of personnel services.
<p>Information resource management unit responsible for:</p> <ul style="list-style-type: none"> • Developing policy and plans of BIA-wide IT systems • Operation of BIA-wide systems • Guidance on useful IT applications and systems • Strategic IT planning 	<p>After the NAPA study, Indian Affairs established the Office of the Chief Information Officer (OCIO – Indian Affairs).</p> <p>In 2011, OCIO-Indian Affairs changed its name pursuant to Department of the Interior (DOI) Secretarial Order (S.O.) 3309 and went under the management authority of the DOI. With DOI now having only one Chief Information Officer (CIO) and one OCIO, OCIO-Indian Affairs is now named as Indian Affairs Information Technology (IAIT). IAIT is headed by the Assistant Director for Information Resources (ADIR), which is the new title of the Indian Affairs CIO.</p> <p>The recommended responsibilities are under the purview of the IAIT.</p>

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<p align="center">NAPA Recommendations – Managing for Success</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>Equal Employment Opportunity (EEO) unit</p> <ul style="list-style-type: none"> • Manage BIA’s EEO program 	<p>Originally, the EEO Office was located in human resources, but then it was moved to BIA. The BIA EEO Office provided services to both BIA and BIE employees. Pursuant to DOI policy, employees in DAS-M and the Office of the Assistant Secretary – Indian Affairs receive EEO services from the DOI Office of Civil Rights (OCR). While under BIA’s management, the EEO Office was not able to carry out its statutory EEO responsibilities. The backlog of complaints and the inability to meet regulatory deadlines became so severe that, in June 2009, the DOI OCR took over day-to-day operation of the EEO program at BIA.</p> <p>The EEO functions for BIA and BIE remain in “receivership” or under the control of the OCR. Indian Affairs will not be eligible to resume responsibility for the EEO Office until they have sufficient staff, provided EEO training for all supervisors on employees’ rights and management’s responsibilities, and demonstrated a commitment to provide quality and timely service.</p>
<p>Utilize a working group of the Domestic Policy Council to coordinate and harmonize programs for American Indians and Alaska Natives to create a more effective and efficient delivery of services</p>	<p>This is a policy recommendation that is not part of the scope of this assessment.</p>

<p align="center">NAPA Recommendations – Organizational Interaction</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>The Deputy Commissioner for the Office of Indian Programs should continue as the head of the Office of Indian Programs</p>	<p>This is a policy recommendation that is not part of the scope of this assessment.</p>
<p>The Assistant Secretary – Indian Affairs should appoint</p>	<p>This is a policy recommendation that is not part of the</p>

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NAPA Recommendations – Organizational Interaction	BRONNER Assessment in 2011
Directors to head the Office of Indian Education Programs and the Office of Law Enforcement Services	scope of this assessment.
The Assistant Secretary –Indian Affairs should recognize the three service-providing organizations as independent operating entities, with each having responsibility and authority for providing programs and services and for handling its own administrative functions.	This is a policy recommendation that is not part of the scope of this assessment.

NAPA Recommendations – Need for More Managerial Discipline	BRONNER Assessment in 2011
<p>The Assistant Secretary-Indian Affairs should continue to strengthen its strategic plan and companion annual performance plan to meet GPRA requirements.</p> <ul style="list-style-type: none"> • Supplemented with goals and performance measures in administrative and management arenas • Deputy Commissioner, education and law enforcement directors and area and agency managers need to participate in preparing the plans and should be held accountable for executing them. 	<p>The Office of Planning and Performance Management provides guidance and technical assistance for Indian Affairs’ performance management plan, focusing on results and the efficient delivery of those results to improve organizational effectiveness. The Directors of BIE and BIA support the creation of the program performance plan and are accountable for the programs’ effectiveness. Communication about program performance results among senior leadership in Indian Affairs could be timelier.</p>
<p>The Assistant Secretary-Indian Affairs should establish a system of:</p> <ul style="list-style-type: none"> • Management reviews • Performance measures • Regular reviews <p>The plans and policy unit of the proposed Policy, Management, and Budget Office should develop and maintain manuals and handbooks that can be available to all employees.</p>	<p>The Office of Internal Evaluation and Assessment conducts program assessments and transmits findings to the Directors of BIA and BIE or the DAS-M. The BIA and BIE Directors and the DAS-M are not required to submit a corrective action plan in response to the program assessments.</p> <p>Pursuant to Office of Management and Budget (OMB) Circular A-123, the Office of Internal Evaluation and Assessment manages an extensive internal management review of key internal controls.</p>

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<p align="center">NAPA Recommendations – Need for More Managerial Discipline</p>	<p align="center">BRONNER Assessment in 2011</p>
	<p>The Office of Regulatory Affairs and Collaborative Action has posted the Indian Affairs Manual and the BIA Manual on the Indian Affairs intranet site. Updating the Indian Affairs Manual is an on-going process. Unfortunately, the intranet site is not sophisticated enough to provide a robust search engine so that employees can do a word search for a policy or procedure. Also, not all employees use the intranet or are familiar with the location of the manuals.</p>
<p>BIA manual should be updated and kept current.</p> <ul style="list-style-type: none"> • Operating handbooks that clearly define the authorities and responsibilities of field personnel also should be developed. • Modern information technology should be used to support interactive development of policy manuals and directives and their distribution to the field. 	<p>The Office of Regulatory Affairs and Collaborative Action posted a complete BIA Manual on the Indian Affairs intranet site. They also did a crosswalk of the BIA Manual with the Indian Affairs Manual so that staff can see what sections have been updated, what updates are in progress, and what sections have not been updated. Unfortunately, the intranet site is not sophisticated enough to provide a robust search engine so that employees can do a word search for a policy or procedure. Most DAS-M offices have not used the intranet as a communications tool, as effectively as possible, to disseminate policies, procedures, how-to manuals, or flow charts.</p>

<p align="center">NAPA Recommendations – Human Resources</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>The Assistant Secretary-Indian Affairs should reestablish a human resources (HR) management unit of four to six people, headed by a human resources manager in the proposed Policy, Management, and Budget Office.</p> <ul style="list-style-type: none"> • This unit should be responsible for establishing and maintaining a consistent approach to human resources management throughout BIA. 	<p>Rather than create a small human resources policy office, in 2004-2005 Indian Affairs established the Office of Human Capital Management (OHCM) under DAS-M to provide both policy and operational support. The Director’s Office has five employees. The remaining 95 employees are in five offices across the country.</p>

APPENDIX B: EVALUATION OF 1999 NAPA RECOMMENDATIONS

<p align="center">NAPA Recommendations – Human Resources</p>	<p align="center">BRONNER Assessment in 2011</p>
<ul style="list-style-type: none"> • The manager should have access to and participate with top management in decisions that affect BIA employees; should develop a strategic human resources management plan; and should identify the policies BIA is following and establish a mechanism for assuring they are applied consistently throughout the Bureau. 	<ul style="list-style-type: none"> • The Director of OHCM is responsible for creating and implementing consistent human resources policies and procedures across Indian Affairs. • The Director of OHCM has access to and participates with top management in decisions that affect BIA employees. • OHCM has not developed a strategic human resources workforce or succession plan.
<p>This HR unit should ensure the following:</p> <ul style="list-style-type: none"> • BIA makes employee development one of its primary management objectives and provides the planning and resources to support training and development • BIA begins succession planning and development to meet its managerial and executive needs • BIA automates its personnel record-keeping so that summary information about employees is readily available and accessible • BIA’s qualification requirements for its jobs are sufficiently stringent that candidates who meet them will be able to do the job • The units providing BIA personnel operations support are performing effectively 	<p>OHCM’s current status of service offerings:</p> <ul style="list-style-type: none"> • Employee Development: No funds are centrally available in FY 2011 to support training and development programs. Employee training is supported locally with discretionary funds. Training is conducted, if at all, through DOI Learn, a web-based source of courses/trainings. • Succession Planning: There are no succession plans. Currently, 13.94% of all Indian Affairs employees are eligible to retire. An even greater number of the DAS-M workforce, 21.1%, is eligible to retire. • Automate HR Records: e-OPF (electronic OPF) has been completed. • Stringent Job Qualifications: OPM establishes qualifications for a position. A selection for an Indian Preference position may be made if the candidate meets minimal qualifications pursuant to Federal statute. OHCM and the Hiring Managers rarely use specialized experience qualifications in vacancy announcements. • Effective Operations: Operations are in compliance with OPM regulations. However, many customers

APPENDIX B: EVALUATION OF 1999 NAPA RECOMMENDATIONS

<p align="center">NAPA Recommendations – Human Resources</p>	<p align="center">BRONNER Assessment in 2011</p>
	<p>do not view the hiring process as efficient or effective.</p>
<p align="center">NAPA Recommendations – Budget System</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>The Assistant Secretary-Indian Affairs should develop a budgeting system that has sufficient flexibility to support the equitable allocation of funds</p>	<p>The current budget formulation process is flexible and includes priorities from the Tribal Interior Budget Committee. Indian Affairs currently employs a group decision process that convenes close in time to the required budget submission to the Department of the Interior (DOI), Office of Policy, Management, & Budget. With additional pre-planning, including consideration of programmatic performance outcomes, the effectiveness of the Indian Affairs budget formulation process could be improved.</p>
<p>The budget development and execution group in the comptroller unit of the proposed Policy, Management, and Budget Office should work with the BIA and the tribes to develop the budget and document appropriate standards (or benchmarks) that can be used consistently in support of budget requests and in measuring performance in the delivery of programs</p>	<p>The budget staff in the Budget Management Office are generalists, performing both formulation and execution work. The budget analysts work with the BIA and BIE program staff to develop the budget. The budget process could be improved if the budget staff had a more comprehensive understanding of the BIA and BIE programs. The Office of Planning and Performance Management staff participates in the budget formulation process, but not until late in the budget development. The Tribal Interior Budget Committee provides input on priorities to Indian Affairs leadership.</p>

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<p align="center">NAPA Recommendations – Financial Management</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>The Assistant Secretary-Indian Affairs should establish an accounting group in the comptroller unit of the proposed Policy, Management, and Budget Office to work hand-in-hand with BIA management to:</p> <ul style="list-style-type: none"> • Continue the drive toward a clean audit • Prevent the reoccurrence of material weaknesses, and • Correct possible problems that go deeper than the issue of a clean audit (establish long term solutions) 	<p>The Assistant Secretary – Indian Affairs established an Office of the Chief Financial Officer that includes an Office of Financial Management.</p> <ul style="list-style-type: none"> • In recent years, Indian Affairs has achieved an unqualified or “clean” audit from the independent financial auditors. • The Office of Internal Evaluation and Assessment conducts regular reviews of internal controls and monitors corrective action plans. Continued vigilance is required to ensure that issues are corrected timely and a proactive approach is taken to assist in preventing material weaknesses. • While the Office of Internal and Evaluation and Assessment conducts regular reviews of internal controls and monitors corrective action plans, it is up to each Office’s leadership to promote a culture of continuous improvement, which recognizes internal control weaknesses and develops procedures to correct problems.
<p>Toward those ends, the new office would be responsible for the following:</p> <ul style="list-style-type: none"> • Finalizing and approving a series of implementation plans for corrective actions on all audit issues and material weaknesses <ul style="list-style-type: none"> ▪ supporting coordination and monitoring implementation using a report card system ▪ maintaining important administrative processes ▪ improving documentation of policy and procedures in tandem with that effort 	<ul style="list-style-type: none"> • The OCFO has been diligent in implementing corrective action plans to address audit issues. • OCFO could benefit from additional scorecards and metrics to track performance. • The OCFO provides monthly score cards of Undelivered Orders (UDO) certifications. The synchronization between the systems of financial management and procurement on the UDO list could be improved so that inaccuracies and discrepancies are prevented. • OCFO could consider posting policies, procedures, and checklists on the Indian Affairs intranet or on an OCFO SharePoint site to document important financial processes.

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<p align="center">NAPA Recommendations – Financial Management</p>	<p align="center">BRONNER Assessment in 2011</p>
<ul style="list-style-type: none"> • Upon project completion, holding detailed retrospective meetings of management and accountable staff to discuss/document what went right and what went wrong (planned versus actual outputs and outcomes) 	<p>The OCFO staff would benefit from regular lessons-learned meetings.</p>
<ul style="list-style-type: none"> • Increasing current efforts to document all financial policy and procedures (with hands-on involvement by the area and agency offices) and getting those documents out into the field 	<p>The practice has been to develop financial policy and procedures in the headquarters CFO office. The policies/procedures are then transmitted to staff in the field via memorandum that includes an attachment of policy documents. OCFO’s communication with the staff and customers could benefit from improving its content on the intranet, so that all policies and procedures are centrally located.</p>
<ul style="list-style-type: none"> • Correcting the serious shortage of administrative staff needed to perform financial duties (currently many functions are collateral duties of overworked staff who lack adequate knowledge or training) 	<p>Shortages of qualified staff remain an area of concern.</p> <p>The OCFO offers regular training on themes such as Prompt Pay, Annual Collection Officer training, etc.</p>
<ul style="list-style-type: none"> • Involving field offices more in the development of policy and procedures 	<p>The Field has been very responsive to recent visits from the CFO. The development of policies and procedures is performed at Headquarters (Central Office).</p>
<ul style="list-style-type: none"> • Providing up-to-date computer software versions that are consistent across BIA 	<p>The Indian Affairs Information Technology (IAIT) organization, formerly OCIO-Indian Affairs, has standardized software across Indian Affairs. To date, Indian Affairs has not offered an alternative suite of educational hardware and software to BIE for use in BIE schools.</p>
<ul style="list-style-type: none"> • Increasing the level of coordination, follow-through, and communication among the different field offices 	<p>Frequent communication concerning the status of contract requests between headquarters and the field offices would improve coordination.</p>

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<p align="center">NAPA Recommendations – Information Resource Management</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>The Assistant Secretary-Indian Affairs should establish a full-time chief information officer (CIO) in the proposed Policy, Management, and Budget Office to work hand-in-hand with management to bring the full benefits of information technology to BIA. The CIO would direct the activities of the Office of Information and Resource Management (OIRM) and would be responsible for the following:</p>	<p>The Assistant Secretary-Indian Affairs created the Office of Chief Information Officer (OCIO) in the 2003-2004 re-organization. This structure prevailed until 2011 when DOI consolidated its IT infrastructure for more standardized functions across all components.</p> <p>In this organizational streamlining effort, DOI will only have one Chief Information Officer (CIO) and one Deputy CIO under the DOI OCIO. The DOI CIO will oversee and manage DOI’s IT infrastructure and IT Transformation Initiative. What were formerly Bureau CIOs are now Associate Directors for Information Resources (ADIRs), who directly report and coordinate with the DOI-OCIO. All IT functions and activities, particularly the Secretary’s IT Transformation initiative, are aimed to be coordinated and aligned across the DOI enterprise.</p> <p>Indian Affairs’ OCIO is now referred to as Indian Affairs Information Technology (IAIT).</p>
<ul style="list-style-type: none"> • Creating an IRM users group with representatives of BIA management and operators to provide guidance in identifying potential information technology applications. Likewise, the CIO can use the users group to communicate new technologies that may be applicable to BIA 	<p>A significant and persistent challenge for the IAIT organization is to ensure that the users’ inputs are incorporated into IT systems and applications design, development and management. There is no single, overarching user group; however, user input, communications and collaboration have been generated in several ways.</p> <p>An IT Review Board is responsible for IT governance and has representation from the Office of the Assistant Secretary – Indian Affairs, BIA and BIE senior managers. Further, an Indian Affairs Web Council</p>

<p>NAPA Recommendations – Information Resource Management</p>	<p>BRONNER Assessment in 2011</p>
	<p>coordinates Indian Affairs staffs who manage the content of Indian Affairs internet and intranet.</p> <p>IAIT has recently established a division, Program Management and Business Services, which is tasked to coordinate with programs and users in determining business requirements. This division essentially executes IAIT’s Customer Relationship Management (CRM) strategy and function, with focus on working closely with its internal and external stakeholders in delivering customer requirements. In line with the overarching DOI IT Transformation, CRM functions will specifically work with Indian Affairs customers to identify new service requirements and measure their satisfaction relative to performance metrics.</p> <p>Further, IAIT’s other service planning, management and delivery functions are also expected to actively solicit input from employees to determine areas for improvement and technology requirements, resolve current IT issues, develop process or IT solutions, and ensure overall success of DOI IT Transformation.</p> <p>Reaching out to the users has also been a crucial component of the DOI IT Transformation Initiative’s “Listening Sessions.” Implementation phases include formalizing enterprise CRM functions, including establishment of Customer Councils and Customer Care Centers.</p>
<ul style="list-style-type: none"> • Establishing a BIA-wide communication strategy to link the Bureau together 	<p>IAIT is now working with DOI’s OCIO in implementing the broader, enterprise-wide DOI IT Transformation goal of “enhancing how employees of the Department communicate and collaborate with each other, external</p>

<p>NAPA Recommendations – Information Resource Management</p>	<p>BRONNER Assessment in 2011</p>
	<p>stakeholders, and the public.”</p> <p>The Department-wide strategies include the following major components:</p> <ul style="list-style-type: none"> • Unified Messaging, where all DOI employees will use one email system and related messaging capabilities, including desktop and mobile videoconferencing • Telecommunications, which will focus on enhancing IT infrastructure and services that enable employees to communicate with each other across departments and physical boundaries <p>It will be important for IAIT to focus on BIA and BIE-specific concerns and capabilities within the overall communications strategy of the DOI IT Transformation. For example, users have cited that the Indian Affairs intranet site is not robust and lacks search capability, which hinders users from relying on the intranet as a primary source of communication throughout Indian Affairs.</p> <p>From a management perspective, both IT staff and users recognize that communication processes can still be improved.</p>
<ul style="list-style-type: none"> • Establishing the requirements for information technology training 	<p>Specialized technical training is typically designed and incorporated in the deployment of new or upgraded systems, e.g. Windows 7, which will be rolled out by the end of calendar year 2011.</p> <p>General IT skills training, including use of MS Office</p>

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NAPA Recommendations – Information Resource Management	BRONNER Assessment in 2011
	<p>software, is determined by supervisors and employees and can be planned and acquired through the recently upgraded DOI Learn Portal. The portal is part of the DOI University, which provides DOI employees with a wide range of training solutions.</p> <p>At this point, there is no general IT training requirements and delivery other than those provided via the DOI Learn Portal.</p>

NAPA Recommendations – Records Management	BRONNER Assessment in 2011
<p>The CIO in the new Policy, Management, and Budget Office should be responsible for BIA non-trust records management and should ensure that systems are up-to-date and reliable. The CIO should carry out the following recommendations:</p>	
<ul style="list-style-type: none"> Establish records management policy and oversee the preparation of a records management policy implementation manual 	<p>The Indian Affairs Records Management Manual (IARMM) was issued by the Office of the Special Trustee for American Indians (OST), Office of Trust Records (OTR), and establishes policy and procedures for safeguarding the Privacy Act systems of trust records created and maintained by Indian Affairs and OST in the course of conducting trust transactions on behalf of Indian Tribes, Alaska Natives, and individual Indians.</p>
<ul style="list-style-type: none"> Develop a BIA-wide plan to upgrade records management, building on the Trust Management Improvement Project 	<p>Since the NAPA study, several custom or enterprise solutions have been developed to improve records management, particularly tracking records in various transaction stages, and even automating processes for better information capture and retention.</p> <p>In addition, the DOI IT Transformation has identified</p>

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NAPA Recommendations – Records Management	BRONNER Assessment in 2011
	<p>“Records and Archives” as one of the additional four high-priority focus areas. IAIT will work with the DOI OCIO in further enhancing services that ensure compliance with record keeping responsibilities for non-trust records in a more efficient and integrated manner and will include the following specific areas:</p> <ul style="list-style-type: none"> • Electronic and manual records management • Legal holds process • Dual permanency
<ul style="list-style-type: none"> • Establish accountability for records management in each major organizational element 	<p>IAIT, through its Information Security and Privacy Division, coordinates with OST to ensure Indian Affairs is in compliance with the IARMM. The Division has a limited staff of four to perform inspections across Indian Affairs.</p>
<ul style="list-style-type: none"> • Conduct an examination of the retention schedules for all types of documents and records to determine if they are still current and being applied consistently 	<p>OTR, a division within OST, coordinates with Indian Affairs’ offices in developing records schedules and provides training and technical assistance in the implementation of the record schedules.</p> <p>The IARMM has a process of reviewing and updating retention schedules.</p>
<ul style="list-style-type: none"> • Ensure that all its records management is integrated with the OST and is reviewed annually to determine that the integration is still valid 	<p>IAIT’s Information Security and Privacy Division is primarily responsible for coordinating with OST in ensuring compliance with the IARRM and updating the manual as applicable.</p>

NAPA Recommendations – Procurement Management	BRONNER Assessment in 2011
<p>The Assistant Secretary should establish a procurement policy and quality assurance function within the proposed Policy, Management, and Budget Office.</p>	<p>The Office of Acquisition and Property Management was established within the OCFO under DAS-M. The Office of Internal Evaluations & Assessment manages quality</p>

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NAPA Recommendations – Procurement Management	BRONNER Assessment in 2011
	assurance through the OMB A-123 reviews.
<ul style="list-style-type: none"> The Assistant Secretary should consider abolishing BIA’s central procurement organization and contracting for procurement services from other sources within the government. IF BIA contracts for these services, it should maintain the field capability to meet procurement needs up to a reasonable limit (say, \$100,000). 	<p>Indian Affairs has a centralized procurement office. There are procurement office representatives in the field, who report to supervisors in the OCFO. The procurement staff is trained per the government-wide regulations. Nevertheless, the BIA and BIE customers have expressed concern with the speed of the procurement/acquisition process.</p> <p>The BIE and BIA purchase authority is severely limited. They have micro purchase authority for services at \$2,500 and supplies at \$3,000. Thus, any purchase in excess of \$3,000 must be approved by a warranted contract officer.</p>
<ul style="list-style-type: none"> If central procurement is retained, the Deputy Commissioner should develop an action plan to correct the deficiencies identified in the recent DOI Acquisition Management Review. The Assistant Secretary and his staff should closely monitor implementation of the action plan and hold the Deputy Commissioner responsible for its implementation. 	<p>All purchases in amounts in excess of \$3,000 are approved by the OCFO Office of Acquisition. The volume of procurement actions appears to have overwhelmed the Office.</p>

NAPA Recommendations – Managing for Results (Recommended Benchmarks)	BRONNER Assessment in 2011
<p>The following are a set of management milestones and specific plans for achievement of tangible results, including:</p>	
<ul style="list-style-type: none"> A clean audit within a reasonable period of time, as agreed to by the DOI inspector 	<p>This recommendation has been achieved. Indian Affairs has an unqualified or “clean” audit.</p>

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<p align="center">NAPA Recommendations – Managing for Results (Recommended Benchmarks)</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>general, in light of other urgent tasks that the Bureau must address</p>	
<ul style="list-style-type: none"> Well-documented estimates of program requirements and employee development that are accepted by the DOI, Office of Management and Budget (OMB), and the appropriations committees as credible, regardless of the funding levels ultimately achieved (i.e. denial of resources on the basis of competing budget and fiscal priorities rather than concern that the estimates are unsound or that appropriations will not be well spent) 	<p>Indian Affairs continues to make progress in submitting well-documented estimates of program requirements and program achievements. More effort needs to be made to submit a well-documented case for an investment in employee development.</p>
<ul style="list-style-type: none"> Reduced friction among the program and service units of the Bureau, and an end to perceptions among tribes that some central service units are unresponsive 	<p>Customer service, both between the program and service units and the Tribes, is an area for continuous improvement.</p>
<ul style="list-style-type: none"> Performance measures consistent with GPRA that allow the Assistant Secretary to hold program directors accountable for their performance as managers of the services and resources allocated to them 	<p>Indian Affairs has an active program performance management process that is consistent with GPRA. Communication with Indian Affairs leadership about program performance results could be strengthened.</p>
<ul style="list-style-type: none"> Clear policies and guidelines for employees to follow in the performance of their respective trust, program delivery, and oversight responsibility through current on-line manuals 	<p>Employees have performance work plans and are evaluated annually.</p> <p>Both the Indian Affairs Manual and the BIA Manual are posted on the intranet.</p>
<ul style="list-style-type: none"> Mechanisms for a far better coordinated Indian Policy that involves all relevant U.S. government agencies 	<p>This is a policy recommendation that is not part of the scope of this assessment.</p>
<ul style="list-style-type: none"> Increased confidence among the tribes that 	<p>This is a policy recommendation that is not part of the</p>

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<p align="center">NAPA Recommendations – Managing for Results (Recommended Benchmarks)</p>	<p align="center">BRONNER Assessment in 2011</p>
<p>moving to self-determination and self-governance will not result in the neglect of federal responsibilities, an indicator of which may be the number of tribes electing to operate under compacts</p>	<p>scope of this assessment.</p>

In conclusion, Bronner’s evaluation finds that the complete centralization of support functions, while addressing some issues contained in the 1999 NAPA report, created a new and different set of organizational challenges within Indian Affairs. Centralized support service, despite the diligent efforts of support function managers and employees, is not structured in a fashion that facilitates or encourages collaboration with BIA and BIE field sites. The support function structure does not aid the efforts of support function employees and managers, most of which have frequently resigned to transactional relationships with their BIA and BIE counterparts.

Appendix C: Proactive Budget Activities Over Three Fiscal Years

Activity Quarter	FY 2013 Budget Activities	FY 2014 Budget Activities	FY 2015 Budget Activities
FY 12 Q1 October-December 2011	<ul style="list-style-type: none"> • Perform lessons learned on prior fiscal year budget submission process. • Identify areas for improvement and initiate process change management. • Evaluate Office of Management and Budget (OMB) passback outcomes and prepare appeals via the Office of Policy, Management and Budget (PMB), if applicable. • Prepare final budget for Green Book. 	<ul style="list-style-type: none"> • Conduct internal program evaluations for funding realignments. • Review and update budget process training documentation. • Evaluate executive management budget goals. • Conduct program awareness briefings for Indian Affairs budget staff. • Initiate budget forecasting exercise with Program Offices. 	
FY 12 Q2 January-March 2012	<ul style="list-style-type: none"> • Implement outcomes of process change management planning. • Prepare for Congressional testimony. 	<ul style="list-style-type: none"> • Conduct budget process trainings. • Conduct pre-guidance distribution briefings with Program Offices and Tribal Interior Budget Council (TIBC). • Evaluate budget instructions from PMB. • Develop draft guidance templates. • Distribute guidance templates to Program Offices and TIBC. • Consult with TIBC on budget input. 	
FY 12 Q3 April-June 2012	<ul style="list-style-type: none"> • Prepare and deliver Congressional testimony. 	<ul style="list-style-type: none"> • Receive Program Office submissions. • Evaluate submissions from Program Offices and TIBC. • Conduct internal budget review/decision process. • Submit final budget to PMB through the Assistant Secretary. 	

Appendix C: Proactive Budget Activities Over Three Fiscal Years

Activity Quarter	FY 2013 Budget Activities	FY 2014 Budget Activities	FY 2015 Budget Activities
FY 12 Q4 July - September 2012	<ul style="list-style-type: none"> • Provide responses to Congressional inquiries. 	<ul style="list-style-type: none"> • Coordinate with PMB on budget modifications. • Coordinate with PMB on budget submission to OMB. • Conduct post-submission briefings with Program Offices. 	
FY 13 Q1 October-December 2012	<ul style="list-style-type: none"> • Perform apportionment, allotment and sub-allotment activities and begin programmatic activities (provided enactment of the fiscal year appropriation). 	<ul style="list-style-type: none"> • Perform lessons learned on prior fiscal year budget submission process. • Identify areas for improvement and initiate process change management. • Evaluate OMB passback outcomes and prepare appeals via PMB, if applicable. • Prepare final budget for Green Book. 	<ul style="list-style-type: none"> • Conduct internal program evaluations for funding realignments. • Review and update budget process training documentation. • Evaluate executive management budget goals. • Conduct program awareness briefings for Indian Affairs budget staff. • Initiate budget forecasting exercise with Program Offices.
FY 13 Q2 January-March 2013	<ul style="list-style-type: none"> • Coordinate with PMB on preparing and submitting supplemental funds requests as necessary. 	<ul style="list-style-type: none"> • Implement outcomes of process change management planning. • Prepare for Congressional testimony. 	<ul style="list-style-type: none"> • Conduct budget process trainings. • Conduct pre-guidance distribution briefings with Program Offices and TIBC. • Evaluate budget instructions from PMB. • Develop draft guidance templates. • Distribute guidance templates to Program Offices and TIBC. • Consult with TIBC on budget input.

Appendix C: Proactive Budget Activities Over Three Fiscal Years

Activity Quarter	FY 2013 Budget Activities	FY 2014 Budget Activities	FY 2015 Budget Activities
FY 13 Q3 April-June 2013		<ul style="list-style-type: none"> • Prepare and deliver Congressional testimony. 	<ul style="list-style-type: none"> • Receive Program Office submissions. • Evaluate submissions from Program Offices and TIBC. • Conduct internal budget review/decision process. • Submit final budget to PMB through the Assistant Secretary.
FY 13 Q4 July-September 2013		<ul style="list-style-type: none"> • Provide responses to Congressional inquiries. 	<ul style="list-style-type: none"> • Coordinate with PMB on budget modifications. • Coordinate with PMB on Budget submission to OMB. • Conduct post-submission briefings with Program Offices.

Appendix D: Human Capital – BIA HR Specialists Positions

Positions/Actions Needed	Total FTE required	Series Number	Grade-Level	Location	Avg Salary/w Benefits 25%	TOTAL COST FOR FTE REQUIREMENT FOR FULL YR FTE	HALF FTE	TOTAL COST
Human Resources Specialist (Classification/Recruitment & Placement)	1	0201	12	Juneau, AK	\$99,443.00	\$99,443.00		\$99,443.00
Human Resources Specialist (Classification/Recruitment & Placement)	1	0201	12	Nashville, TN	\$97,479.00	\$97,479.00		\$97,479.00
Human Resources Specialist (Classification/Recruitment & Placement)	1.5	0201	12	Muskogee, OK	\$97,479.00	\$97,479.00	\$48,739.50	\$146,218.50
Human Resources Specialist (Classification/Recruitment & Placement)	4.5	0201	12	Aberdeen, SD	\$97,479.00	\$ 389,916.00	\$48,739.50	\$438,655.50
Human Resources Specialist (Classification/Recruitment & Placement)	1.5	0201	12	Ft. Snelling, MN	\$103,285.00	\$103,285.00	\$51,642.50	\$154,927.50
Human Resources Specialist (Classification/Recruitment & Placement)	4	0201	12	Gallup, NM	\$97,479.00	\$ 389,916.00		\$ 389,916.00
Human Resources Specialist (Classification/Recruitment & Placement)	3.5	0201	12	Portland, OR	\$97,479.00	\$292,437.00	\$48,739.50	\$ 341,176.50
Human Resources Specialist (Classification/Recruitment & Placement)	1	0201	12	Sacramento, CA	\$104,344.00	\$104,344.00		\$104,344.00
Human Resources Specialist (Classification/Recruitment & Placement)	5	0201	12	Billings, MT	\$103,213.00	\$ 516,065.00		\$516,065.00
Human Resources Specialist (Classification/Recruitment & Placement)	2	0201	12	Anadarko, OK	\$94,090.00	\$188,180.00		\$188,180.00
Human Resources Specialist (Classification/Recruitment & Placement)	4	0201	12	Albuquerque, NM	\$ 95,886.00	\$ 383,544.00		\$ 383,544.00
Human Resources Specialist (Classification/Recruitment & Placement)	6.5	0201	12	Phoenix, AZ	\$99,699.00	\$598,194.00	\$49,849.50	\$648,043.50
TOTAL	35.5							\$3,507,992.50

Appendix E: Human Capital – Labor Relations Positions for BIA and BIE

Positions/Actions Needed	Total FTE required	Series Number	Grade-Level	Location	Avg Salary/w Benefits 25%	TOTAL COST FOR FTE REQUIREMENT FOR FULL YR FTE	TOTAL COST
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Juneau, AK	\$99,443.00	\$ 99,443.00	\$ 99,443.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Nashville, TN	\$97,479.00	\$ 97,479.00	\$97,479.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Muskogee, OK	\$ 97,479.00	\$97,479.00	\$ 97,479.00
Human Resources Specialist (Employee & Labor Relations)	2	0201	12	Aberdeen, SD	\$97,479.00	\$ 194,958.00	\$194,958.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Ft. Snelling, MN	\$103,285.00	\$ 103,285.00	\$ 103,285.00
Human Resources Specialist (Employee & Labor Relations)	2	0201	12	Gallup, NM	\$ 97,479.00	\$ 194,958.00	\$ 194,958.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Portland, OR	\$ 97,479.00	\$ 97,479.00	\$ 97,479.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Sacramento, CA	\$104,344.00	\$ 104,344.00	\$ 104,344.00
Human Resources Specialist (Employee & Labor Relations)	2	0201	12	Billings, MT	\$103,213.00	\$ 206,426.00	\$ 206,426.00
Human Resources Specialist (Employee & Labor Relations)	1	0201	12	Anadarko, OK	\$94,090.00	\$94,090.00	\$ 94,090.00
Human Resources Specialist (Employee & Labor Relations)	2	0201	12	Albuquerque, NM	\$ 95,886.00	\$ 191,772.00	\$ 191,772.00
Human Resources Specialist (Employee & Labor Relations)	3	0201	12	Phoenix, AZ	\$ 99,699.00	\$299,097.00	\$299,097.00
TOTAL	18						\$1,780,810.00

Appendix F: Human Capital – Training and Development Positions

Positions/Actions Needed	Total FTE required	Series Number	Grade-Level	Location	Avg Salary/w Benefits 25%	TOTAL COST FOR FTE REQUIREMENT FOR FULL YR FTE	TOTAL COST
Director of Employee Development	1	0200	15	Washington, DC	\$ 180,368.00	\$180,368.00	\$ 180,368.00
Deputy Director for Employee Development	1	0200	14	Washington, DC	\$ 150,507.97	\$150,507.97	\$150,507.97
Program Manager	3	0243	13	Washington, DC	\$ 124,297.38	\$372,892.14	\$372,892.14
Administrative Assistant	1	0318	7	Washington, DC	\$ 55,400.00	\$55,400.00	\$55,400.00
TOTAL	6						\$759,168.11

Appendix G: EEO Positions (does not include training collateral duty EEO counselors):

Positions/Actions Needed	Total FTE required	Series Number	Grade-Level	Location	Avg Salary/w Benefits 25%	TOTAL COST FOR FTE REQUIREMENT FOR FULL YR FTE	Total Cost
EEO Officer	1	0260	15	Washington, DC	\$171,886.25	\$ 171,886.25	\$ 171,886.25
EEO Specialist	4	0360	13	Washington, DC	\$129,839.00	\$ 519,356.00	\$ 519,356.00
Equal Opportunity Aide	1	0361	7/8/9	Washington, DC	\$ 73,139.00	\$ 73,139.00	\$ 73,139.00
EEO Counselor	2	0360	13	Washington, DC	\$129,839.00	\$ 259,678.00	\$ 259,678.00
Employee Training and a Contract for EEO Investigators						\$ 1,975,940.75	\$ 1,975,940.75
TOTAL							\$3,000,000.00

Appendix I: Communications – Internal Communications Position

Positions/Actions Needed	Total FTE required	Series Number	Grade-Level	Location	Avg Salary/w Benefits 25%	TOTAL COST FOR FTE REQUIREMENT FOR FULL YR FTE	Total Cost
Internal Communications Specialist	1	1035	13/14	Washington, DC	\$146,918.65	\$146,918.65	\$146,918.65