
Trust Management Improvement Project

Quarterly Status Report to the Court Number Four

For the Period
August 1, 2000 to October 31, 2000



November 30, 2000

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Introduction

The Court's Order. In the matter of *Cobell v. Babbitt*, the United States District Court for the District of Columbia on December 21, 1999, ordered the Department of the Interior ("DOI" or "Department") to submit quarterly reports on actions taken to correct problems identified by the Court that relate to the Federal government's statutory trust responsibility to individual Indians.

Quarterly Status Report Format. This is the fourth status report submitted pursuant to the Court's Order. This report documents improvements to two major subject areas: 1) actions and changes pertaining to the February 29, 2000, Revised and Updated High Level Implementation Plan (HLIP) that have occurred since the end of the reporting period of the *Third Quarterly Report*, and 2) steps taken by the DOI to rectify Court-declared breaches of trust.

The *Fourth Quarterly Report* covers the reporting period of August 1, 2000, through October 31, 2000. This report is identical in format to the *Third Quarterly Report* and is organized to follow the order of the HLIP, that is, subproject by subproject. Information on the ten active HLIP subprojects is followed by information on each of the four projects that address areas identified by the Court as breaches of the trust responsibility. Each chapter contains an outline of the problem the subproject addresses (as stated in the HLIP), action taken to complete the specific milestones due during the reporting period, information on significant ongoing activities, and an updated Milestone Chart indicating the current status of all project milestones.

For context and ease of reference, the Milestone Chart for each subproject immediately follows the discussion of each subproject. Milestones that are scheduled to be completed or have had changes made during this reporting period are shaded in the Milestone Chart. As established previously, the Records Retention breach report appears under the HLIP Records Management Chapter, with an appropriate cross-reference.

Fourth Quarterly Report Highlights. The progress on the High Level Implementation Plan subprojects is well documented later in this report. Some of the highlights, including non-HLIP related events, occurring in this reporting cycle are:

- 👉 Secretarial Order 3215, "Principles for the Discharge of the Secretary's Trust Responsibility," dated April 28, 2000 and reported in the *Second Quarterly Report* was made permanent by its inclusion in the Departmental Manual on October 31, 2000.
- 👉 On September 15, 2000, the General Accounting Office (GAO) released a report, *Indian Trust Funds: Improvements Made in Acquisition of New Asset and Accounting System But Significant Risks Remain* (GAO/AIMD-00-259), an update of previous reports that described the Department's efforts in developing TAAMS. The Department has, in general, agreed with the GAO's overall assessment of the significant progress Interior has made and the continuing challenges to be faced during the remainder of this initiative.
- 👉 Due to the approximate 62% success rate of identifying possible addresses for account holders through the Trans Union Credit Bureau database, the Office of Trust Funds Management (OTFM) will begin utilizing another Trans Union product called Data Trails. This additional product may increase OTFM's success rate in researching the "whereabouts unknown" IIM account holders.

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- ☞ While not a part of the HLIP, on October 23, 2000, Congress passed an important piece of legislation, which will aid the Department's trust reform activities. On November 7, 2000, the President signed Public Law 106-462, the "Indian Land Consolidation Act Amendments of 2000". This legislation will help reduce the administrative and financial burden arising from the fractionated ownership of Indian lands.
- ☞ The Bureau of Indian Affairs (BIA) appraisal backlog in the Rocky Mountain Region was eliminated.
- ☞ The Office of Hearings and Appeals (OHA) has opened four new field offices in Billings, MT, Bismarck, ND, Rapid City, SD, and Phoenix, AZ, and has increased the staff of the OHA Sacramento, CA field office. These staff additions will help reduce the time required to process the probate backlog and caseload.
- ☞ The Department has initiated steps to appoint a career employee from the Department's Solicitor's Office as Director, Office of Hearings and Appeals.
- ☞ The Office of Trust Risk Management was formally established within the Office of the Special Trustee, by its inclusion in the Departmental Manual on September 29, 2000. In that same Departmental Manual release, the name of the Office of Trust Litigation Support and Records was simplified to the Office of Trust Records.

The Revised High Level Implementation Plan. The revised HLIP, as amended by the Quarterly Status Reports, contains some 254 milestones directed towards accomplishment of trust improvement projects. As of October 31, 2000, a cumulative total of 168 milestones have been completed, including 17 milestones completed during this reporting period.

Fifteen milestones were not completed by the scheduled date during this reporting period. A full description of the impact and reasons for the missed dates is detailed in the applicable HLIP subproject chapter. This report also addresses activity occurring on a number of other significant ongoing milestones.

Fourth Quarterly Report HLIP Milestones Due Status			
HLIP Project	Due	Met	Not Met
1. OST Data Cleanup	3	1	2
2. BIA Data Cleanup	0		
3. Probate	5	4	1 (1)
4. BIA Appraisals	5	1	4 (2)
6. TAAMS	3		3
7. MMS Reengineering	3	2	1 (3)
8. Records Management	0		
9. Trust Policies and Procedures	6	3	3 (4)
10. Training	3	2	1
11. Internal Controls	4	4	
HLIP Project Total	32	17	15

(1) The Probate Backlog's missed milestone was for the establishment of an OHA/BIA implementation team. The project directors identified six staff and have filled five of the positions. The recruitment process was re-initiated when a job offer for the sixth position was declined.

(2) As outlined in the HLIP, two BIA Appraisal milestones are dependent on the completion of the TAAMS appraisal module. Systems requirements for the Appraisal Management System and the Comp Database System were identified and provided to the TAAMS project office as scheduled. Due to delays in the TAAMS modification schedule, however, TAAMS project management was unable to accommodate the enhanced appraisal needs within the timeframe originally projected, resulting in two milestones being missed.

One of the additional missed milestones for the BIA Appraisal project was actually completed three weeks late. That milestone concerned the elimination of the backlog at the Rocky Mountain Region and the delay does not impact other milestones. Another missed milestone, to Upgrade the Bureaus' Automated Systems, is near completion at this writing. The acquisition of desktop computers was delayed due to problems with the original contractor. A new contract has been issued for the purchase of this computer equipment.

(3) The missed milestone for the Minerals Management Service (MMS) Reengineering project to complete the Detailed Application design for the new financial system, has now been completed. The milestone was actually completed two weeks after the scheduled date and will not impact future milestones.

(4) The Policies and Procedures subproject missed three scheduled milestones, two of which were completed after the deadline. The Office of the Special Trustee was two months late with its submission of its analysis of Departmental functions relating to trust resources, and the Bureau of Reclamation was three weeks late with its submission. Neither of these missed milestones will have a significant impact on the remaining milestones. The other missed milestone was due to the Office of Surface Mining not submitting its analysis by the October 31, 2000 milestone date.

Court-Identified Breach Projects. The Department of the Interior's February 2000 plans to address Court-identified breaches of statutory trust duties under the *American Indian Trust Fund Management Reform Act of 1994* include a total of 80 milestone tasks, of which a cumulative total of 44 have been completed by the end of the reporting period. This figure includes five milestones that were completed during this reporting period.

Two milestones were not completed on the scheduled date during this reporting period. A full description of the impact and reasons for the missed dates is detailed in the applicable Breach project.

Fourth Quarterly Report Breach Milestones Due Status			
Breach Project	Due	Met	Not Met
1. Collection of Missing Information	5	3	2
3. Computer Architecture	1	1	
4. Workforce Planning	1	1	
Breaches Total	7	5	2

Changes and Corrections to the HLIP. There are several changes to Milestone Charts throughout this report. These changes reflect milestone additions and corrected and revised completion dates, both for missed milestones and future milestones based on a current evaluation of the milestone progress. *The Special Trustee has approved the milestone changes, which are more fully discussed in the relevant chapters.*

Special Trustee Observations

The Department, through the oversight of the Special Trustee, is reinforcing the efforts underway to ensure that the Department fully meets its trust responsibilities and its commitments to the Court. Accordingly, funding allocation decisions continue to be based on well-developed project plans and metrics.

The Special Trustee offers the following observations on certain critical projects and aspects of the trust improvement plans for this Fourth Quarterly Report.

General Observations

- ✓ Increasingly, milestone completions are affected by the interdependency of some subprojects, i.e., progress on one project is being slowed by the difficulties of another. One example of this interdependence is that of the TAAMS and Appraisals Subprojects.
- ✓ Some projects may require the inclusion of additional milestones in order to better track task progress and establish task conclusions. These milestones will be assessed so task performance can be measured.
- ✓ There is a growing sense that it is becoming more difficult to attract and retain highly qualified and motivated staff to work on trust reform. In addition to the increasing demand and contention for existing staff to perform additional actions and functions related to the ongoing *Cobell* litigation and HLIP projects, DOI staff appear less interested in working on trust reform due to the perceived threat of personal liability and risk ensuing from the *Cobell* litigation. This has been OST's experience in hiring for the Records Management subproject. Another factor has been the short-term nature of the employment offered (rather than permanent), which has been a problem in attracting qualified staff for the Probate Subproject. In response, some of the Probate Subproject positions have been restructured as permanent employment opportunities.
- ✓ The available time of senior managers in OST, BIA and others in DOI involved with trust reform efforts is adversely impacted by the requirement to deal with *Cobell*-related litigation.
- ✓ BIA and OST continue to make progress in creating a Procedural Handbook providing a compilation of business rules and practices. These would be integrated into TAAMS and TFAS.

Specific Observations

Trust Records

- ✓ A trust records issue will need to be resolved soon. Records relating to IIM beneficiaries are federal property. As previously reported, the Department intends to ensure that such records are stored safely and securely at the OST centralized records centers in Albuquerque. It will also enable OST and BIA to perform their duties relating to the records more efficiently and more effectively from a cost standpoint. Most of the records have been moved to the storage center; there remains, however, three Tribes that have refused to permit such files to be removed to a records center. Previously, we have reported that the Department is attempting to resolve this issue with these Tribes. DOI will continue to try to resolve this issue. If, however, the Department is unsuccessful in achieving a resolution, we will advise the Special Master by January 12, 2001.

BIA Data Cleanup

- ✓ BIA Data Cleanup will remain a difficult challenge from both a time and logistical perspective. An important component of the data cleanup exercise is establishing metrics that indicate improvements in the data quality. BIA management is working with the data cleanup contractor to establish more precise indicators of progress and has set completion dates (see Chapter 2, BIA Data Cleanup).

Systems Interfaces

- ✓ Interfaces between the TAAMS, MMS and TFAS systems have now been programmed, and are undergoing iterations of testing to confirm suitable data linkage, replication and processing.

TAAMS

- ✓ Additional TAAMS milestones are needed. It is expected that a systems project of this magnitude and complexity will establish a significant number of milestones, some of which may need some rescheduling. However, the progressive, or stepping stone, nature of this project is difficult to track and more detailed benchmarks or milestones are required to hold line managers accountable to the BIA Chief Information Officer and senior BIA officials.
- ✓ It is time for a decision by BIA Central Office senior management to establish the TAAMS-Title Portion as the system of record in the Rocky Mountain Region. The same decision relating to the Alaska and Southern Plains Regions must be considered as soon as data is ready to support operations.

Youpee Backlog (Probate Subproject)

- ✓ More complete Youpee backlog elimination plans and milestones are required to demonstrate how the Youpee probate backlog will be addressed. These plans will be based, in part, on the economic analysis of the recently completed Pawnee Agency Pilot on Youpee probates.

Status of Prior Special Trustee Observations

Below are some of the observations made by the Special Trustee in the Third Quarterly Report that are not addressed in the above narrative. Following the italicized text of the previous observation is a comment on the follow-up progress.

Probate Backlog

- ✓ *Solving the Probate Backlog has been a serious and complex management problem and remains so. The BIA and OST will work together to ensure the BIA's detailed work plan is adequate to resolve the Probate Backlog. An important first step was accomplished in the hiring of BIA Attorney Decision Makers to work on probate at the field level.*

There has been limited progress on ensuring that the BIA work plan is adequate to resolve the Probate Backlog. OST is assisting BIA in developing a more detailed statement of work and work plan for the case processing, posting and recording probate backlogs.

BIA Appraisals Policy

- ✓ *The Special Trustee is concerned that the independence and integrity of the BIA appraisal staff be established in accord with the Uniform Standards of Professional Appraisal Practice.*

The Special Trustee supports the division of responsibility between realty officers and appraisers to avoid any real or apparent conflict of interest.

Metrics for BIA Data Cleanup

- ✓ *The Special Trustee will also work with the BIA subproject manager to obtain meaningful metrics on the progress of the BIA data cleanup effort.*

BIA's Chief Information Officer and OST have determined a format for charting the cleanup process in each region. That information will appear in a chart that will be refined for use in the next quarterly report, and will provide observers a more useful monitoring tool.

High Level Implementation Plan: Activity Reports

1. **OST DATA CLEANUP**

I. **Statement of the Problem:**

Documentation and supporting data in the Individual Indian Monies (IIM) module of the BIA's Information Resources Management System and IIM file jacket folders were not maintained consistently throughout BIA and OTFM field offices.

Numerous deficiencies existed in the data because of inconsistent application of any "standard" method of data input, account/data review, or standardized use of Tribal Codes, Alpha Codes or Management Codes.

II. **Summary of Milestones Due this Quarter:**

P4. Revise Management Coding (Plan Development). *The milestone completion date of September 30, 2000, was not met. The new date for the completion of this milestone is December 31, 2000.* A draft plan was completed on the "Revised Management Coding" project which will establish metrics for the cleanup of code discrepancies and outline progress made to date on this effort. The plan outlines the ongoing coordination that will exist between OST and BIA to revise and utilize the management codes. Cleanup has been occurring, however, a formal plan has not been finalized.

P5. Continue Research/Resolving Whereabouts Unknown Accounts. *This milestone was scheduled to be evaluated by September 30, 2000. This milestone was met.* OTFM has determined that it will continue the current approach toward resolving whereabouts unknown accounts. Future progress on this milestone will be reported as an ongoing task. Due to the approximate 62% success rate of identifying possible addresses for account holders through the Trans Union Credit Bureau database, OTFM will begin utilizing another Trans Union product called Data Trails to further resolve the whereabouts unknown accounts. Data Trails can be used to search phone directories, sweepstakes databases, voter registration databases, motor vehicle databases and warranty card submissions for IIM account holder address information from a database of over 130 million records.

OTFM provided 2,056 names and social security numbers and/or last known addresses from the Southern Plains Region to Trans Union for a total of 8,713 names submitted since the initiation of this project. The company matched 1,692 account names and social security numbers from its database, for a total of 5,419 matches to date, achieving a 62% rate of identifying possible addresses. Letters requesting confirmation of account holder's identities have been sent to these individuals. This quarter, 586 responses from account holders have generated account and address updates to TFAS for a total of 1,163 updates to date, a 21.5% success rate. It should be noted that while 5,419 letters have been mailed to account holders, responses have been received at a much slower rate.

P6. Resolve Special Deposit Accounts (Plan Development). *This milestone, scheduled to be completed by September 30, 2000, was not met. The new date for the completion of this milestone is January 31, 2001.* A draft Special Deposit Accounts plan was completed in conjunction with the Bureau of Indian Affairs, however, the necessary coordination between BIA and OST to complete the final plan did not occur. According to the plan, a special deposit account pilot project will be initiated. The pilot will assist in recommending the scope of special deposit accounts to be reviewed and will allow for the process to clean up these accounts to be reviewed for efficiency and effectiveness. Special deposit accounts are expected to be cleaned up on a region-by-region basis.

III. Summary of Ongoing Activities:

M. Oversee Contractor's Efforts and Report on Progress. The DataCom contract reports are generated so that OTFM may monitor progress on cleanup activities. Currently, OTFM is overseeing progress on post-conversion efforts as outlined in the discussion of Milestone "P" below. OTFM had weekly meetings with the contractor during this reporting period, and progress was determined to be satisfactory.

N. Resolve Jacket Folder Retention/Production Issue with Tribes. No progress toward release of the IIM file jackets has been realized. DOI will continue to try to resolve this issue. If this effort is unsuccessful, we will advise the Special Master.

P. Identify, Report On, Organize and Initiate Follow-on Post-Conversion Cleanup Efforts. OTFM continues to work on post-conversion cleanup issues. The final TFAS conversion occurred on March 31, 2000. The following TFAS post-conversion activities occurred during this quarter:

- Of 1,282 accounts in regions other than the home agency, 693 accounts have been investigated and corrected (1,016 total corrections to date). OTFM is awaiting documentation from BIA and OTFM field staff to correct the remaining 266 accounts.
- Of 1,334 accounts that do not conform to OTFM policy, 866 have been investigated and corrected (1,174 corrected accounts to date). OTFM is awaiting documentation from BIA and OTFM field staff to correct the remaining 160 accounts.
- Of 4,830 accounts with alpha codes or account categories that did not follow policy, 4,751 have been investigated and corrected. These corrections, combined with the 79 corrections already made, complete this task.
- Of 262,000 Account Name Alphabetic Sort Characters that required review and/or correction, 212,000 have been reviewed and/or corrected. These corrections, combined with the 50,000 corrections already made, complete this task.

P3. Locate Missing Documents. Letters were sent to 472 "unrestricted" account holders who had cumulative disbursements exceeding \$5,000 over a 12-month period (unrestricted accounts are those IIM accounts in which an individual Indian may determine the timing and amount of disbursements from the account, as established in

25 CFR 115). To date, a total of 358 accounts have been updated (76% of the 472 accounts identified).

IV. Changes/Corrections to the HLIP or Previous Quarterly Reports:

P4. Revise Management Coding (Plan Development). A new date for the completion of this milestone is December 31, 2000.

P5. Continue Research/Resolving Whereabouts Unknown Accounts. This task had an evaluation point at September 30, 2000. Because current research efforts have been productive, the present strategy will continue and this milestone will be reported as ongoing in future reports.

P6. Resolve Special Deposit Accounts (Plan Development). The new date for the completion of this milestone is January 31, 2001.

**V. OST Data Cleanup Subproject
Subproject Manager: Doug Lords, OST**

<u>Milestone</u>	<u>Schedule</u>
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded	
A. Establish Project Charter	11/30/96 Completed
B. Organize Project and Temporary Staff to Conduct Records Cleanup Pilot.....	12/31/96 Completed
C. Select and Cleanup a Test Agency.....	03/31/97 Completed
D. Select Additional Test Site and Cleanup Records	06/30/97 Completed
E. Develop and Refine Cleanup Processes	06/30/97 Completed
F. Acquire Contractor to Perform Cleanup of Administrative Records in 18 Months	08/27/97 Completed
G. Select Pilot Site - BIA's Western Region (Phoenix Area)	11/13/97 Completed
H. Task Contractor for Methods Study, Planning, and Production Gear-up	12/31/97 Completed
I. Task Contractor to Initiate, Conduct and Complete Cleanup	01/05/98 Completed
J. Gather Western Region Trust Records Centrally in Albuquerque	02/03/98 Completed
K. Finish Cleanup of Western Region Administrative Trust Records.....	03/29/98 Completed
L. Continue Gathering IIM Administrative Trust Jacket Folders and Trust Records from Other Areas	03/29/00 Completed
M. Oversee Contractor's Efforts and Report on Progress	Ongoing
N. Resolve Jacket Folder Retention/Production Issue with Tribes	Ongoing
O. Complete IIM Jacket Folder Cleanup.....	09/30/99 Completed
P. Identify, Report on, Organize and Initiate Follow-on Post Conversion Cleanup Efforts:	
P1. Eliminate Duplicate Accounts	03/31/00 Completed
P2. Transfer Tribal IIM Accounts	03/31/00 Completed
P3. Locate Missing Documents.....	Ongoing
P4. Revise Management Coding (Plan Development)	09/30/00 Revised to 12/31/00
P5. Continue Research/Resolving Whereabouts Unknown Accounts (Eval. Pt)	09/30/00 Completed/ Ongoing
P6. Resolve Special Deposit Accounts (Plan Development).....	09/30/00 Revised to 01/31/01
P7. Settle Issues with Small Balance/Inactive Accounts	Ongoing
P8. Resolve Accounting Discrepancies	Ongoing

2. BIA DATA CLEANUP AND MANAGEMENT

I. Statement of Problem:

The BIA is implementing a new Trust Asset and Accounting Management System throughout all regions, agencies and participating tribal offices. The data found in the legacy systems varies considerably in terms of quality, completeness and timeliness. Some offices use the current systems regularly, others use them rarely, and still others have redefined the legacy systems to fit their own needs.

The scope of the BIA data cleanup effort is extensive. At present, the BIA is managing an estimated 170,000 tracts of land encompassing:

- 56 million acres
- 350,000 Indian owners
- 2 million owner interests
- 100,000 active leases

Some historical records date back to the original allotment period in the 1880's.

II. Summary of Milestones Due This Quarter:

No milestones were due this quarter.

III. Summary of Ongoing Activities:

A variety of different data cleanup activities are occurring throughout the BIA Regions. A description of the various pre-deployment and post-deployment data cleanup efforts can be found in Appendix A. At present, the emphasis is on land title records and the elimination of data anomalies affecting data migration. Particular emphasis is being given to multiple owner, fee-owner/non-Indian identification, and non-enrolled identification number verification, as well as "metes and bounds".

Data cleanup continued at ten BIA Regional Offices and 18 agencies during the reporting period. Data cleanup personnel totaled 188 as of October 31, 2000. As the extent of the data cleanup challenge grows more clear, the TAAMS project management team continues to modify its data cleanup approach to ensure the most effective approach possible.

DataCom Sciences recently completed the first TAAMS Information Migration Evaluation (TIME) for the Rocky Mountain Region. Some 93 tracts were studied from the Lands Record Information System (LRIS), consisting of 541 documents that comprised 11 different types of actions. The legacy data was compared with the actual paper records to determine accuracy. TIME found that of the 541 documents studied, 33.4 percent had at least one error – the majority being previous data entry errors on the part of BIA staff, as opposed to missing data. Of the total number of mandatory fields on all of the 541 documents (13,688 fields), 1,900 errors were discovered for an error rate of 13.88 percent. An additional 88 documents had errors in non-mandatory fields. The TIME analysis will now be conducted at other regional sites beginning in December 2000.

The result of this analysis gives the BIA a better understanding of the data cleanup challenge that exists in its regional offices, and provides a benchmark for determining the success of data cleanup efforts and continued data management efforts to maintain data integrity.

Consistent with the new TAAMS deployment approach (see discussion in Chapter 6, TAAMS, Summary of Ongoing Activities), DataCom will concentrate its data cleanup efforts to correspond with the TAAMS deployment schedules for Groups A, B and C. Group A consists of the Rocky Mountain, Southern Plains, Alaska and Eastern Oklahoma Regions, Group B is the Northwest, Southwest, Western and Navajo Regions, and Group C is the Pacific, Great Plains, Midwest and Eastern Regions. No ongoing data cleanup activities are being curtailed, but all new activities will be focused on Group A sites.

Additionally, the BIA and DataCom are looking at redefining the manner in which the actual data cleanup is being carried out. The extent of the data cleanup need in some regions will be far more extensive and a different method will need to be developed to ensure that data cleanup is completed in a comprehensive manner. For example, data cleanup by tract is being considered in those areas where data cleanup activities are more extensive.

DataCom continued to focus on obtaining realty information for assessment preparation. DataCom personnel received six *TAAMS Data Cleanup and Conversion Assessment Questionnaires* during October, bringing the total number of responses to 96 as of October 23, 2000 (60% response rate for Tribal and BIA offices; 74% response rate for BIA offices exclusively). Ten regional reports were delivered to BIA officials during October, while work continues on the individual realty office reports. The reports received indicate that very few regions will be eligible for conversion from existing legacy systems. The majority of leasing activities are carried out using personal computer software or manually - these methods are not conducive to a data migration effort.

DataCom has presented an alternative method for data cleanup which will require direct data entry for all existing leases, contracts, and agreements for any region where legacy data is not readily available for migration. Further decisions on this effort will be made after the TAAMS lease module is completed and operational in the Rocky Mountain Region.

BIA has provided the following schedule of activities and dates planned for the coming months:

- December 11, 2000 – initiate TIME in the Southern Plains Region
- February 5, 2001 – initiate TIME in the Northwest Region
- February 23, 2001 – complete land title and records data cleanup in the Rocky Mountain Region

F. Training on Data Cleanup and Data Quality Policies and Procedures.

Training will continue at each site for new data cleanup contractor personnel until the data cleanup project is complete.

G. Perform Pre-Deployment Data Cleanup. Pre-deployment data cleanup activities are occurring in all Regional Office jurisdictions, with the exception of the Eastern Oklahoma Regional Office, where title information is retained by the county. At present, and in conjunction with TAAMS deployment, the data cleanup emphasis is on the data utilized at the Land Title and Records Offices (LTROs). Cleanup has focused primarily on eliminating data anomalies that impact on data migration activities.

Data Cleanup Overview by Region:

Rocky Mountain Region Cleanup Status – Summary

- Multiple Owner ID Task (for IRMS) is 56% complete (1,961 cases).
- Multiple Owner ID Task (for LRIS) is 99% complete.
- Fee Owner ID Task was completed by DataCom on August 10, 2000 (723 cases). However, data cleanup personnel, under direction of the LTRO Manager, will be re-entering ownership documents that were not previously captured in TAAMS.
- Title Tract Match Task was completed on September 22, 2000. This task involved the verification of 477 legal descriptions between LRIS and IRMS.
- IIM Match Task: 298 of the 789 anomalies have been identified. This involves the verification of ownership information between IIM and IRMS.
- TAAMS Information Migration Evaluation (TIME) Project: Scanned 8,763 pages of documents for the TAAMS derived Tract 100 and document-based sample.
- Metes and Bounds Task: Document acquisition portion is 100% complete, BIA personnel will complete scanning documents into TAAMS.
- Lease Owner Inquiry: At the Ft. Peck Agency, 85% (717 cases) of the identified cases have been completed.
- Tract allotment files at the Ft. Peck and Ft. Belknap Agencies are being updated, as are lease files at the Crow Agency.

Alaska Region Cleanup Status – Summary

Juneau personnel continued their focus on title examination and encoding into TAAMS.

- Cook Inlet is 84% complete (592 allotment documents entered).
- Koniag is 78% complete (455 allotment documents entered).
- Chugach is 32% complete (105 allotment documents entered).
- Ahtna is 29% complete (287 allotment documents entered).

Great Plains Region Cleanup Status – Summary

- Multiple Owner ID Task (Great Plains and Midwest) is 71% complete (8,535 cases). The research process is 96% complete (11,526 cases).
- Document Processing Task: 20% completed to date (2,622 of 13,000 Joint Tribal Advisory Committee deeds).
- Current Agency Global Processing Requests: 94% of requests (157) received to date have been processed.

Southwest/Western/Navajo Regions Cleanup Status – Summary

- Multiple Owner ID: 77% (721 cases) have been completed for the Southwest Region and 34% (1,046 cases) for the Navajo/Western Regions.
- Non-Enrolled ID: 270 cases have been completed for the Eastern Navajo and the Pima Agencies.

- Administrative Probate Modifications: 24 of 590 administrative probate modifications received have been completed (this is a subtask of the prior two tasks); 197 are pending BIA approval.
- BIA Assigned Administrative Probate Modification Task: 34 of the 1,048 administrative probate modifications received have been completed.
- Administrative Modification Encoding Task: 29 of 62 have been encoded.

Northwest Region (Flathead/Colville) Cleanup Status –Summary

- Multiple Owner ID Cases: Personnel at the Northwest Regional Office and Flathead Agency completed the initial research process for 100% of the cases (4,345 cases), and have completed 14% (612) of these cases to date.
- 100N Number Task: Some 42% (1,060) anomalies identified/returned from the agencies have been completed. Of the 9,861 ID verification requests sent out by the LTRO, some 7,473 remain outstanding.
- Document Processing Task: As of September, 36% (374 of 1,037 documents) were completed at the Flathead Agency. This task has been placed on hold and will resume in November due to the priority placed on the Multiple Owner ID task during October.

Pacific Region Cleanup Status –Summary

- Multiple Owner ID Cases: 65% (462) of the cases have been completed.
- Non-Enrolled ID Task: 13% of the anomalies have been completed (317 of 2,460). Some 341 agency ID verification requests for both tasks remain outstanding and 461 identification cards have been updated.
- Recordation of Documents Task for the Palm Springs Field Office: 100% (924) of the documents received have been encoded. This task was completed October 30, 2000.

Southern Plains Region Cleanup Status –Summary

- Multiple Owner ID Task: 26% (652 of 2,504 cases) of the cases identified have been completed and 139 ID cards for landholders in the region have been updated.
- Payment File Verification Task: Initiated 185 of the 2,582 anomalies identified, and have completed six anomalies to date.

Eastern Region – Summary

- Acquisition of Legal Land Documents: This task has been completed with the review and inventory of 60 boxes of documents. Some 14 of the previously identified 74 boxes were found to contain non-related realty documentation.
- Verified 1,151 microfiche documents.
- The focus at the Cherokee Agency remains the acquisition and certification of original legal documents:
 - completed document examination on 741 files from which data cleanup personnel have acquired 2,943 Land Titles and Records documents; and
 - reviewed approximately 14,715 of the estimated 30,000 records identified for data cleanup work.

H. Monitor Data Integrity for Each BIA Office - The data cleanup contractor is completing its analysis of the completeness and accuracy of the land title records data in the Rocky Mountain Region. The contractor has initiated its study of the Southern Plains Region.

K. BIA Data Management – Data management is an ongoing task that is required to be performed by each office.

IV. Corrections/Changes to the HLIP or Previous Quarterly Reports: None.

V. Milestone Chart for BIA Data Clean Up and Management Subproject
Subproject Manager: Chester Mills, BIA

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Assign BIA Data Administrator and Data Administration Team.....	08/31/98	Completed
B. Identify Data Elements, Standards, and Metrics & Ownership Issues	03/26/99	Completed
C. Perform Data Quality Analysis	12/31/98	Completed
D. Procure Data Cleanup Contractor Assistance	03/01/99	Completed
E. Develop Data Cleanup Strategy, Policies and Procedures	08/31/99	Completed
F. Train on Data Cleanup and Data Quality Policies and Procedures.....	Ongoing	
G. Perform Pre-Deployment Data Cleanup in Current Systems	06/30/00	Initiated
H. Monitor Data Integrity for Each BIA Office.....	Ongoing	
I. TAAMS Post-Deployment Cleanup.....	12/31/03	Ongoing
J. Post Data Cleanup Auditing.....	Ongoing	
K. BIA Data Management.....	Ongoing	

3. PROBATE BACKLOG

I. Statement of the Problem:

The Secretary is charged with administering trust or restricted resources and funds for the benefit of individual Indian owners. Federal law permits Indian resource owners to pass title to their trust assets by testamentary devise or by intestate succession and imposes upon the Secretary the duty of determining the legal heirs to the trust assets after the death of an Indian trust asset owner. As each generation passes, Indian heirs become owners of undivided interests in the trust and restricted assets. This multiple common ownership is referred to as fractionated heirship.

Due in large part to the great numbers of fractionated interests in trust assets, probate cases in BIA regions with high concentrations of allotted lands have become backlogged. The Indian Probate Reinvolution Laboratory found that this situation is further exacerbated by the fact that both BIA and OHA lack sufficient staff exclusively dedicated to probate case work, and that there exists no uniform agency procedures for facilitating timely processing. Caseload data, which included a projected estimate of future deaths, was that approximately 15,500 actions are pending in ten BIA regions.

The Office of Hearings and Appeals (OHA) performs the adjudication functions in which Administrative Law Judges probate Indian trust estates. The failure of OHA to remain current in probate adjudication adversely affects the accuracy of title records and the proper distribution of funds derived from trust property. OHA has approximately 4,000 pending cases including undecided cases that have been carried over from prior years and new cases received from BIA in the current year. The implementation of the reinvention lab recommendations will address the backlog of pending cases and prevent future backlogs.

II. Summary of Milestones Due this Quarter:

D. Establish OHA/BIA Implementation Team to Coordinate Implementation of Redesigned Probate Process. *This milestone, scheduled for completion by September 30, 2000, was not met. The new date for the completion of this milestone is December 31, 2000.* The BIA/OHA Probate Implementation Project Directors have identified six staff (five program analysts and a secretary) to perform the joint project team responsibilities. The project initially experienced some problems recruiting program analysts due to the term nature of the appointments and the limited duration of the project. However, the Project Directors recently received authority from the Department to extend offers of permanent employment to these staff. As a result, all offers have been made and accepted with the exception of one recent declination for a program analyst position. The position is expected to be filled by December 31, 2000.

G. Hire Additional OHA Staff and Reopen Probate Offices. *This milestone, scheduled to be completed by September 30, 2000, was met.* OHA has hired 17 new permanent staff, including two Administrative Law Judges (ALJs), 10 attorney advisors and five support staff in connection with the opening of four new field offices (Billings, MT; Bismarck, ND; Rapid City, SD; and Phoenix, AZ), and increased the staff of the OHA Sacramento, CA field office. OHA also hired four temporary probate judges. Two ALJs in the OHA St. Paul office and one judge from the Salt Lake City field office have

been reassigned to the newly created OHA Rapid City, South Dakota office, and the Sacramento office, respectively. OHA also made offers to hire seven additional support staff (i.e., paralegals and legal clerks) to staff its new field offices, but those positions have not been filled. OHA will continue to recruit to fill the paralegal and legal clerk vacancies to support its field offices. In the interim, OHA is using existing staff, as necessary, to support its field offices.

J. Identify Indian Probate Training Needs. *This milestone, scheduled to be completed by August 31, 2000, was met.* The Probate Project Directors and the HLIP Training Project Director have met to coordinate long-term probate training requirements and needs of BIA and OHA probate staff that could be incorporated into the training subproject plans.

The initial probate training focus has been on familiarizing new and existing staff with the new streamlined probate process. The Directors will continue to assess probate functional requirements and long-term training needs in the areas of cultural sensitivity, probate law and other required training for probate staff.

In August 2000, the BIA conducted a comprehensive probate process training conference for all BIA probate specialists, probate clerks and Attorney Decision Makers (ADMs). Attendees came from all the BIA Regional Offices. Each attendee received over 4 hours of training on the OHA-7 electronic form, and the ADMs and ADM clerks were trained on developing an electronic tracking system in the OHA probate operating system. A training curriculum was developed from the training session, and participants completed a training needs assessment survey for future course planning and development.

In October 2000, OHA conducted a comprehensive probate training conference for administrative law judges, probate judges, attorney decision makers, paralegals and legal clerks. As a result of this training, new staff have been provided the skills to begin hearing and deciding cases. The training also introduced the existing staff to the new streamlined adjudication process and the changes that have been made to expedite the resolution of cases. Also, staff were trained on the OHA automated operating system.

P. Initiate Customer Service Outreach. *This milestone, scheduled for completion by September 30, 2000, was met.* The Probate Implementation Project Team has coordinated with the administrator for the DOI-BIA Internet page to identify the tasks necessary to create a probate web site and begin placing reference materials on a specific probate web page so that it links to the BIA web page. The probate team is collecting documents to scan to prepare the electronic files for the web integration.

R2. Model Memorandum of Understanding. *This milestone, scheduled to be completed by September 30, 2000, was met.* A model MOU or "working agreement" between the BIA and Indian Tribes has been designed and developed to allow the BIA to access Tribal records necessary to complete the probate packages. Such access would be contingent upon approval of the Indian Tribe. The Solicitor's Office has reviewed and approved the model agreement.

III. Summary of Ongoing Activities:

A2. Elimination of Summary Distribution Backlog. The processing of the summary distribution backlog was delayed due to the time required to establish and open new ADM offices and to conduct extensive training to implement a new program. Additionally, this task was affected by the lack of full-time probate field staff to prepare probate summary distribution case files. During this reporting period, the ADMs received a total of 209 probate cases for summary distribution, consisting of 146 that were less than \$1,000, nine between \$1,000 and \$5,000, and 54 that were incomplete or unknown amounts at the time of submission. Of these 209 cases:

- 6 have been decided,
 - 13 were referred to an Administrative Law Judge,
 - 69 were returned to the agencies, and
 - 121 are pending informal hearings and decisions.
- 146

Efforts are ongoing to identify and correct the submission of incomplete cases.

Several BIA Superintendents retained jurisdiction over pending cases. During this reporting period, 104 cases were received, consisting of 60 that were less than \$1,000, and 44 between \$1,000 and \$5,000. Of these 104 cases:

- 76 were decided,
 - 2 were referred to an ALJ,
 - 0 were returned to the agency, and
 - 26 are pending.
- 104

A3. Complete Decisions on Current Docket and Incoming Cases. During the reporting cycle, OHA added 647 cases to its Indian Probate docket, and issued 683 Indian probate decisions. During FY 2000 OHA added 3,027 Indian probate cases to its active docket. During this time, OHA held 3,024 Indian probate hearings, and issued 3,309 Indian probate decisions. Consequently, OHA was able to reduce its pending docket of Indian probate cases from 4,128 at the beginning of the fiscal year to 3,836 cases at the end.

A4. Complete Decisions on Pending Cases. This milestone is scheduled to be completed by September 30, 2002. At the beginning of FY 2000 (October 1, 1999) there were 1,777 cases on the OHA docket that had been on OHA's docket more than 12 months. OHA issued decisions in 914 of those 1,777 cases during FY 2000. At the end of FY 2000 (September 30, 2000) OHA had 1,558 cases on its docket that had been on OHA's docket for more than 12 months. Because OHA lacked sufficient resources to decide more of these cases, the backlog of cases on the docket for more than 12 months was not significantly reduced. With the recent hiring of temporary probate judges and new ALJs, however, OHA expects this number to become considerably lower by the end of FY 2001. OHA will develop a better methodology for tracking these aged cases and focus its efforts on reducing them.

A5. Posting and Recordation of Probate Backlog. DataCom, Inc. independently verified the probate backlog of 1,940 cases at the Great Plains Land Title and Records Plant (LTRO), Aberdeen, South Dakota. During the fourth quarter, this backlog was

reduced by 308 cases. A further breakdown of these activities for both the Great Plains and Midwest Regions (both located physically at the Great Plains Regional Office) indicates that a total of 416 probates were posted to the land index, comprising 4,568 tracts of land. Of the 416 probates posted, 308 probates were encoded from ITI to LRIS, comprising 3,195 tracts. In addition, 96 probate cases required modifications and were returned to the LTRO.

DataCom also began work at the Southwest Regional Office located in Albuquerque, New Mexico, which serves Southwest, Navajo, and Western Regional Offices. Some 307 probates and modifications were received in the LTRO, which generated the creation or update of 990 index cards. Of the 307 probates, 143 were encoded by the contractor.

A6. Contract for Elimination of Probate Case Processing Backlog. The BIA prepared a draft statement of work (SOW) for the elimination of probate case processing backlogs. However, OST determined that the SOW should be revised to provide a more sufficient approach to reducing the probate backlog. By late October, a consensus was reached on a project approach and a contract vehicle for this task. A joint OST/BIA team has scheduled a meeting in November to begin revisions to the existing SOW to reflect this approach.

B. Address Probate Backlog Created by Youpee v. Babbitt. The Southern Plains Regional Office completed all recording activities in June, and the Pawnee Agency completed the posting of land ownership changes to their agency records by August 31, 2000. Phase II of the pilot project, Distribution of Income, began in September. BIA and OTFM designed and developed a comprehensive electronic spreadsheet to calculate interest and complete the journal voucher process. Data was encoded onto spreadsheets by BIA and verified by OTFM. A BIA employee has been detailed to OTFM to assist in the completion of Phase II. Interior's Office of Policy Analysis has agreed to prepare the economic analysis of the data collected in the pilot.

Congress did not fully fund OST's FY 2001 request for the Indian Land Consolidation Program, which includes the administration of the Youpee redistribution of interests. The BIA and OST will analyze the Pawnee Agency Pilot to determine methodology and options to reduce the backlog of Youpee cases.

H.1 Complete Staffing Needs Assessment to Determine Staffing Levels at BIA Field Office: Phase I. The Project Directors met several times with the Workforce Planning Subproject staff and BIA staff to coordinate a new statement of work for the contractor. The report prepared by Macro, International validated OHA's existing staffing needs as recommended by the Indian Probate Reinvention Lab, Phase II. The planning group agreed to expand and define more specifically BIA's field staffing needs and to more clearly distinguish the BIA's permanent staffing needs to process the current probate caseload.

K. Expand Existing OHA Caseload Tracking into a Joint Interim System. The Project Directors, an OST representative and the TAAMS development team met in Dallas, Texas, to view the demonstration of the OHA-7 Electronic Form and OHA database operating system. The attending group decided that it would be more cost effective and efficient to use the existing OHA system as the basis for TAAMS. Negotiations were held with LCL Designs, creator of the OHA system, to expand the

existing operating system into an interim web-based site so that both BIA and OHA would be able to access the system. BIA provided the new ADM and probate staff with stand-alone systems to expedite the process until the web-based system is in place for the electronic tracking of cases. The templates used have been updated and stand-alone systems are expected to be up and running by November.

L. Convert Interim Probate Tracking into a Comprehensive Probate Tracking and Caseload Management System. The first team meeting for the TAAMS probate design module was held in Denver, Colorado on September 6, 2000. The meeting was facilitated and coordinated with the TAAMS Subproject Coordinator. The team is headed by co-chairs from BIA and OHA and is composed of OHA Probate, BIA, and OTFM representatives. The probate design module will build on OHA's existing OHA-7 electronic form and database operating system. The first official working session was held at the TAAMS headquarters in Dallas, Texas, on November 1-3, 2000.

A computer equipment needs assessment for both the BIA and OHA was conducted in coordination with the TAAMS and computer architecture subprojects to identify those offices that will require equipment that is compatible with the conversion to TAAMS. The results indicate that for existing staff, the Y2K initiative satisfied 99% of the TAAMS user needs. The new BIA and OHA employees will be provided with a TAAMS compatible system in FY 2001. BIA is connected to a local area network within each office and also to a wide area network. OHA has a local area network and is presently installing and deploying a wide area network that will include the new offices in FY 2001.

N. Continue to Identify and Implement BIA and OHA Best Practices Through Implementation Phase of Reengineered Probate Process. The Probate Directors will dedicate staff and use contractors as necessary to achieve this milestone, which will ensure that the reinvented process is implemented to prevent future probate backlogs. The training conferences that were conducted in August and October provided opportunities for BIA and OHA offices to compare practices and consider revising existing practices. This was one of the first steps in identifying best practices. The probate project staff will conduct a more comprehensive review and take more detailed steps to institutionalize these practices.

R. Establish Partnerships with Indian Tribes:

R1. Inventory of P.L. 93-638 Tribes. A list of the Indian Tribes that contract and compact with the Offices of Self-Determination and Self-Governance for the BIA probate function has been prepared and is provided on the DOI-BIA Office of Trust Responsibilities Internet site. The project staff will be updating this list and conducting a survey of current and backlog probate cases. During August, the BIA Project Director participated in three Tribal consultations comprising seven regional offices and presented an overview of the proposed probate regulations, answered questions, and solicited comments from Indian Tribes and individuals.

IV. Changes/Corrections to the HLIP and Previous Quarterly Reports:

A2. Elimination of Summary Distribution Backlog. The completion date for the elimination of the Summary Distribution Cases has been extended to June 30, 2001. Due to the time necessary to establish offices and train new personnel, and the lack of full-time BIA probate personnel in FY 2000 to complete and process probate packages to the ADMs, full-scale operation has been somewhat delayed.

D. Establish OHA/BIA Implementation Team to Coordinate Implementation of Redesigned Probate Process. The completion date for this milestone has been changed to December 31, 2000.

(Section V. Milestone Chart starts on next page)

V. Milestone Chart for the Probate Backlog Subproject
Subproject Managers: Charles Breece, OHA and Kathleen Supernaw, BIA

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Strategies to Reduce Backlogs		
A1. Establish Attorney Decision Maker Positions as an Alternative Means of Deciding Cases	07/31/00	Completed
A2. Elimination of Summary Distribution Backlog.....	12/31/00	Revised to 6/30/01
A3. Complete Decisions on Current Docket and Incoming Cases	09/30/02	
A4. Complete Decisions on Pending Cases	09/30/02	
A5. Posting and Recordation of Probate Orders	12/31/01	
A6. Contract for Elimination of Probate Case Processing Backlog	12/31/02	
B. Address Probate Backlog Created by <i>Youpee v. Babbitt</i>	09/30/04	
C. Conduct Two-Phased Indian Probate Reinvention Lab to Develop a Reengineered Probate Process	11/29/99	Completed
D. Establish OHA/BIA Implementation Team to Coordinate Implementation of Redesigned Probate Process	09/30/00	Revised to 12/31/00
E. Authorize Increased Summary Distribution Threshold for BIA Agency Superintendents	08/24/99	Completed
F. Legislation to Authorize Hiring Indian Probate Judges	11/99	Completed
G. Hire Additional OHA Staff and Reopen Probate Offices.....	09/30/00	Completed
H. Complete Staffing Needs Assessment to Determine Staffing Levels at BIA Field Offices:		
H1. Phase I.....	TBD	
H2. Phase II.....	03/31/01	
I. Hire BIA Probate Staff and Establish BIA Professional Corps	06/30/01	
J. Identify Indian Probate Training Needs.....	08/31/00	Completed
K. Expand Existing OHA Caseload Tracking into a Joint Interim System	12/31/00	
L. Convert Interim Probate Tracking into a Comprehensive Probate Tracking and Caseload Management System.....	TBD	
M. Amend OHA Regulations and Promulgate BIA Regulations that Establish Policies and Procedures for the Indian Probate Program:		
M1. BIA Draft Regulations.....	06/30/00	Completed
M2. Promulgation of BIA Regulations	12/31/00	
M3. Promulgation of OHA Regulatory Amendments	07/31/01	
M4. Publication of an Interim Final Rule to Permit BIA Attorney Decision Makers to Make Summary Distributions.	05/02/00	Completed
N. Continue to Identify and Implement BIA and OHA Best Practices Through Implementation Phase of Reengineered Probate Process.....		Ongoing
O. Coordinate Implementation of Improved Probate Record Keeping Strategies	07/31/00	Completed
P. Initiate Customer Service Outreach	09/30/00	Completed
Q. Initiate Partnerships with Other Federal Agencies.....	08/31/01	
R. Establish Partnerships with Indian Tribes		
R1. Inventory of P.L. 93-638 Tribes	12/31/00	
R2. Model Memorandum of Understanding.....	09/30/00	Completed
R3. Inventory of Tribal Inheritance Codes	03/31/01	
R4. Model Inheritance Codes.....	06/30/01	

4. **BIA APPRAISALS**

1. **Statement of the Problem:**

In general, the regulations governing the processing of trust resource transactions require the Secretary to obtain fair market value for tribes and individual Indian owners on trust and restricted land and resources. To meet this requirement, an appraisal or other valuation is used as a management tool to ensure that fair and just compensation is received by the Indian landowner on transactions including, but not limited to, leases, rights-of-way, land sales, timber sales, land exchanges, grazing and range permits.

At the end of Fiscal Year 1999, the BIA estimated its appraisal backlog to be 2,000 requests. The result of this backlog is that a similar number of realty transactions have not been consummated for lack of a valuation of the trust resource. Some transactions have been pending for as long as three years.

2. **Summary of Milestones Due this Quarter:**

C. Develop and Maintain Database for Tracking Appraisals. *This milestone, scheduled for completion by September 30, 2000, was not met. A new date for the completion of this milestone will be determined in coordination with the TAAMS subproject, as the completion of this task is dependent on the completion of the TAAMS appraisal module.* The Bureau's Appraisal Design Team has completed the system requirements for the Appraisal Management System (AMS). The AMS will allow the Bureau to effectively track appraisal requests, ensure proper workload management, and promote consistency in business practices throughout the Bureau. The design team identified workflow processes, business rules, and data definitions to be considered by the TAAMS Project Office. The completed systems requirement was submitted to the TAAMS Project representative on August 28, 2000.

D. Evaluate and Survey Fair Market Value Appraisal Requirements. *This milestone, scheduled to be completed by October 31, 2000, has been met.* A team of Bureau appraisal and trust staff reviewed and analyzed the existing regulations and policies governing trust asset transactions. The team has concluded that no change to the existing appraisal and evaluation requirements is needed since the existing regulations and policies properly define the Secretary's trust responsibility, i.e. requiring approval of trust transactions with estimates of fair market value or fair annual rent. As set forth in the Bureau's Real Estate Services Appraisal Handbook (October, 1998), these market value estimates are based on the highest and best use analysis.

The HLIP identified the need to ensure that BIA trust management programs apply consistent resource valuation methods. The Appraisal Technical Board (ATB) has provided for consistent appraisal and evaluation methodology by requiring adherence to Uniform Standards of Professional Appraisal Practices (USPAP) methodology. Furthermore, the ATB has established the minimum reporting formats to communicate appraisals or evaluations for trust transactions. The Deputy Commissioner for Indian Affairs has directed the regions to adhere to this guidance and incorporate the ATB's Advisory Opinion into the Real Estate Services Appraisal Handbook.

H. Implement an Automated Comparable Sales/Lease Database System. *This milestone, scheduled to be completed by September 30, 2000, was not met. A new date for the completion of this milestone will be determined in coordination with the TAAMS subproject, as the completion of this task is dependent on the completion of the TAAMS appraisal module.* The Bureau's Appraisal Design Team submitted the completed systems requirement for the Comp Database System (CDS) to the TAAMS Project Office on September 29, 2000. The system requirements consisted of the identification of workflow processes, business rules, and data definitions. The CDS will allow the Bureau to store and retrieve real estate sales and lease data used in the analysis and valuation of trust lands. The system will be vital in streamlining the Bureau's appraisal process.

J. Upgrade the Bureau's Automated Systems. *This milestone, scheduled for completion by September 30, 2000, was not met.* The Bureau Chief Appraiser conducted a national survey to determine the number of computers and other equipment needed at each Regional Office. Twenty-nine of 110 requisitioned items have not been purchased and installed due to problems with the subcontractor. An alternative supply source was selected and installations will be completed by December 15, 2000.

L. Reduce Rocky Mountain Region Appraisal Backlog. *This milestone was scheduled to be completed by August 31, 2000. This milestone date was not met, however, this task was completed on September 22, 2000.* The Bureau has successfully eliminated the appraisal backlog at the Rocky Mountain Region. The Bureau assigned appraisers from various Regional Offices to strategic locations in the Rocky Mountain Region to complete this task. Regional Review Appraisers and Staff Appraisers were teamed to streamline the appraisal, review, and approval process. The appraisal backlog elimination teams utilized various appraisal techniques such as site-specific appraisals, mass appraisals, and market analysis to complete the valuations. The teams ensured that each appraisal was completed in accordance with the USPAP. Funds in the FY 2001 budget have been allocated for two additional appraisers for this region in order to prevent a future backlog from developing.

Rocky Mountain Region Appraisal Backlog Elimination Project FY 2000

AGENCY	COMPLETED APPRAISALS & REVIEWS
Blackfeet Agency	1,485
Crow Agency	243
Northern Cheyenne Agency	79
Fort Peck Agency	403
Fort Belknap Agency	344
Wind River Agency	400
TOTAL COMPLETED	2,954

III. Summary of Ongoing Activities: N/A

IV. Changes/Corrections to the HLIP or Previous Quarterly Reports:

- C. Develop and Maintain Database for Tracking Appraisals.** A new date for the completion of this milestone will be determined in coordination with the TAAMS subproject. Data has been supplied to the TAAMS system developers and work will be coordinated with them to determine a new milestone date and to complete this milestone task.

- H. Implement an Automated Comparable Sales/Lease Database System.** A new date for the completion of this milestone will be determined in coordination with the TAAMS subproject. Data has been supplied to the TAAMS system developers and work will be coordinated with them to determine new milestone dates and to complete these milestone tasks.

- J. Upgrade the Bureau's Automated Systems.** The revised date for completion of this task is December 15, 2000.

**V. Milestone Chart for BIA Appraisal Program Subproject
Subproject Manager: Gabriel Sneazy, BIA**

<u>Milestone</u>	<u>Schedule</u>
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded	
A. Determine and Ensure Certification Qualifications of BIA Appraisers	Ongoing
B. Development of a Real Estate Appraisal Handbook.....	10/14/98 Completed
C. Develop and Maintain Database for Tracking Appraisals.....	09/30/00 TBD
D. Evaluate and Survey Fair Market Value Appraisal Requirements.....	10/31/00 Completed
E. Hire Bureau-Wide Chief Appraiser.....	06/21/99 Completed
F. Create Appraisal Technical Board	04/27/99 Completed
G. Implement a Standard Appraisal Request Form.....	11/22/99 Completed
H. Implement an Automated Comparable Sales/Lease Database System.....	09/30/00 TBD
I. Contract On-Line Real Estate Providers in Locations Where Available	04/28/00 Completed
J. Upgrade the Bureau's Automated Systems.....	09/30/00 Revised to 12/15/00
K. Realign Line Authority to Ensure Consistent Management and Overview of Appraisal Program	12/31/00
L. Reduce Rocky Mountain Region Appraisal Backlog	08/31/00 Completed 9/22/00

6. TRUST ASSET AND ACCOUNTING MANAGEMENT SYSTEM (TAAMS)

I. Statement of the Problem:

There are currently two BIA-wide automated systems used to manage Indian trust assets: the Land Records Information System and the Integrated Records Management System (IRMS). Neither system is integrated, they have no electronic interface with other trust systems, they utilize redundant data and virtually no internal or data entry auditing requirements exist. Nor do either LRIS or IRMS fully or adequately support all of the activities performed by the BIA offices at the regional, agency or tribal level.

The Trust Asset and Accounting Management System that will replace existing systems and address current system shortcomings is comprised of a modified commercial off-the-shelf general trust asset management system. The TAAMS will include master lease, billing and accounts receivable, collection subsystems, and land title functions.

II. Summary of Milestones Due this Quarter:

K2. Complete System Modification Effort – Realty Functions and Interfaces. *This milestone was scheduled to be completed by August 31, 2000. This milestone was not met.* The HLIP noted that this would be an “iterative process of developing system prototypes” and that “each prototype is reviewed by the user and further revisions are made until the prototype is accurate and reflects business needs”.

Preliminary results from the transactional verification analysis of the leasing module in the Rocky Mountain Regional Office and subordinate agency offices indicate that the vendor may need to make additional modifications to TAAMS before it can be used as the system of record in this region. The additional modifications are not major design changes, however, they are integral to the leasing process and must be completed prior to its full-time use. The *Third Quarterly Report* indicated that the leasing, distribution and accounts receivable functionality of TAAMS would be redeployed to Rocky Mountain Region staff in September 2000. The results of the analysis mentioned above, however, resulted in additional work being necessary before this redeployment could take place.

The *Third Quarterly Report* also indicated that the title portion of TAAMS may be deployed to the Pacific Region in September 2000. This deployment did not occur, as a determination was made that the data at the Pacific Region was not of sufficient quality to allow for a meaningful conversion.

S2. Realty Functions and Interfaces Start. *This milestone was scheduled to be completed by August 31, 2000. This milestone was missed, as it is dependent upon the completion of Milestone K2, Complete System Modification Effort – Realty Functions and Interfaces, discussed above.* Upon the completion of system testing, transactional verification and analysis, TAAMS will be released for use as the system of record. It is expected that this will occur shortly after the completion of the “follow-up” system and user test scheduled to begin February 12, 2001. Deployment will occur 30 – 60 days after the modifications are complete and the Department has notified Congress.

T. Complete TAAMS Deferred Modifications. *This milestone, scheduled to be completed by September 30, 2000, was missed.* The basic approach of the TAAMS phase I activities has been to include all necessary functionality whether or not it was originally identified as “mandatory-deferred”. The BIA will schedule future enhancements after TAAMS has been utilized in the field for at least a short period of time in order to ensure that there is time to identify any needed additional functionality. As a result, enhancements of the system may not be initiated until late in FY 2001 at the earliest.

III. Summary of Ongoing Activities:

During the week of September 26-29, 2000, the TAAMS project management team met with the BIA regional directors, key members of the Rocky Mountain Region test team and the software vendor, Applied Terravision Systems, Inc., to review the ongoing status of the TAAMS initiative in general, and the progress of the leasing module test.

One of the primary findings of the assembled group was that the activities associated with the deployment of TAAMS, such as conversion, data cleanup, data analysis, etc., were far more intensive and required far more resources than originally estimated. The continuing system development activities further drain BIA staff resources, and impact other HLIP projects.

The TAAMS team concluded that it was not in the best interest of the initiative to continue to work on several fronts and in many geographic areas at the same time. Therefore, the TAAMS team developed a more focused deployment approach that systematically stresses the successful conclusion of all preliminary data cleanup, conversion, data analysis and deployment activities at one site before moving on to another site. While this inhibits long-term planning because a delay at one site will delay the entire schedule, it will further ensure the ultimate success of TAAMS.

The schedule for TAAMS deployment and associated activities has been developed by dividing the 12 BIA regions into three groups. These groups were formed according to the relationship between regions from a land title and records office perspective, as well as the data cleanup challenges and the use of automated systems for the leasing activity. The groups are distinguished as follows:

- Group A – Rocky Mountain, Southern Plains, Alaska and Eastern Oklahoma Regions
- Group B – Northwest, Southwest, Western and Navajo Regions
- Group C – Pacific, Great Plains, Midwest and Eastern Regions

During the September meeting, the TAAMS team also reviewed the ongoing eight-week leasing, accounts receivable, distribution and interface test. The test was very successful in that it presented a clear picture of what has been accomplished and what tasks remain to be performed before TAAMS can be considered fully ready for use. A Transactional Verification Analysis (TVA) report developed by the BIA fully outlines the remaining issues in detail. A preliminary version of the report has been delivered to the software vendor and work toward making the necessary corrections has begun. A formal review with the vendor and the TAAMS team is scheduled to occur on November 28-29, 2000, when all remaining issues are expected to be discussed and agreed upon. Oil and gas and interest interface testing is continuing, and the most recent tests have passed the majority of edits.

As is consistent with the BIA's lifecycle development method of evolutionary prototyping, another version of the TAAMS leasing module will be completed and scheduled for full testing in mid-January. This test will again evaluate all aspects of leasing, accounts receivable, distribution and interface. In addition, the title functionality will again be tested to ensure that it interacts properly with the leasing module.

BIA has provided the following schedule of activities and dates planned for the coming months:

- December 5, 2000 – Completion of re-mapping of history data
- January 5, 2001 – Completion of remaining leasing items as determined by the TVA
- January 22, 2001 – Initiate system test (Dallas, TX)
- January 26, 2001 – Completion of title history
- February 12, 2001 – Initiate follow-up leasing test (Rocky Mountain Region)
- March 16, 2001 – Complete follow-up leasing test
- March 30, 2001 – TAAMS realty module deployment decision for remaining Group A offices

K1. Complete System Modification Effort – Title Portion. The LTRO managers in the Southern Plains and Rocky Mountain Regions requested a small number of modifications to TAAMS to address transactions that occur occasionally and were not considered during the original design effort. It was determined that these transactions, one being the ability to handle "Youpee" cases, could not wait for the next release of TAAMS. The new release was completed on October 18, 2000 and deployed to the title offices currently using TAAMS.

IV. Corrections/Changes to the HLIP or Previous Quarterly Reports: New milestone dates are needed for the following milestones:

K2. Complete System Modification Effort – Realty Functions and Interfaces.

S2. Realty Functions and Interfaces Start.

T. Complete TAAMS Deferred Modifications.

(Section V. Milestone Chart starts on next page)

V. Milestone Chart for TAAMS System Subproject
Subproject Manager: Chester Mills, BIA

Milestone	Schedule	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Select Pilot Site	11/13/97	Completed
B. Acquire External Professional Consulting Services.....	03/31/99	Completed
C. Assemble Senior BIA and OST Team to Develop Requirements	04/24/98	Completed
D. Prepare and Publish RFI for COTS Systems	06/19/98	Completed
E. Organize Joint Technical Team to Develop Detailed Specifications & RFI.....	09/30/98	Completed
F. Obtain DOI Approval (TIA/IRMC) for System and Approach.....	09/11/98	Completed
G. Develop RFP Using Joint BIA/OST Technical Team/Systems Consultant	08/27/98	Completed
H. Select TAAMS Project Management Team	11/30/98	Completed
I. Award Contract to Successful Proposer	12/02/98	Completed
J. Develop System Modification and Deployment Strategy with Contractor	05/31/99	Completed
K. Complete System Modification Effort		
K1. Title Portion.....	04/17/00	Completed
K2. Realty Functions and Interfaces	08/31/00	TBD
L. Analyze National Requirements for User Work Stations - Rocky Mountain Region		Completed ¹
M. Conduct System Testing	11/22/99	Completed
N. Complete Training of Support and User Personnel at Rocky Mountain Region.....	06/30/99	Completed
O. Complete Independent Verification and Validation.....	02/28/00	Completed
P. Initiate TAAMS Pilot at BIA's Rocky Mountain Region	06/25/99	Completed
Q. Perform User Test at Pilot Site.....	02/04/00	Completed
R. Deployment Decision Review	03/22/00	Completed
S. Deployment to BIA and Tribal Sites		
S1. Title Portion Start	05/30/00	Completed
S2. Realty Functions and Interfaces Start	08/31/00	TBD
T. Complete TAAMS Deferred Modifications	09/30/00	TBD
U. TAAMS Documentation and Supporting Information.....		As needed
V. TAAMS Ongoing Operations.....		Ongoing

¹Hardware to be provided in concert with TAAMS deployment.

7. MMS SYSTEMS REENGINEERING

I. Statement of the Problem:

Faced with changing energy markets, new legislative mandates, and aging computer systems, the Royalty Management Program (RMP) made the decision to reengineer its core business processes and support systems. This initiative is necessary in order for the RMP to remain cost-effective and responsive to customer needs and to fulfill its trust responsibility to American Indians.

Note: Effective October 8, 2000, the RMP implemented a Congressionally approved reorganization, becoming Minerals Revenue Management (MRM). The reorganization implemented a reengineering effort that redesigned and streamlined the RMP's business processes.

II. Summary of Milestones Due this Quarter:

K5. Complete Detailed Application Design for Future Financial System. *This milestone completion date of August 31, 2000, was missed. However, this task was completed on October 13, 2000.* This is a critical milestone for the new MRM Financial System and provides the foundation for Andersen Consulting to complete building and testing the financial application components. MRM also completed the design of the database and established the underlying technical infrastructure to be used to integrate the compliance and asset management and financial system and royalty management systems.

The original completion date was not met in order to: 1) accommodate MRM requested walk-throughs for many of the Detail Design Programs; 2) allow for a thorough analysis of several open issues and to work out viable solutions; 3) allow Andersen Consulting time to review, research and respond to many questions MRM had on the Detail Design Document; and, 4) extend coordination time with external constituencies to ensure their support. It is important to note that although the Detailed Application Design was not completed until October 13, 2000, the overall project schedule and delivery dates were not affected.

K6. Data Conversion Plan Finalized. *This milestone, scheduled to be completed by October 13, 2000, was met.* The Data Conversion Approach, completed in September, 2000, provides a high-level direction to the overall data conversion effort. The Data Conversion Plan serves as a management tool and provides a more detailed direction for the data conversion effort. It also provides a detailed schedule for the data conversion development effort and an initial draft of the conversion-to-production schedule. The Data Conversion Plan defines the data conversion workplan, an analysis of all conversion target database tables, and conversion-related issues and assumptions identified to date. This plan will be updated to reflect actual results of the design, build, and test activities.

M. Award Compliance System Contract. *This milestone, scheduled to be completed by September 30, 2000, was met.* In September, 2000, MRM completed a contract award to Andersen Consulting for the design, development, and implementation of the new Compliance System and supporting Data Warehouse.

III. Summary of Ongoing Activities:

C. Benchmark the Process. The Andersen Consulting proposal for MRM's new compliance and asset management system incorporates best practices from the energy industry. Andersen's assessment confirms that MMS's reengineering guiding principles are closely aligned with industry's best practices such as organizing into cross-functional teams, creating geographically-based organizations that focus on producing assets and targeting the allocation of resources and effort based on risk and exposure. Andersen Consulting and MRM cosponsored a showcase of successful technology solution approaches at the Department of the Interior's Technology Conference in October 2000.

E. Obtain Customer/Constituency Input. In September 2000, MMS met with officials of the State and Tribal Royalty Audit Committee (STRAC) to provide an overview of the financial and compliance and asset management systems development to date. MMS discussed with STRAC the fundamental compliance approach including the management, functional, technical and overall data architecture being proposed by Andersen Consulting.

In October 2000, MMS met with the Council of Petroleum Accountants Societies (COPAS). MMS provided updates on the financial, compliance and asset management systems development, the fundamental compliance approach, impacts to industry, data conversion, royalty-in-kind, and the new Minerals Revenue Management (MRM) organization. MMS meets with its State and Tribal constituencies and COPAS on a quarterly basis to provide them with Reengineering Initiative updates and to obtain input on various system and process-related issues.

In October 2000, MMS also met with representatives from the Western States Lands Commission Association to provide an update on MMS' Reengineering Initiative. MMS discussed the financial, compliance and asset management systems development to date, MRM's prototype and future analytical tools, document management, knowledge management, and delegation to states. MMS received feedback from BIA and their contractor on MMS' new system format. MMS is in the process of advising BIA/TAAMS on coordination needs for system interface testing. The Indian Minerals Steering Committee (IMSC) authorized a team to gather input from individual Indian mineral owners and Federal agencies on customer service. The team gave the IMSC a report detailing the results and providing recommendations on improved customer service in October 2000.

IV. Changes/Corrections to HLIP or Previous Quarterly Reports. None.

(Section V. Milestone Chart starts on next page)

V. Milestone Chart for MMS System Reengineering Subproject
Subproject Manager: Milt Dial, MMS

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Initiate Program-Wide Reengineering with Full-Time Design Team.....	04/30/97	Completed
B. Identify Processes for Business Process Review.....	05/31/97	Completed
C. Benchmark the Processes.....		Ongoing
D. Map Processes.....	07/11/97	Completed
E. Obtain Customer/Constituency Input.....		Ongoing
F. Complete Preliminary Design Document/Decision to Proceed.....	03/31/98	Completed
G. Complete Prototyping and Pilot Testing.....	09/30/98	Completed
H. Complete Project Capital Investment Plan & Independent Verification and Validation.....	09/30/98	Completed
I. Issue Implementation Plans - Road Map to 21st Century.....	11/30/98	Completed
J. Implement Process Leading to Award of Financial System Contract		
J1. Issue Request for Proposals (RFP) for COTS-based Financial System, Relational Data Base Management System, and Spiral Development Strategy to Include Data Warehouse Structure.....	04/09/99	Completed
J2. Conduct Vendor On-site Visits with MMS/RMP Staff.....	05/31/99	Completed
J3. Receive RFP Proposals and Begin Evaluation.....	06/02/99	Completed
J4. Evaluate Proposals, Including COTS Specific Independent Functional Validation.....	07/09/99	Completed
J5. Complete Evaluations and Commence Procurement Activity/Negotiations.....	07/23/99	Completed
J6. Award Financial System Development Contract.....	09/23/99	Completed
K. Develop Financial System Consistent with Contract Deliverables Schedule and Transition and Training Strategies		
K1. Initiate Development Contract Mobilization Under 120-Day Activity Plan.....	10/01/99	Completed
K2. Establish Financial Contract Management Plans and Schedule for Development Deliverables from Award Date to 9/30/01, and Commence Systems Analysis, Design and Development Activities which will include Testing and Independent Validation of TAAMS/TFAS interfaces.....	01/31/00	Completed
K3. Complete COTS Fit Analysis.....	02/28/00	Completed
K4. Complete General Design for Future Financial Systems.....	06/30/00	Completed
K5. Complete Detailed Application Design.....	08/31/00	Completed
K6. Data Conversion Plan Finalized.....	10/13/00	Completed
K7. System Test Plan Finalized.....	12/15/00	
K8. Build and Test Application Components.....	02/28/01	
K9. Design, Build and Test Data Conversion.....	04/30/01	
K10. Plan and Execute Functional and Performance Acceptance Test.....	08/31/01	
L. Complete Development and Delivery of Financial System, Relational Data Base Management System and Related Modules.....	09/30/01	
M. Award Compliance System Contract.....	09/30/00	Completed
N. Complete Development and Delivery of Compliance System.....	09/30/01	

8. RECORDS MANAGEMENT

I. Statement of the Problem:

The inadequacies of Indian trust records have been well documented in Congressional reports, legal documents and testimony, the Special Trustee's Strategic Plan, various audits and oversight reports including those of the National Archives and Records Administration (NARA), and in the media. Among the primary obstacles to improving the Indian trust management program and complying with the *American Indian Trust Fund Management Reform Act of 1994* are the poor records and record keeping systems of the Bureau of Indian Affairs. The decentralization of the BIA and varying conditions at its offices have resulted in a complex record keeping environment, even as reliance on its records has increased. Attempts in the early 1990's to correct these problems were insufficient, inconsistent, and cut short by reductions in resources. Since Secretarial Order 3197 transferred the financial trust services function from BIA to the OST in February 1996, some of the deficiencies apply to OST as well.

II. Summary of Milestones Due this Quarter:

No milestones were due this quarter.

III. Summary of Ongoing Activities:

T. Establish Evaluation Teams and Begin Cyclic Evaluations of Records Programs. This ongoing milestone started in April 2000. During this reporting period, the Indian Affairs Records Management (IARM) staff conducted evaluations at 25 BIA locations. Under normal circumstances, the records program evaluation process is used to ensure compliance with appropriate policies and procedures, and good business practices. Realizing, however, that records management programs at most BIA locations have been neglected for some time, the evaluation process is being used as a means of identifying major problems and helping set priorities for program improvements at the local level. As new records management practices and procedures are implemented, and as BIA offices are made aware of these new practices, the criteria used to conduct the evaluations will be revised and expanded. IARM has found that BIA employees are, within available resources, taking their records responsibilities seriously and are attempting to comply with established procedures. IARM is working with BIA to improve local programs on a location-by-location basis.

Y. Award New Contract for OST Imaging. This milestone is scheduled to be completed by November 2000. During August, a bidders conference was held in Albuquerque. More than 30 vendors attended and OST addressed oral and written questions. During September, proposals were received. Technical, management, and price evaluations were completed and proposals were narrowed to what is called the competitive range. In October, bidders in the competitive range demonstrated their ability to perform requirements of the contract. The Technical Evaluation Team evaluated these demonstrations and a final competitive range was determined.

BB. Complete Vital Records Plan. This milestone is scheduled to be completed no later than April 2001. In August, a contract was awarded to Bradson Corporation to develop vital records plans for BIA and OST trust records. Although Bradson

Corporation and IARM will do preliminary work needed to develop plans, this task requires the active involvement and participation of BIA and OST. Only program managers know the operating records needed at relocation sites in order to function during and/or after an emergency or disaster. An action plan has been prepared and activities are scheduled to begin in November 2000.

DD. Complete Submission of Records Control Schedules. This milestone is scheduled to be completed no later than June 2001. During this reporting period, IARM incorporated a number of General Records Schedules (GRS) issued by the Archivist of the United States into the BIA's records schedule. The GRS provides mandatory disposition instructions for common temporary administrative records (not trust records) relating to civilian personnel, fiscal accounting, procurement, communications, printing, and other common functions. Also during this reporting period, the records schedule development action plan was modified somewhat. The project, however, continues to be on a "fast track" and it is expected that the established completion date will be met.

EE. Establish Pilot Project(s) for Electronic Record Keeping. One or more projects under this milestone are expected to begin by December 2000, with one or more additional projects scheduled to start before December 2001.

One pilot project was initiated in January 2000. The project is to design, develop, and implement a system that will capture incoming, faxed background documentation, match it to an electronic TFAS transaction, and allow OTFM staff to view and act on the transaction without printing the faxes. Progress has been delayed by the vendor, Siemens Business Systems, as it is being acquired by another company, TREEV, Inc. TREEV representatives visited Albuquerque in August to see the current operation and verify their understanding of what needs to be done. A proposed design document was delivered in September and has been reviewed.

Preliminary discussions are underway to develop a second pilot project.

GG. Analyze Records Storage Requirements. This milestone is scheduled to be completed no later than December 2001. During this reporting period, IARM staff visited 26 BIA locations to assess storage requirements for active records. While a major emphasis has been placed on cleaning up inactive records stored off-site, many records maintained in offices are also inactive records that should be sent to a Federal Records Center (FRC). Once these records are properly attended to—transferred to an FRC or destroyed—IARM will be able to accurately determine storage requirements for records needed to conduct daily work. Even so, IARM has purchased lateral space saver filing systems for 27 BIA locations.

HH. Eliminate Existing Disposition Backlogs at BIA Agencies. This milestone is scheduled to be completed no later than May 2002. During this reporting period, the IARM staff visited 26 BIA locations to assess records backlogs and to identify records that can be transferred to an FRC or other appropriate storage sites, or can be disposed of properly. The IARM staff and contract employees continued working onsite in the Rocky Mountain Regional Office to prepare over 1,000 boxes of records for transfer to an FRC. Over 2,300 boxes of records from four BIA locations (Blackfeet, Wind River and Ft. Belknap agencies, and the Rocky Mountain Regional Office) also were shipped to Albuquerque to prepare them for transfer to an FRC. In addition, during this period,

over 1,600 boxes of records from various BIA locations were approved for transfer to an FRC.

IV. Changes/Corrections to the HLIP or Previous Quarterly Reports:

I. Eliminate Existing Disposition Backlog at BIA Locations. Milestones I and HH reflect the identical task and have identical milestone completion dates of May 31, 2002. To more efficiently track progress on this activity, these two milestone activities were originally established to demonstrate the initiation and the conclusion of this activity. Milestone I reflects the initiation of activity to eliminate existing disposition backlogs at BIA Agencies, and Milestone HH represents the projected conclusion of this effort. As noted in the HLIP, Milestone I “was initiated in May 1999”. Thus, Milestone I has been completed.

P. Analyze Records Storage Requirements. Milestones P and GG reflect the identical task and have identical milestone completion dates of December 31, 2001. To more efficiently track progress on this activity, these two milestone activities were originally established to demonstrate the initiation and the conclusion of this activity. Milestone P reflects the initiation of activity to analyze records storage requirements, and Milestone GG represents the projected completion date of this effort. As noted in the HLIP, Milestone P “was initiated in November 1999”. Thus, Milestone P has been completed.

V and FF. Complete Analysis of BIA Records Imaging Requirements. Milestone V represents the initiation of this two-year task which began in February 2000. Through a clerical error, the completion date of this task, represented by Milestone FF, was the same as the beginning date. The correct completion date for Milestone FF is December 31, 2001.

CC. Publish Trust Records Instructional Guide in Conjunction with MMS, BLM and OHA. This milestone is scheduled to be completed by December 31, 2000. A revised date for the completion of this milestone is December 31, 2001.

The successful issuance of the instructional guide depends on the approval of trust records disposition schedules (see Milestone DD). The schedules are due for submission to the National Archives and Records Administration by June 2001. NARA has promised a 180-day turn-around. The final issuance of the desk guide cannot be published before approval of the schedules by the Archivist of the United States. Working with BLM, MMS, and OHA, however, IARM will issue a series of interim informal informational guides during 2001.

EE. Establish Pilot Project(s) for Electronic Record Keeping. Through a clerical error in the HLIP, the completion date for this milestone was listed as December 31, 2000, however, at least two tasks are associated with the completion of this milestone. Pursuant to the HLIP, one pilot project was to be initiated by December 31, 2000, with a second pilot initiated by December 31, 2001. The first pilot was initiated in January 2000. A milestone date that would more accurately reflect the completion of both tasks in this milestone is December 31, 2001, when the second pilot project is scheduled to be initiated.

V. Milestone Chart for Records Management Subproject
Subproject Manager: Ken Rossman, OST

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Establish OST/BIA Working Group to Coordinate Joint Records Solution.....	02/11/98	Completed
B. Transfer Control Over Trust Financial Records from BIA to OST	03/05/98	Completed
C. Develop Joint Procedures for Records Access	06/09/98	Completed
D. Develop Agreement Between OST and BIA on Records Operations	06/09/98	Completed
E. Prepare Plan/Gain Approval of Records Imaging Technology	06/30/98	Completed
F. Commence Records Imaging Efforts	06/30/98	Completed
G. Initiate Development of Records Control Schedules	09/30/98	Completed
H. Develop an Agreed Upon Approach to Indian Trust Records Management ...	05/19/99	Completed
I. Eliminate Existing Disposition Backlogs at BIA Agencies (see HH)	05/31/99	Completed/ Corrected
J. Complete Systematic Centralization of OST Financial Trust Records	10/08/99	Completed
K. Hire Records Management Specialists.....	01/31/00	Completed
L. Develop & Issue Records Manuals, Training Aids & Technical Assistance	12/31/01	
M. Train Records Staff and Trust-Related Program Personnel.....	12/31/01	
N. Lift BIA Moratorium on Retiring Records to Federal Records Centers.....	04/04/00	Completed
O. Resolve Jacket Folder Retention/Production Issue with Tribes		Ongoing
P. Analyze Records Storage Requirements (see GG).....	11/30/99	Completed/ Corrected
Q. Survey Trust Records Retention and Safeguarding	12/31/99	Completed
R. Establish Advisory Committee on Records.....	08/31/01	
S. Establish Life Cycle Database (Inventory) for Trust and Other Records.....	12/31/01	
T. Establish Evaluation Teams and Begin Cyclic Evaluations of Records Programs.....	04/27/00	Completed
U. Initiate Training for Compacted and Contracted Trust Records	12/31/99	Completed
V. Initiate Study of BIA Imaging Needs (see FF)	02/28/00	Completed/ Corrected
W. Initiate Action to Replace Historical Records with Working Copies.....	05/30/00	Completed
X. Review Trust Records Policies and Procedures with MMS, BLM, and DOI and Establish Continuing Dialogue	01/31/00	Completed
Y. Award New Contract for OST Imaging.....	11/30/00	
Z. Publish Proposed Regulations for Compacted/Contracted Trust Program Records	12/31/00	
AA. Complete Plan to Comply with Electronic Records Regulations	03/31/01	
BB. Complete Vital Records Plan	04/30/01	
CC. Publish Trust Records Instructional Guide in Conjunction with MMS, BLM and OHA	12/31/00	Changed to 12/31/01
DD. Complete Submission of Records Control Schedules to NARA.....	06/30/01	
EE. Establish Pilot Project(s) for Electronic Record Keeping.....	12/31/00	Corrected to 12/31/01
FF. Complete Analysis of BIA Records Imaging Requirements	12/31/00	Corrected to 12/31/01
GG. Complete Analysis of Records Storage Requirements.....	12/31/01	
HH. Complete Project to Cleanup Existing Disposition Backlog at BIA Agencies..	05/31/02	

9. TRUST POLICIES AND PROCEDURES

I. Statement of the Problem:

Proper management of Indian trust assets has been hampered by a lack of comprehensive, consistent, up-to-date regulations, policies, and procedures covering the entire trust cycle. Additionally, contemporary federal environmental protection statutes have placed agencies with little direct previous experience in managing Indian trust resources in the position of significantly affecting the use and disposition of Indian trust resources. This has resulted in program gaps and divergent practices, and a corresponding inability to ensure that consistent, sound policies and procedures are applied across the Department in its fulfillment of its trust responsibility. Moreover, there is a need for a comprehensive review of statutory and regulatory authorities and internal program guidance (such as procedural manuals or interagency agreements) to determine the need for revisions and/or the generation of new guidance.

II. Summary of Milestones Due this Quarter:

E. Analyze Departmental Functions Relating to Trust Resources. The reports received under this milestone contain the results of the analyses performed by the bureaus and offices reporting during this quarter, along with proposed schedules for revisions or development of statutory authorities, regulations and internal program guidance. These reports are laying the groundwork for Milestone F, when the Trust Policies and Procedures staff will present crosscutting policy issues to the Department's Trust Policy Council along with recommendations for resolving any problems identified. The Trust Policies and Procedures Subproject Office continues to assist the Department's bureaus and offices in their analyses of their regulations and internal policies governing their Indian trust activities.

E1. Office of the Special Trustee for American Indians (OST): *The milestone was scheduled to be completed August 31, 2000, but this milestone date was missed. OST provided this report on October 31, 2000.*

E2. Office of Hearings and Appeals (OHA): *The milestone was scheduled to be completed September 30, 2000. This milestone date was met.*

E3. Bureau of Reclamation (BOR): *The milestone was scheduled to be completed September 30, 2000, but this milestone date was missed. The report was received on October 20, 2000.*

E4. United States Geological Survey (USGS): *The milestone was scheduled to be completed September 30, 2000. This milestone date was met.*

E5. Office of Surface Mining, Reclamation and Enforcement (OSM): *The milestone was scheduled to be completed October 31, 2000, but this milestone date was missed. A new date for the completion of this milestone is November 30, 2000.*

E9. Bureau of Land Management (BLM): *The milestone was scheduled to be completed October 31, 2000. This milestone date was met.*

III. Summary of Ongoing Activities:

C1b. Develop Departmental Regulatory Initiatives: BIA First-Tier Trust Management Rules – Publish Final Rules. During this reporting period, the 90-day public comment period concluded on October 12, 2000. During August, the Trust Policies and Procedures Subproject Office held eight Tribal consultation meetings and continued its discussions with the joint working group of the National Congress of American Indians and the Inter-Tribal Monitoring Association. In November and December 2000, the Subproject Office will complete its review of the comments and revise the regulations for publication as final rules.

IV. Changes/Corrections to the HLIP or Prior Quarterly Reports:

C3c. OHA – Publish Final Rules: In order to be consistent with information provided in the Probate Subproject chapter in the HLIP, it is necessary to incorporate a new subtask to represent the projected date of July 31, 2001, for publication of the OHA final rule. The publication of the OHA final rule is dependent upon the timely publication of BIA final rules that establish policies and procedures for the Indian probate program.

E. Analyze Departmental Functions Relating to Trust Resources.

E5. Office of Surface Mining Reclamation and Enforcement (OSM): The new date for the completion of this milestone is November 30, 2000.

(Section V. Milestone Chart starts on next page)

**V. Milestone Chart for the Policy and Procedures Subproject
Subproject Manager: Art Gary, AS-IA**

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Designate Department-Level Project Manager and Transfer Subproject from the Office of the Special Trustee to BIA		
A1. Transfer of Subproject	08/31/99	Completed
A2. Staffing of Subproject	06/30/00	Completed
B. Develop Trust Principles for Departmental Management of Indian Natural Resources and Money		
B1. Initial Draft of Trust Principles.....	11/30/99	Completed
B2. Tribal Consultations	12/31/99	Completed
B3. Departmental Clearance.....	04/28/00	Completed
C. Develop Departmental Regulatory Initiatives		
C1. BIA		
C1a. Publish Proposed Rules	06/30/00	Completed
C1b. Publish Final Rules.....	12/31/00	
C2. MMS		
C2a. Modify Proposed Rules	01/05/00	Completed
C2b. Comment Period Closes	03/06/00	Completed
C2c. Further Action	TBD	
C3. OHA		
C3a. Publish Interim Final Rule	05/02/00	Completed
C3b. Publish Proposed Rules	12/30/00	
C3c. Publish Final Rules.....	07/31/01	Addition
D. Identify Departmental Programs and Functions that Affect Indian Trust Resources		
D1. Prepare Agency Guidance Memorandum	05/09/00	Completed
D2. BIA	09/30/99	Completed
D3. OST	05/30/00	Completed
D4. OSM.....	05/30/00	Completed
D5. OHA, BOR	05/30/00	Completed
D6. MMS, BLM, USGS.....	06/30/00	Completed
D7. NPS	07/31/00	Completed
D8 FWS.....	07/31/00	Completed
E. Analyze Departmental Functions Relating to Trust Resources:		
E1. OST.....	08/31/00	Completed
		10/31/00
E2. OHA	09/30/00	Completed
E3. BOR	09/30/00	Completed
		10/20/00
E4. USGS	09/30/00	Completed
E5. OSM.....	10/31/00	Revised to
		11/30/00
E6. MMS.....	11/30/00	
E7. FWS	02/28/01	
E8. BIA	03/30/01	
E9. BLM.....	10/31/00	Completed
E10. NPS.....	02/28/01	
F. Analyze Cross-cutting Issues and Problems	07/31/01	
G. Develop and Publish Revised Regulations	06/30/04	
H. Revise and Develop Internal Program Guidance Where Needed	TBD	
I. Develop Statutory Revisions	12/31/02	

10. TRAINING

I. Statement of the Problem:

Lack of adequate training of staff to deliver Indian trust fiduciary responsibilities to American Indians has been cited in numerous Office of the Inspector General and General Accounting Office reports as a problem area. In addition to a historic lack of adequate training, new trust accounting and asset management systems are being installed to improve the discharge of the Secretary's trust responsibilities to those American Indian tribes and individuals for which the Federal government holds and manages assets in trust, the comprehension and use of which will require a coordinated and specialized training effort.

II. Summary of Milestones Due this Quarter:

J. Finalize and Approve Training Plan for Non-Systems Training. *This milestone, scheduled for completion on August 31, 2000, was met.* Upper Mohawk, Inc. (UMI), the contractor selected to oversee and manage the implementation of the non-systems training effort, provided the Final Training Plan to OST on August 28, 2000. This training plan outlines the trust asset management training courses that will be offered, and an anticipated schedule for the provision of the courses nationwide. The plan anticipates the non-systems training program will commence in January 2001. The implementation of this training program is a dynamic process, which will involve coordination with other training efforts currently underway. It is recognized that the details outlined in the training plan submitted in August 2000 will continue to evolve throughout the lifetime of this project.

K. Award Contracts to Training Providers. *This milestone, scheduled for completion on August 31, 2000, was met.* Pursuant to the training plan, trainers from UMI will provide instruction for the bulk of the trust asset management courses offered in the classroom. In specialized course areas, such as the management of Indian lands, the additional services of subcontractors may be sought. UMI will enter into subcontracts with other appropriate training organizations for these specialized courses as the need arises.

M. Develop Courseware Not Available for Non-Systems Training. *This milestone, scheduled for completion September 30, 2000, was not met. A new date for the completion of this milestone is March 31, 2001.* The revised HLIP anticipated that two specialized training courses, *Introduction to Trust* and *Trust Policies and Procedures*, would be fully developed by the training contractor. This recommendation was based on information gathered by Macro International, the contractor that performed the training needs analysis revalidation in 1999. Subsequently, UMI analyzed the courseware recommendations provided by Macro and recommended appropriate modifications to these courses. The *Introduction to Trust* course has evolved into a course entitled *Trust Foundations*. The development of a *Trust Policies and Procedures* course, which would provide trust employees with the specifics of new trust policies and procedures, is not appropriate at this time, as the approval of specific new regulations for many trust functions are pending. However, a general discussion of trust policies will be incorporated into the *Trust Foundations* course.

On September 29, 2000, the outline for the curriculum of the *Trust Foundations* course was delivered to OST. This is a two-part, multi-day course that will expose students to the many job functions and responsibilities involved in responsible trust asset management, and to the interrelationships between the Department of the Interior bureau, office, and Tribal personnel who perform those functions. The first part of this course will be offered in January 2001, and the second part is scheduled to be offered in March 2001.

The complete development of this curriculum is a process that requires significant coordination between Upper Mohawk, Inc. and the relevant Department of the Interior bureaus and offices. Because the customized *Trust Foundations* course is not scheduled to be offered until early next year, the delay in the full development of this curriculum will not delay the initiation of the overall non-systems training effort.

III. Summary of Ongoing Activities:

D. Deliver TAAMS Training Consistent with TAAMS System Deployment for BIA Areas. TAAMS training is conducted in conjunction with system deployment. To date, training has been provided to all title plant staff in the Rocky Mountain, Southern Plains, Alaska and Eastern Oklahoma regions. A significant number of DataCom Sciences, Inc. employees also have been trained to work on TAAMS. Rocky Mountain Region Realty staff and a sampling of major users from around the country, have been trained on the leasing module so that they can participate in the module modification effort.

E. Provide Remedial Systems Training (TFAS and TAAMS) Where Requested. As it is requested, remedial TFAS and TAAMS training will be provided. Post-conversion follow-up training for Northwest Region OTFM staff and TFAS overview training for Northwest Region BIA and Tribal staff were completed the week of August 7, 2000.

O. Schedule and Deliver Non-Systems Training. The rollout of non-systems training courses is scheduled to begin in January 2001. The first courses to be offered will be those on various computer applications and the *Trust Foundations* course. Computer courses will be available to students online, while *Trust Foundations* will be offered in the classroom. Additional courses, including probate and customer service, will be offered in addition to *Trust Foundations* later in the year.

IV. Changes/Corrections to the HLIP or Previous Quarterly Reports:

M. To Develop Courseware Not Available for Non-Systems Training. The new date for the completion of this milestone is March 31, 2001.

(Section V. Milestone Chart starts on next page)

V. Milestone Chart for the Training Subproject
Subproject Manager: Richard Fitzgerald, OST

<u>Milestone</u>	<u>Schedule</u>
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded	
A. Schedule and Deliver Training for 105 Personnel by TFAS Contractor	07/31/98 Completed
B. Provide TFAS Systems Training in Line with Deployment	03/24/00 Completed
C. Design, Schedule and Deliver TAAMS Systems Training for Rocky Mountain Pilot	09/30/99 Completed
D. Deliver TAAMS Training Consistent with TAAMS System Deployment for BIA Areas	Ongoing
E. Provide Remedial Systems Training (TFAS and TAAMS) Where Requested	Ongoing
F. Acquire External Professional Services of Training Contractor	01/15/99 Completed
G. Obtain Training Information from Trust and Realty Employees.....	04/19/99 Completed
H. Review Draft Training Plan for Non-Systems Training	06/30/00 Completed
I. Identify/Select Training Management Contractor.....	06/30/00 Completed
J. Finalize and Approve Training Plan for Non-Systems Training	08/31/00 Completed
K. Award Contracts to Training Providers	08/31/00 Completed
L. Identify Existing Courseware to Meet Skills Gap for Other Training.....	10/31/99 Completed
M. Develop Courseware Not Available for Non-Systems Training	09/30/00 Revised to 03/31/01
N. Implement Training.....	Ongoing
O. Schedule and Deliver Non-Systems Training	Ongoing

11. INTERNAL CONTROLS

I. Statement of the Problem:

For decades, Tribes and individual Indians have voiced concerns over the Department's management and accountability for their trust funds and the overall management of natural resources.

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

II. Summary of Milestones Due this Quarter:

I. Inventory and Catalogue Internal Controls in TFAS, TAAMS and MMS. *This milestone was scheduled to be completed by August 31, 2000 and the TFAS portion of this milestone was met.* In order to more properly reflect this effort in the Milestone Chart, separate completion dates will be included for TFAS, TAAMS and MMS. Work under this milestone began in June 2000 when initial contacts were made with MMS and the Office of Trust Funds Management to arrange for inventories and commercial review results for the MMS and TFAS systems. Contacts with TAAMS program management personnel were initiated in August 2000 and work began in the Rocky Mountain Region during September and October.

An independent auditor reported a "clean opinion" on TFAS automated internal controls, therefore, the TFAS portion of this milestone is considered completed. Because the TAAMS and MMS systems development efforts are still in progress, the inventory and catalogue of internal controls covering these two components will not be completed until those systems are in place.

J. Risk Management Program Final Draft. *This milestone was scheduled to be completed by August 31, 2000. This milestone was met.* The Risk Management Program was published August 31, 2000, and an update was published September 21, 2000, that included additional graphics and statistics. The first annual plan will be published in August of 2001 for the Fiscal Year 2002.

K. Coordinate with Affected Bureaus/Offices to Develop Action Plans. *This milestone was scheduled to be completed by September 30, 2000. This milestone was met.* On September 29, 2000, the Special Trustee mailed a letter to affected bureaus and offices, initiating the coordination process. The letter transmitted the Risk Management Program document and arranged for further coordination efforts for bureau and office action plans. The Office of Trust Risk Management will continue to coordinate

with these bureaus and offices, and future progress will be reported on an on-going basis.

L. Coordinate Risk Management Program with Revised Trust Policies and Procedures. *This milestone was scheduled to be completed by October 31, 2000. This milestone was met.* Coordination with the HLIP Policies and Procedures (P&P) subproject team began in June 2000. Periodic (monthly) status updates have been established and OTRM will receive reports from the P&P subproject team on programs and activities involved in Indian trust operations throughout the Department. The Internal Controls subproject group will then review those activities to determine what formal programs currently exist for internal controls and risk assessment and identify changes necessary to ensure that risk management monitoring, review and evaluation occur. Risk management program oversight and monitoring will involve both the responsible operating program and the Internal Controls subproject. Results of these activities will be summarized in OTRM annual reports.

III. Summary of Ongoing Activities:

E. Develop Organization and Staffing Proposal for Trust Risk Offices. The OTRM was formally established in the Department Manual on September 29, 2000. Descriptions for all proposed positions were forwarded to the servicing personnel office and are currently being classified. A hiring schedule has been adopted, and the next staff addition will occur in late 2000, followed by the addition of several senior level staff in early 2001.

IV. Changes/Corrections to HLIP or Previous Quarterly Reports:

I. Inventory and Catalogue Internal Controls in TFAS, TAAMS and MMS. This milestone has been divided into three components, as progress on each system will occur on a different timetable, depending on the schedules of the systems development activities occurring in other subprojects. The MMS internal controls are anticipated to be completed in October 2001, in tandem with systems development. A timeline for the inventory and catalogue of TAAMS internal controls will be determined in coordination with the TAAMS subproject.

- 11. TFAS component.....Completed
- 12. TAAMS component.....TBD
- 13. MMS component.....10/01/2001

K. Coordinate with Affected Bureaus/Offices to Develop Action Plans. This milestone will be an ongoing task in future reports.

(Section V. Milestone Chart starts on next page)

V. Updated Milestone Chart for Internal Control Subproject
Subproject Manager: Ken Moyers, OST

Milestone	Schedule	
<i>(Milestones due or changed this report cycle are shaded)</i>		
A. Develop Inventory of Internal Control Weaknesses.....	05/29/98	Completed
B. Catalogue Relevant Audit Findings into Analysis Framework	05/29/98	Completed
C. Research and Select Template for Risk Management Program	02/12/99	Completed
D. Identify and Develop Remediation for Acute Internal Control Weaknesses.....	06/03/99	Completed
E. Develop Organization and Staffing Proposal for Trust Risk Offices	12/31/00	
F. Map Weaknesses to Current Improvement Efforts.....	04/21/00	Completed
G. Analyze Weaknesses to Determine Current Status-Resolved/Unresolved.....	05/30/00	Completed
H. Modify "Treadway" Approach to Interior Situation; Develop Monitoring Procedures	07/31/00	Completed
I. Inventory and Catalogue Internal Controls		
I1. TFAS component	08/31/00	Completed
I2. TAAMS component	TBD	Addition
I3. MMS component	10/01/01	Addition
J. Risk Management Program Final Draft.....	08/31/00	Completed
K. Coordinate with Affected Bureaus/Offices to Develop Action Plans.....	09/30/00	Completed/ Ongoing
L. Coordinate Risk Management Program with Revised Trust Policies and Procedures	10/31/00	Completed
M. Publish Final Risk Management Program Handbook	11/30/00	
N. Establish Continuing Risk Management Presence to Prevent Relapses	12/31/00	

Breaches of Trust Identified by the Court: Activity Reports

1. COLLECTION OF MISSING INFORMATION FROM OUTSIDE SOURCES

I. Objective:

This effort is designed to: 1) describe the nature and extent of IIM trust accounts since passage of the *American Indian Trust Fund Management Reform Act of 1994*; 2) present a logical approach to assess the state of documentation, information and data available and necessary for the Department of the Interior to meet its obligations under the Act; 3) identify approaches and options for gathering missing documents, information and data from third parties to supplement the Department of the Interior's present files; and, 4) commence the planning, decision process and programming of personnel and budget resources that will be necessary for the successful gathering and organization of documents, information and data from third parties.

II. Summary of Milestones Due This Quarter:

A. Acquire Project Staff and Funding. *This milestone was scheduled to be completed by October 31, 2000. This milestone date was not met. A new milestone date for the completion of this task is March 31, 2001. The Project Manager accepted another position and efforts to select a new Project Manager have been initiated. No adverse impact on the overall project however, is expected as a result because contractors were chartered to assist in project planning analyses and electronic transaction database development. Three of the six authorized positions have been filled and position descriptions for the vacant positions have been completed, submitted to the servicing personnel office, processed, rewritten and classified. In accordance with approved personnel procedures, the servicing personnel office is currently preparing vacancy advertisements with a goal of filling all three positions by March 31, 2001.*

B. Determine the Elements of an Appropriate "Accounting" for IIM Accountholders. *This milestone was scheduled to be completed by August 31, 2000. This milestone date was met. Analysis of the receipt, maintenance and distribution procedures for trust funds have been completed and workflows developed. Although all account transactions can be grouped into general categories of receipt, transfer or disbursement, specific documentation within these groups may vary depending upon the type of income being studied. For example, the documents used to process a receipt from forestry income will differ somewhat from documents establishing income from rights-of-way, farming, grazing or a commercial business transaction.*

C. Review Existing Policies for Record Retention Requirements Imposed on External Parties by Internal DOI Bureaus and Offices. *This milestone had been re-scheduled to be completed by October 31, 2000 and was completed on August 4, 2000. Department bureaus and offices were surveyed regarding established policies for requiring external or third party entities to maintain specific copies of records pertaining*

to use of, or production of, resources from real estate held in trust for American Indians. Other than the Federal Oil and Gas Royalty Management Act of 1982, which requires that records be kept by external parties for mineral operations on Indian lands, no other laws or policies were found to exist that require parties outside of DOI to retain trust records.

F. Assess Condition and Status of Documents, Information and Data in DOI's Possession. *This milestone was scheduled to be, and was, completed by September 30, 2000.* An assessment of non-electronic records was completed in December 1999 by the Bureau of Indian Affairs for predominant trust activities (see HLIP, Subproject 8-Records Management, Milestone Q, "Survey Trust Records Retention and Safeguarding"). In addition, the Office of Trust Records is implementing a records program for the BIA, and began working with the National Archives and Records Administration in an effort to improve BIA and OST records programs. OST records through FY 1999 have been, and continue to be, sent to Albuquerque for storage and management by OTR with the exception of three locations (see Chapter 1 – BIA Data Cleanup, Milestone N). In addition, OTR has initiated a dialogue with other bureaus and offices for the coordination of trust policies and procedures regarding records management throughout the Department. OST contracted with an information technologies firm to inventory current and historical electronic information maintained by OST and BIA for the period beginning October 1, 1994 to the date of conversion to TFAS. This inventory was completed September 30, 2000.

H. Decision on the Methodology of Researching Missing "Mandatory" Documents in IIM File Folders. *This milestone, scheduled for completion September 30, 2000, was not met. This task was not properly managed and a new project manager is being recruited. The new date for the completion of this milestone is March 31, 2001.* Ongoing searches for missing IIM documents reported under the OST Data cleanup subproject continue to yield positive results. Only those missing documents relating to high value accounts (unrestricted accounts with annual activity in excess of \$5,000) have been pursued. To date, about 76% (358 of 472) of these missing mandatory documents have been acquired.

Efforts underway to pursue these documents include developing an historical electronic transaction database from 1994-forward utilizing IIM transactions and lease and owner data from several legacy systems operated by the BIA. Assuming this database is successfully developed, additional missing data and documents can be identified and searched. The test phase for the electronic file development should be completed in January 2001. Utilizing the test data results, strategies for acquiring additional missing mandatory documentation can be decided and implemented.

III. Summary of Ongoing Activities:

G. Expand Collection of Missing Information, Documents and Data From 3rd Parties. During this reporting period OST, through a contractor, analyzed income types by documenting workflows, identifying transactional documents and the recipients of those documents including third party entities. As third party entities are identified, recovery procedures are being developed. OST has categorized these income types into eight general areas, examples of which follow:

	INCOME TYPE	INCOME SOURCES	EXAMPLES
1	Surface Leasing	22	Farming and grazing, general leasing, rights-of-way, revocable use permits, trespass
2	Judgments/Settlements	3	Court fines, settlements, judgments
3	Interest/Dividends	9	
4	Forestry	3	
5	Transfers	5	
6	Oil and Gas/Other Minerals	6	Coal; bonus, rental, royalty payments
7	Estates/Probates	3	
8	Miscellaneous	29	Deposits, cancelled checks (redeposited into accounts)

OST has established procedures for recovering documents for approximately 45% of the workflows. The documents to be recovered include the encumbrance instrument (i.e. the lease, permit, timber sale) as well as financial documentation. This task is scheduled for completion by the end of November 2000. When completed, the Department will know what documents are potentially held by third party entities, and will have procedures in place to gather those records.

IV. Changes/Corrections to the Project Plan or Previous Quarterly Reports:

A. Acquire Project Staff and Funding. The new milestone date for the completion of this activity is March 31, 2000.

H. Decision on the Methodology of Researching Missing “Mandatory” Documents in IIM File Folders. The new milestone date for the completion of this activity is March 31, 2001.

(Section V. Milestone Chart starts on next page)

**V. Milestone Chart for the Collection of Missing Information from Outside Sources
Subproject Manager: Vacant**

<u>Milestone</u>	<u>Schedule</u>
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded	
A. Acquire Project Staff and Funding	10/31/00 Revised to 03/31/01
B. Determine the Elements of an Appropriate “Accounting” for IIM Account Holders	08/31/00 Completed
C. Review Existing Policies for Record Retention Requirements Imposed on External Parties by Internal DOI Bureaus and Offices	10/31/00 Completed 08/04/00
D. Establish Policy on the Documents, Information and Data Required to Perform an “Accounting” in the DOI Context	07/31/00 Completed
E. Assess the Feasibility of Developing a Complete Electronic Transaction History File for IIM Accounts	07/31/00 Completed
F. Assess Condition and Status of Documents, Information and Data in DOI’s Possession	09/30/00 Completed
G. Expand Collection of Missing Information, Documents and Data from 3 rd Parties	Ongoing
H. Decision on the Methodology of Researching Missing “Mandatory” Documents in IIM File Folders	09/30/00 Revised to 3/31/01
I. Initiate a Pilot Using the Chosen Methodology for a Small Sample of IIM Accounts to Assess Effectiveness and Efficiency of Methodology	06/30/01
J. Assess Results of Pilot and Elect Course of Action for Addressing the Balance of IIM Trust Accounts	07/31/01

2. RETENTION OF IIM-RELATED TRUST DOCUMENTS

(See Report under Chapter 8: Records Management, page 39)

3. COMPUTER AND BUSINESS SYSTEMS ARCHITECTURE FRAMEWORK PLAN

I. Objective:

The objective is to provide the blueprint for defining and mapping business processes within the trust management activity from existing procedures and systems to the new operating environment.

II. Summary of Milestones Due this Quarter:

C. Enterprise Survey (Final Business Model). *This task was scheduled to be completed by September 29, 2000. This milestone date was met.* The completed business model forms the foundation for subsequent steps of the architecture planning process. In particular, the model will be a major source of information for developing the data, application, and technology architectures to be completed by November 30, 2000; January 15, 2001; and April 15, 2001 respectively. As the team completes these architectures, new perspectives may be gleaned from further analyses, reviews, and input from functional experts that require updates to the business model.

The benefit of documenting a business model is that it transcends the technology and organizational changes and focuses on systems and processes. Regardless of who performs a business activity or even what technology is used to perform it, the business activity itself does not change. Currently, the Department is modifying or re-engineering specific business processes in several areas. For example, BIA is implementing an advanced Trust Asset and Accounting Management System (TAAMS) and MMS is re-engineering its minerals revenue systems. Both approaches are based on modified off-the-shelf software, requiring some changes in business procedures. Nonetheless, the underlying business activities of collecting royalties or approving title documents are changing very little or, perhaps, not at all. Also, system upgrades, policy modifications, and other procedural changes do not all have an impact on the business activities.

It is this relative stability of the business activities, documented in the business model, which significantly contribute to the value of the entire enterprise architecture planning process. Deriving data, application, and technology architectures from a relatively stable and inter-bureau-focused business model will introduce system stability in the future and facilitate integration of systems recently implemented or scheduled for implementation in the near future.

III. Summary of Ongoing Activities: None.

IV. Changes/Corrections to the Project Plan or Previous Quarterly Reports: None.

(Section V. Milestone Chart starts on next page)

V. Milestone Chart for the Computer and Business Systems Architecture Framework Plan Breach Report
Subproject Manager: Julia Laws, PMB

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Initiate Trust Management Architecture Project		
A1. Select Planning Team to Prepare Initial Guidance on Architecture Planning	01/15/00	Completed
A2. Determine and Establish Organization to Manage Architecture	03/15/00	Completed
A3. Define Scope of Architecture Project.....	02/01/00	Completed
A4. Determine Architecture Methodology	01/18/00	Completed
A5. Gather and Review Reference Documents	02/07/00	Completed
A6. Build Electronic Library of Documents.....	03/15/00	Completed
A7. Inventory Applicable Policies and Procedures	03/28/00	Completed
A8. Develop Detailed Work Plan for Architecture Project.....	04/15/00	Completed
A9. Appoint an Overall Architecture Project Manager	02/16/00	Completed
A10. Develop Resource Requirements.....	04/15/00	Completed
B. Business Modeling (Preliminary)	08/01/00	Completed
C. Enterprise Survey (Final Business Model).....	09/29/00	Completed
D. Current Systems & Technology	07/01/00	Completed
E. Data Architecture.....	11/30/00	
F. Applications Architecture.....	01/15/01	
G. Technology Architecture	04/15/01	
H. Implementation Plan	06/01/01	
I. Planning Conclusions – Final Report.....	08/15/01	
J. Transition to Implementation.....	TBD	

4. **WORKFORCE PLANNING**

I. **Objective:**

The objectives of this plan are: 1) to ensure adequate staffing requirements and associated funding are reflected in the budget development process to meet the full personnel needs of trust management business functions consistent with statutory requirements; and 2) to ensure workforce planning is done in a timely fashion and that there is consistency, where appropriate, among the organizations.

II. **Summary of Milestones Due this Quarter:**

I. Current/Future State: Initial Projection of Workforce Needs for FY 2002 Budget Based Upon Analysis of Present Workforce and Develop Budget

Recommendations: *This milestone was scheduled to be completed by October 1, 2000. This milestone date was met.* In the report completed on May 31, 2000, the contractor, Macro International Inc., provided its initial workforce models and furnished projected staffing requirements related to the Office of Hearings and Appeals and Bureau of Indian Affairs Probate activities, and to BIA Trust Management activities.

For OHA probate, the Macro report supported the process improvements and workforce requirements documented in the "Indian Probate Reinvention Lab, Phase II Final Report". OHA reviewed and confirmed the report's workforce planning information and recommendations.

For the OHA probate Fiscal Year (FY) 2002 budget submission, OHA applied the workforce planning information from the report in determining resources needed to support the OHA probate workforce structure, skills, and staffing requirements. In accordance with Milestone J, the OHA probate FY 2002 budget submission is being examined.

The Macro report's assessment of BIA's probate processes and staffing requirements focused almost entirely on probate backlogs. While the report projected in-house staffing requirements to handle the backlog, the BIA decided to accomplish the backlog reduction using contracted contingency workers. The BIA internally developed additional staffing information for managing the current probate functions and workload, which was used with the report's information for their FY 2002 budget development. In accordance with Milestone J, the FY 2002 budget submission for BIA probate is being examined.

For other BIA trust management activities, the Macro report also provided an initial assessment and profile of BIA employees engaged in these activities by documenting positions, retirement eligibility, and employee workloads. However, the contractor was unable to provide specific staffing projections with the limited survey data collected during the first contract period. For its FY 2002 budget submission for non-probate trust management activities, the BIA coupled the report's workforce planning, information and profiles with its assessment of organizational goals and program demands. In accordance with Milestone J, the FY 2002 budget submission is being examined.

As reported in the *Third Quarterly Report*, the contractor was unable to develop workforce models and furnish projected staffing requirements for the Bureau of Land Management because historical workforce and workload metrics for BLM were not readily available during the contractual period. Since the report, the BLM has implemented a system to track accomplishment of trust management activities by its workforce. In the next contractual effort, the contractor is also being tasked to collect survey data and analyze BLM's trust management workforce and workload and specify skills and staff required to successfully accomplish organizational objectives.

III. Summary of Ongoing Activities:

A second contract is being prepared to provide a more intensive survey of employees within BIA and BLM. OHA will not be surveyed, as a workforce plan already exists for FY 2003. Additionally, this contract will provide a survey and assessment for the Office of Trust Funds Management and for Tribal compact and contract workers. This contract will assist in further delineating current workforce needs and identifying budget requirements as listed in Milestone M.

IV. Changes/Corrections to the Project Plan or Previous Quarterly Reports: None.

(Section V. Milestone Chart starts on next page)

**V. Milestone Chart for the Workforce Planning Breach Report
Project Manager: Carolyn Cohen, PMB**

<u>Milestone</u>	<u>Schedule</u>	
Milestones due or changed this report cycle (08/01/00 – 10/31/00) are shaded		
A. Conduct Preliminary Workforce Planning Review in Trust Management Organizations and Determine Workforce Planning Requirements and Schedule	02/29/00	Completed
B. Develop Statement of Work and Provide to Contractor.....	03/13/00	Completed
C. Award Contract.....	03/20/00	Completed
D. Designate Workforce Planning Project Manager and Bureau/Office Planning Team Members	03/20/00	Completed
E. Provide Bureau/Office Workforce Planning Instructions.....	03/20/00	Completed
F. Bureau/Office Kick-off Meetings with Contractor	03/24/00	Completed
For FY 2002 Planning Activities		
G. Strategic Planning: Validate and/or Update Existing Workforce Plans and/or Initiate Process for Developing Detailed Workforce Plans	06/01/00	Completed
H. Scan Environment: Analyze Workforce Competencies	04/30/00	Completed
I. Current/Future State: Initial Projection of Workforce Needs for FY 2002 Budget Based upon Analysis of Present Workforce, and Develop Budget Recommendations	10/01/00	Completed
J. Examine Contractor and Bureau/Office FY 2002 Budget Recommendations for Submission to OMB, OST/Departmental Budget Office, Refine Recommendations Based on Feedback from OST and OMB.....	02/01/01	
For FY 2003 Planning Activities ¹		
K. Forecast Future: Examine Organizational Objectives and Identify Workforce Competencies Needed to Achieve Them.....	01/31/01	
L. Hire Personnel in Accordance with FY 2001 Budgets Appropriated by Congress, Consistent with Existing Workforce Plans	09/30/01	
M. Identify Competency Gaps and Surpluses Based on FY 2001 Appropriations from Congress	03/31/01	
N. Develop Plan to Transition from Workforce per the FY 2001 Enacted Budget to Future Workforce	05/31/01	
O. Develop Budget Recommendations to Reflect Efficiencies or Further Requirements Identified through Business Process Reengineering and Needed Improvements Based on Other Trust-Related Activities.....	07/01/01	
P. Examine Contractor and Bureau/Office FY 2003 Budget Recommendations for Submission to OMB, OST/Departmental Budget Office, Refine Recommendations Based on Feedback from OST and OMB.....	02/01/02	
Q. Implement Transition Plan Based on Appropriations Obtained from Congress for FY 2002, Monitor Effectiveness and Success	10/01/01	

¹Repeat cycle, if necessary, each year

APPENDIX A – PRE AND POST DEPLOYMENT DATA CLEANUP TASKS: DESCRIPTIONS

100N Number - In the past, the BIA assigned 100N Numbers to lineal descendants of enrolled members who did not formerly meet the criteria to become enrolled members. This task involves the identification of all ID numbers associated with any individual who currently has a 100N number assigned and to successfully change all alias ID numbers to one ten-digit, Tribal ID Number.

Administrative Modification Encoding - This task entails encoding a backlog of administrative modifications previously not entered into the system of record.

Backlog (Document Processing) - This task involves the preparation, encoding, and documentation of the Land Title and Records Office document backlog.

Backlog (Global Requests from Agencies) - The purpose of this task is to assist the BIA with encoding a backlog of requests for global changes in the system of record.

Backlog (Recordation of PSFO Documents) - The purpose of this task is to assist the BIA by encoding a backlog of documents into the LRIS recordation module. This task entails assigning document numbers, recording the documents into the LRIS recordation module, and microfilming the documents.

BIA Assigned Administrative Probate Modifications - The purpose of this task is to assist the BIA by processing a backlog of enrollment verifications that require administrative modifications.

Current Agency Global Requests - The purpose of this task is to assist the BIA with encoding current requests for global changes in the system of record.

Fee Owner ID Task - The purpose of this task is to identify non-Indians who have inherited land interests. Once these individuals are identified, research is done to locate an existing identification number and verify its correctness. If no identification number is located, a number is then assigned.

IIM ID Match - This task pertains to the verification of ownership information between IIM accounts and the Integrated Records Management System.

Lease Owner Inquiry - The purpose of this task is to determine distribution by comparing LRIS and IRMS reports with the decedent's probate.

Legal Land Description Cleanup (Metes and Bounds Task) - The purpose of this task is to locate the original documents that describe a tract's land description and determine if this document is feasible for scanning into the TAAMS database. A "Godzilla" report will determine all tracts and documents.

Multiple Owner ID Task - The primary purpose of the Multiple Owner Identification Task is to determine the correct identification number for several individuals identified as *anomalies* in the BIA Land Record Information System and Integrated Record Management System. The individuals on these *anomaly lists* have land interests in these systems under more than one ID

number. Once the correct number is determined, personnel update the systems to coincide with hard-copy land title documents and records.

Non-Enrolled ID Number - The purpose of this task relates to the ID numbers of several individuals containing an alpha code of "N" which indicates that the individuals are non-enrolled. The primary purpose of this project is to determine if these individuals have enrolled since the issuance of the ID number containing the "N" alpha code. In most instances, this will require agency verification.

Payment File Verification - This task entails the verification of the legal descriptions and tract numbers from Realty Modules and hardcopy records at the agency/field offices against data in the Lands Record Information System. Once personnel verify the tract numbers and legal descriptions, they verify all ownership as well.

Title Tract Match - This task pertains to the verification of legal descriptions between the LRIS and IRMS.

Note: The following tasks pertain only to the Alaska Region:

Title Examination Task- This process involves understanding all documents found in the tract folder, researching the Alaska Title Service Center (ATSC) databases, extracting LRIS reports, and reviewing the Alaska Land Information System (ALIS) website for information relevant to that particular tract being examined. Personnel bring all of this information together to create an accurate land description, ownership, conveyance of ownership, and history of the tract before encoding into TAAMS. Once the examiners research these documents and extract the appropriate title information from its sources, the examiner uses a form called a "chain sheet" to record the title information. ATSC has requested that the BIA Data Cleanup project provide them with complete accurate chain sheets.

Chain Sheet Review Task - Data cleanup personnel perform an internal quality check of the work placed on the chain sheet before encoding and sending to ATSC. The reviewer analyzes the original file documents and researches documents to determine if the information on the sheet is accurate and acceptable for the next task. If it is not accepted, the reviewer returns it for further examination.

TAAMS Encoding Task - Personnel encode title and conveyance information located on the chain sheet to the appropriate TAAMS modules to build individual tract and conveyance history.

TAAMS Review Task - This task is also an internal quality check put in place to assure that the information encoded into TAAMS is accurate and to ensure compliance with all standards before the BIA reviews the encoded tracts.

Note: The following tasks pertain only to the Eastern Region:

Document Acquisition/Inventory Task - The purpose of this task is to review files to locate legal land documents, record for record retention purposes, and determine what information is missing on behalf of each Tribe under the jurisdiction of the Eastern Region. Once personnel identify, review, tag, inventory, classify, and encode these documents into a DataCom database, they duplicate the documents for verification of the classification given to each record.

Microfiche Inventory Task - The purpose of this task is to inventory microfiche files and verify the documents contained in each file.

TAAMS Information Migration Evaluation Task (TIME) - The purpose of the TIME Task is to compare original title documents to data housed in LRIS and TAAMS for pre and post conversion statistical assessments. Document samples are randomly derived from LRIS and scanned by on-site cleanup personnel for centralized review and comparison by independent assessors located in Albuquerque. Samples are based on 100 individually selected tracts by region, and predetermined percentage of total documentation contained in LRIS.