



4.3.3 Beneficiary Services (B)

4.3.3.1 Beneficiary Services Summary Process Description

The overall process starts with:Request information, technical assistance or services.It ends with:Issue response.

Beneficiary Services was established as one of the eight core Trust business processes to emphasize its importance in the delivery of Trust services to beneficiaries. Therefore, the As-Is Trust business model for the Beneficiary Services process documents how and where beneficiaries are currently being communicated with and responded to when there is direct contact between the beneficiary and a servicing office or an indirect contact via 3rd party requests. The term beneficiary refers to an individual Indian, Alaskan Native or a Tribe.

Beneficiary Services is defined as communicating and interacting with Indian beneficiaries and other requestors while ensuring that accurate information; assistance and services are provided in a timely manner. Receiving a request, formulating a response and issuing the response is imbedded in each of the other seven core Trust business processes at a variety of locations (touch points) as illustrated by the diagram in Section 4.3.3.1.2. Regardless of where in the overall Indian Trust process there is beneficiary contact, any beneficiary contact is considered a part of Beneficiary Services. Therefore, Beneficiary Services is not considered a stand-alone process, but rather, it is an integral part of the other seven Trust business processes.

A beneficiary or requestor usually makes direct contact with a servicing office to make a request for information, technical assistance or services. The vast majority of the time, the servicing office is the BIA, OST/OTFM, MMS, OHA or a Tribe. Occasionally, direct beneficiary contact may be initiated by the beneficiary providing information to the servicing office. In these cases the beneficiary is updating their account information. In addition to receiving requests from beneficiaries, servicing offices may also receive requests for information from 3rd party requestors, attorneys, contractors, leasing agents, non-Indian interests in Trust lands, or government entities at the local, county, state and federal levels.

A beneficiary or requestor makes direct contact with a servicing office through a telephone call, facsimile, letter, email or a personal visit. Although beneficiary requests may span a wide variety of subjects, most requests or inquiries are related to land management transactions or accounting transactions.

After the request is received by the servicing office, the nature and subject matter of the request is then assessed. During the initial assessment of the request the servicing office makes a determination to either decline the request, act upon the request or forward the request to another, more appropriate organization for action. Often, the servicing office will obtain a response for the beneficiary or requestor even though the request is external to the Trust and related activities. A request is only declined if the party making the request cannot verify or validate their identity or authorization to receive Trust information.





The servicing office acts upon a request by performing a technical evaluation of the request, gathering any information required for servicing the request and formulating a response. Fulfilling a request may be as straightforward and immediate as looking up account information in one of the Trust systems or it may be a query that triggers many subsequent operations to produce a report. When a serving office assumes total responsibility for providing a response to a request, the servicing office may need to obtain information or the requested product from one of the other seven business processes.

After technical evaluation and some information gathering, a request may have to be completely forwarded to another servicing office or process for action. In these cases, the servicing office that originally received the request sometimes follows up on or tracks the request to be sure a response was issued to the beneficiary or requestor. Tracking of requests is mostly dependent upon the type and nature of the request. Tracking is usually performed for the more complex request, whereas requests answered over the telephone may not be tracked.

Either the servicing office that received the request, or the servicing office that the request was forwarded to, will issue a response to the beneficiary or the requestor. The issued response may be a simple yes or no answer, an account balance or a detailed Trust information product such as a report, map, survey or financial statement. Before delivering confidential information to a 3rd party requestor, verification is made that the requestor is authorized to receive the information.





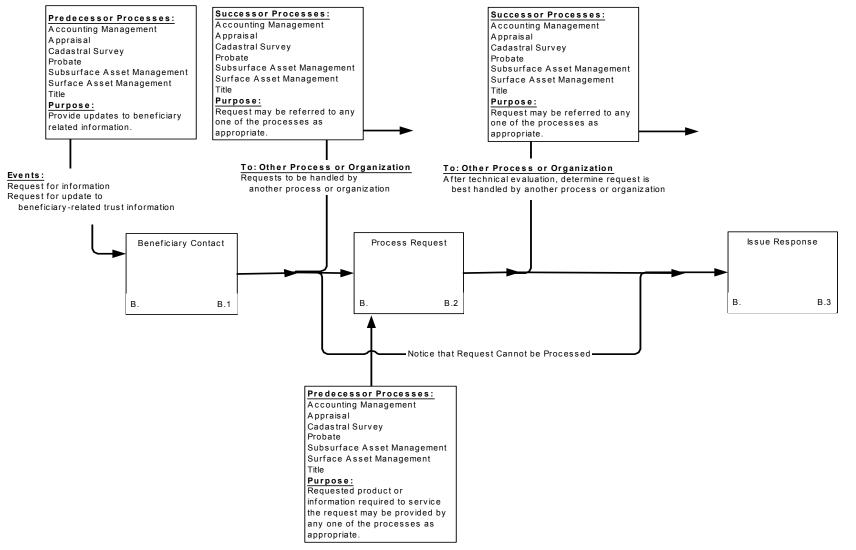


Figure 4.3.3-1 Beneficiary Services High Level Diagram





Beneficiary Services Objectives

The overall vision for a beneficiary-centric focus on the delivery of Trust services will help achieve the Trust's fiduciary responsibilities, Executive Orders, Secretarial Orders, Secretary's Trust Principles and other legal requirements. In addition, the mission statements followed by the Department, and Tribes are more likely to be achieved by this focus.

The resulting objective is to achieve beneficiary satisfaction and to build beneficiary confidence that the Department has their best interest at heart when executing Trust-related activities. To fulfill this objective, beneficiary services will be guided by the department's strategic business goals and objectives, which set the direction for the formal implementation of Beneficiary Services.

The following table provides the strategic goals and objectives that are related directly to Beneficiary Services. These goals and objectives are taken from the *Comprehensive Trust Management Plan* as presented in Chapter 1.

a) Strategic Goal 1 - Beneficiary Services

Enhance and maintain a beneficiary focus of providing service to and maintaining communications with beneficiaries.

Objective 1.1 Beneficiary Statements

Routinely provide timely, accurate, understandable, and comprehensive statements to beneficiaries.

Objective 1.2 Beneficiary Services

Provide beneficiaries with easy access to Trust account services and information.

Objective 1.3 Beneficiary Communications

Develop and maintain effective communications with beneficiaries to facilitate beneficiary involvement in improving Trust management, acquisition / disposal, and conveyances of Trust assets, consistent with DOI's fiduciary duties.

b) Strategic Goal 2 - Ownership Information

Verify, track, and maintain the land, natural resource, and fund asset ownership information required to manage assets effectively and to provide beneficiary services.

Objective 2.3 Title, Realty, and Administrative Information

Develop, maintain, and make readily available accurate and current asset ownership and administrative information that is managed to professional fiduciary standards.

c) Strategic Goal 6 - Administrative Services

Develop, maintain, and coordinate administrative services to support the effective and efficient fulfillment of DOI Trust management responsibilities.

Objective 6.6 Business Practices

Develop and maintain business processes and practices that are based on professional standards that are complete, consistent, and reliable.





Objective 6.7 Performance Measures

Develop, maintain, and use clear performance measures to manage Trust operations and to assess performance.





4.3.3.2 Beneficiary Contact (B.1)

Starts with: Receive a verbal or written request.

Ends with: Document request, note that request cannot be serviced or refer request to another process or organization.

A beneficiary, 3rd party requestor or a DOI/BIA internal organization may initiate a beneficiary-related request. Requests are made to different servicing offices, including Tribes. Usually requests are made to those servicing offices the requestor has access to, regardless of location or function; or to a servicing office, with which he/she has had previous contact.

The beneficiary may make contact with the servicing office via telephone call, office visit, email, letter or FAX. When office visits are made, the beneficiary may travel in groups and each individual may bring with them a variety of requests or issues. In addition, direct beneficiary contact takes place through those servicing offices that have formal outreach programs that include scheduled meetings and providing information at public events, such as Pow-Wows. During these face-to-face meetings, servicing offices staff provide information and answers to questions.

The request may be for specific information, an update to beneficiary-related Trust information, technical assistance, a service or decision. After the request is received, the receiving office makes a determination on whether or not to document the request. Documentation in any manual or automated tracking system depends upon the nature of the request. Not all requests that are processed are tracked until a response is issued.

Upon receipt of a request, the servicing office performs an assessment of the nature and conditions of the request. An understanding of the request allows the staff person to make a decision as to how the request can be accommodated in a timely manner, as well as who is most appropriate to provide the service.

The assessment also includes identifying whether or not the request is for confidential information, which may require proof of the requestor's identity and confirmation of the requestor's entitlement to the information. A release of information signature is obtained, as necessary, to release information to a 3rd party. The request is declined if the proof of identity cannot be obtained or if release of information is prohibited.

Note: The Indian Land Consolidation Act (ILCA) Amendments will allow the release of some Trust data/records to 3^{rd} parties, which was previously protected by the Privacy Act. For example, names and addresses may be provided to potential lessees.

After the request is assessed, and any required proof of identity is obtained, it is either acted upon or forwarded to another process or organization for action.





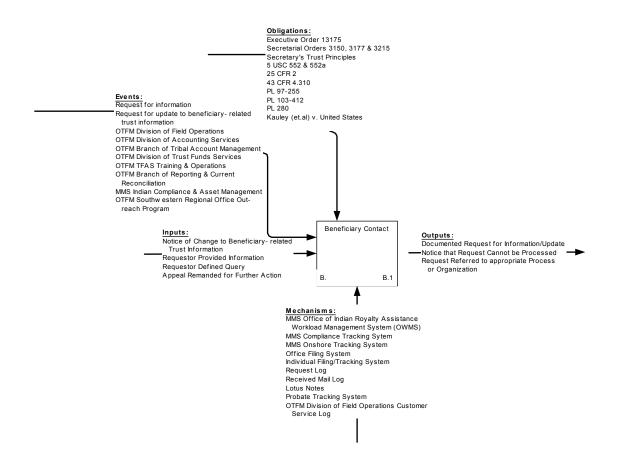


Figure 4.3.3- 2 Beneficiary Contact IDEF (0)





Beneficiary Involvement for Beneficiary Contact

Beneficiaries generally initiate this process. Beneficiaries usually call a servicing office that they have a telephone number for, even if it is not the appropriate office. Beneficiaries prefer face-to-face contact and immediate answers. When beneficiaries do travel to a servicing office they often bring in several issues in one visit.

Beneficiaries also have the opportunity to initiate direct, face-to-face, contact when servicing office staff attends meetings with Tribal Councils, Land Boards, Farm Boards, Grazing Committees, Land Associations, Tribal Districts, Tribal Chairman's Associations and Soil and Water Conservation Districts. In addition, servicing offices with outreach programs make direct beneficiary contact at Tribal investment meetings, mandated meetings with Indian mineral owners, scheduled outreach meetings, per-capita payouts, Pow-Wows and other public events.

Servicing offices, including Tribes, use local radio stations and Tribal Newspapers to provide Trust-related notices and information to beneficiaries. The media is also used to publicize upcoming outreach events in the hopes of encouraging Indian attendance. Often, the OST/OTFM Central, Regional, Agency and Division Field Services Offices publishes notices in the Tribal newspapers concerning events, deadlines and whereabouts unknown.

When beneficiaries do contact a servicing office, for confidential or account related information, they should be able to validate their identity by providing required identity information.

Beneficiary Contact Significant Notes

- a) Inquiries are received from non-beneficiaries. For example, Congressional inquires may be received if one of their constituents (beneficiary or non-beneficiary) contacts them about being dissatisfied with services provided by DOI.
- b) Several of the regions have constraints, which creates a challenge for direct beneficiary contact. For example:
 - Many of the Navajo beneficiaries live in rural areas without access to telephone and electrical accommodations. Due to the size of the Navajo Reservation and the location of servicing offices, these Navajo beneficiaries must travel long distances to obtain answers to questions and receive services from DOI offices i.e., BIA Offices, OST/OTFM and FIMO. The distance is sometimes a hardship for the beneficiary and delays the provision of services particularly when beneficiary follow-up is required. In addition, the distances between DOI offices can delay the provision of services when documents have to be forwarded for approval by the delegated authority in another distant location.
 - 2. Due to the size of the geographic area being served by a BIA Agency in California, a beneficiary may be required to travel up to 1½ days to reach the agency. For example, the Central California Agency serves an area of 1200 square miles in size. Beneficiaries arrive at the agencies in groups and each individual usually has several issues or program related questions.





- 3. In Alaska, beneficiary contact is limited by seasonal conditions and conflicts with subsistence activities. For example, surveys need to be performed during the summer months, which is the same time that subsistence activities are conducted.
- c) Midwest beneficiaries prefer telephone contact due to the long travel distances and seasonal inclement weather within the region.





4.3.3.3 Process Request (B.2)

Starts with: Document request or informal request. Ends with: Formulate response, updated beneficiary Trust-related information or request referred to another process or organization.

Sometimes the servicing office staff can respond to an inquiry immediately. For example, if the inquiry is from a beneficiary requesting the date of an upcoming IIM distribution and the servicing office staff knows the distribution date; then the inquiry can be answered immediately. However, most requests and inquiries are more complex. In these cases, the appropriate staff in the receiving office performs a technical evaluation of the request, conducts research, gathers the information required to fulfill the request and formulates a response.

During the technical evaluation, the servicing office may not have the expertise or necessary information to completely service the request. In some cases, the request may be referred to another process or organization and in other cases; the servicing office may request the required information or product from another process.





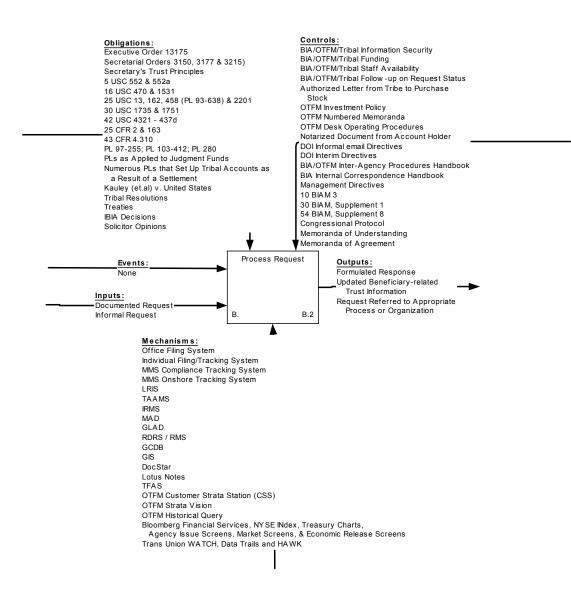


Figure 4.3.3- 3 Process Request IDEF (0)





Beneficiary Involvement for Process Request

For walk-in and telephone requests that can be responded to immediately, the beneficiaries are involved in the entire process.

For all other requests, the servicing office may be in frequent contact with the beneficiaries to follow up, obtain additional information and signatures. Beneficiaries often receive an update on requests that are not immediately resolved.

In addition to formally responding to beneficiary requests, servicing offices staff have an informal opportunity to address beneficiary inquiries during various meetings with Tribal Councils, Land Boards, Farm Boards, Grazing Committees, Land Associations, Tribal Districts, Tribal Chairman's Associations and Soil and Water Conservation Districts.

Servicing offices with outreach programs make direct beneficiary contact at Tribal investment meetings, mandated meetings with Indian mineral owners, scheduled outreach meetings, per-capita payouts, Pow-Wows and other public events. The outreach activities allow servicing office staff the opportunity to update Trust-related information and respond immediately to beneficiary requests.

Process Request Significant Notes

- a) Background checks for access to the computer systems are taking too long and prohibiting staff from using the systems to deliver services to the beneficiaries.
- b) DOI personnel must be culturally conscious in conducting business with all beneficiaries.
- c) When the request is handed-off to an organization outside BIA or OST/OTFM for response, BIA or OST/OTFM staff have little control over when or if a response is issued.
- d) Beneficiaries do not always realize that BIA and OST/OTFM are different entities.
- e) Making updates/revisions to operational manuals and procedures is backlogged. Therefore, staff personnel are working with outdated and/or incomplete manuals and procedures.





4.3.3.4 Issue Response (B.3)

Starts with: Formulate response or note that request cannot be processed. Ends with: Issue response, provide advice, explain why request was disapproved or explain why request was referred to another process or organization.

The servicing office that receives the request will deliver the formulated response to the beneficiary/requestor. A response may be providing a simple "yes" or "no" or it may be presenting a detailed explanation of the requested information. A response may be the provision of technical assistance or a service. Responses may also include providing Trust-related documentation (such as maps, surveys, financial statements, fee-to-Trust, etc), or advice.

Before delivering confidential information to a 3rd party, verification is made that a release of information signature from the appropriate person is on file.

The process used by OST/OTFM to verify caller identity includes checking the caller's social security number, date of birth, full name and account number. In cases where a "power of attorney" is used, OST/OTFM requires the original document or a certified copy of the original. A change of address requires that the document be properly notarized or witnessed by a DOI employee.





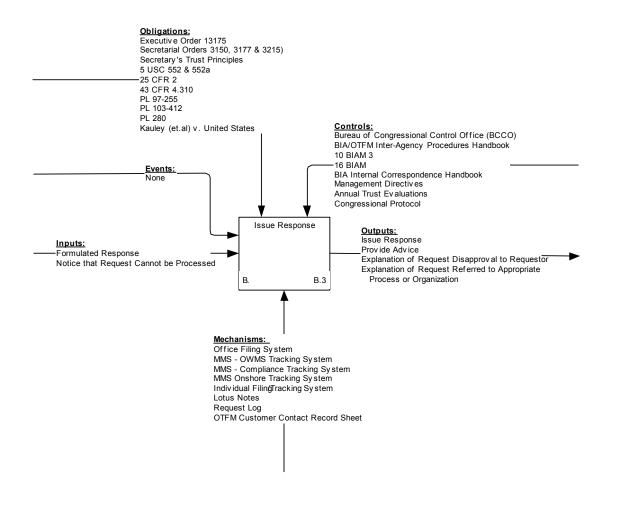


Figure 4.3.3- 4 Issue Response IDEF (0)





Beneficiary Involvement for Issue Response

Beneficiaries receive the response to their request and have the opportunity to provide feedback to the servicing office. In addition, the beneficiaries can appeal decisions of DOI Line Officials.

Issue Response Significant Notes

- a) Delegation of authority is inconsistent across the regions. Many workshop participants expressed that authority delegation should be to the lowest field level within the BIA.
- b) Most participants agreed that it would be good to survey beneficiary satisfaction after completing request, but there is a concern as to how this could be accomplished with already limited resources.





4.3.3.5 Beneficiary Services Variances By Region

The following variances are based upon the information provided by the participants at the work sessions. In many cases, participants did not represent all functional areas of the Indian Trust. Therefore, the variances are not necessarily all-inclusive and may represent the participants' perceptions of the functions being performed.

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Great Plains Region	Mechanism	Internal database is used to track ongoing requests. Used by one branch of the Regional Office.	Procedural	Minimal	Low	Minor
Turtle Mountain Agency Fort Totten Agency	Output	Logs for walk-in or telephone calls are not maintained. In addition, there are not any sign-in logs or chronological files.	Procedural	Lack of recording and tracking logs prohibits follow up and assurance that a response was delivered.	High	Minor
Turtle Mountain Agency Fort Totten Agency	Control	Some requests, such as leasing require the requestor's signature.	Procedural	The requirement to obtain the requestor's signature may delay processing the response or service.	High	Medium

Table 4.3.3-1 Great Plains Region Beneficiary Services Variance Table

 Table 4.3.3- 2 Midwest Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Midwest Region	Role	BIA Regional Office provides services directly to those Tribes that are not serviced by an Agency.	Organization	Increases Regional Office workload.	Medium	Major

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Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Midwest Region	Role	The regional and agency staff perceives themselves as public service providers, since they address other than Trust requests.	Procedural	Providing responses to non- Trust-related requests detracts from providing Trust-related services.	High	Minor
Midwest Region	Role	The Inter-Agency Team operates under a Memorandum of Understanding and coordinates the responses to Tribal requests.	Procedural	The Memorandum of Understanding sets direction for the delivery of Trust services and therefore, enhances the provision of services.	High	Major
Midwest Region	Mechanism	Word Perfect and Quattro are used for information gathering.	Procedural	Multiple applications add to the complexity of the computing environment.	Medium	Minor
Minnesota Agency	Mechanism	Timber Sales Accounting/Operations Inventory (TSA/OPIN)	Procedural	Used to support forestry projects.	Medium	Medium

 Table 4.3.3- 3 Eastern Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
None						





Table 4.3.3- 4 Alaska Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Central Council Tlingit & Haida Indian Tribes of Alasksa	Role	Service provider is a one person office serving 11 communities. A 1-800 telephone number allows beneficiaries to call in requests and inquiries.	Procedural	Improves beneficiary satisfaction	High	Major
Central Council Tlingit & Haida Indian Tribes of Alasksa	Input	The lack of personnel and funding, limits the services and assistance that can be provided.	Compact Funding	The service provider can only assist Natives from the Compacting communities they serve.	High	Major
Central Council Tlingit & Haida Indian Tribes of Alasksa	Input	Outreach is conducted through public meetings.	Procedural	Improves beneficiary satisfaction	High	Major
Central Council Tlingit & Haida Indian Tribes of Alasksa	Role	Checklists are used to identify items or issues which can be resolved during walk-in visits.	Procedural	Improves beneficiary satisfaction by saving them a future visit.	High	Major
Alaska Region	Roles Location Inputs	The Alaska Region uses a service provider, rather than BIA Agency or Field Office staff, when Bureau Programs are compacted or contracted. Service providers include Compacted or Contracted Tribal Offices or Tribal consortiums. The service provider services allottee and Tribal requests, as well as provides outreach activities during native village meetings. BIA	Compacting and contracting of Trust programs	Ensures that the Trust services are provided to allottees and Tribes. BIA Field Offices and the Alaska Regional Office are the backup service providers.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		Agency/Field Office or the Alaska Regional Office previously performed these services. Service providers maintain records for Trust asset transactions related to allotments, gift deeds, probates, sales, leases, permits, wills, rights-of-ways, IIM accounts, town sites and sub- divisions.				
Alaska Region	Role	The Compact Coordinator coordinates with the Field Representative and Compacted Tribes on compact matters and assists the Office of Self- Governance with negotiations.	Compacting of Trust programs.	Fulfills DOI's self- governance objective.	High	Minor
Alaska Region	Role	The Tribal Operations Officer is located in the Alaska Regional Office and coordinates with the Field Representative and 638 Contracted Tribes on Tribal operations matters.	Contracting of Trust programs	Fulfills DOI's self- determination objective.	High	Minor
Alaska Region Fairbanks Field Office	Control	Environmental conditions, such as extreme high tides, affect outreach programs for the personal delivery of beneficiary services. In addition, beneficiary contact is limited by seasonal conditions and conflicts with subsistence activities. For	Environmental conditions	Negative affect on the ability to make contact with beneficiaries and deliver services.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		example, surveys need to be performed during the summer months, which is the same time that subsistence activities are conducted.				
Alaska Region	Obligation	Alaska National Interest Lands and Conservation Act (ANILCA) of 1981, Section 907. Recognizes subsistence rights of Alaska Natives.	Federal Law	Affects conveyance of land from BLM to allottee. After conveyance, the BIA assumes Trust responsibility.	High	Major
Alaska Region	Obligation	General Allotment Act of 1906. Allows for the granting of parcels of reservation land to individual Indians.	Federal Law	Affects conveyance of land from BLM to allottee. After conveyance, the BIA assumes Trust responsibility.	High	Major
Alaska Region	Obligation	Alaska Native Claims Settlement Act (ANCSA) Allows Alaska Natives to file claims for subsistence lands.	Federal Law	Affects conveyance of land from BLM to allottee. After conveyance, the BIA assumes Trust responsibility.	High	Major
Alaska Region	Obligation	Town Site Act	Federal Law	Affects conveyance of land from BLM to allottee. After conveyance, the BIA assumes Trust responsibility.	High	Major
Alaska Region	Obligation	Vietnam Veterans Allotment	Federal Law	Affects conveyance of land from BLM to allottee. After	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
				conveyance, the BIA assumes Trust responsibility.		
Alaska Region	Organization	Alaska Legal Services Corporation is non-profit and is contracted by BIA to handle appeals and administrative hearings concerning allotments.	Need for Alaska Natives to pursue litigation and assert rights	Ensures that the Trust services are provided to the allottees.	High	Minor
Alaska Region	Obligation	ILCA is not applicable to the Alaska Region.	Not applicable to Alaska Region	Minimal	Low	Minor
Alaska Region	Location	Alaska Probate Title Services Center (APTSC) replaces the LTRO/TSO and performs the services that were previously performed by the LTRO/TSO.	Organization	Minimal	Low	Minor
Alaska Region	Organization Location	The Office of Self-Governance (OSG) accommodates beneficiary requests from compacted Tribes or Tribes pursuing compacted status and serves as the primary negotiator when Tribes compact programs.	OSG is not in all BIA regions	Serves as point of contact for Tribes compacting programs and fulfils DOI's self-governance objectives.	High	Minor
Alaska Region	Role	The Regional Solicitor, rather than the Field Solicitor, represents BIA in appeals and other federal action. He/she renders opinions by interpreting	Procedural	Minimal	Low	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		law on specific issues, concurs with decision to deny access to records and reviews schedule of changes incurred by FOIA.				
Alaska Region	Input	In Alaska, the beneficiary/requestor includes: individual Indians awaiting allottee status, allottees, Tribes, Native Corporations, general public and trespassers on allotted lands.	Procedural	The variety of requestors increases the workloads for realty, probate, title, enrollment, cultural resources management and rights protection.	High	Major
Alaska Region	Organization	There are no agencies and only one branch chief (Fairbanks) in the Alaska Field Offices due to their small size.	Procedural	Increases beneficiary reliance on service providers.	High	Major
Alaska Region	Mechanism	IBLA Records System is an internal mechanism used in the conduct of beneficiary services.	Procedural	Minimal	Low	Major
Alaska Region	Mechanism	The State of Alaska Vital Records System and the State of Alaska Recording System are external mechanisms used in the conduct of beneficiary services.	Procedural	Minimal	Low	Major
Alaska Region	Control	Annual Case Load Report from BIA Alaska Regional Realty Office provides status for activities, including backlogs.	Procedural	Provides annual snapshot of the realty workload and helps to ensure the timely delivery of services.	High	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Alaska Region	Mechanism	Alaska Department of Natural Resources land status database.	Procedural	Supports the correct conveyance of land.	High	Major
Alaska Region	Mechanism	Federal Financial System	Procedural	Contains information on non-Trust funding and budget reference.	Medium	Major

Table 4.3.3- 5 Northwest Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Confederated Salish and Kootenai Tribes	Input	Committee participation is a medium for outreach within and outside of the community.	Procedural	Participation on a committee is an opportunity for providing program information, identifying community needs and making decisions.	High	Major
Confederated Salish and Kootenai Tribes	Mechanism	Tribal Land Department publishes notices and important information in their newsletters and on the Tribal web-site.	Procedural	Improves beneficiary satisfaction	High	Minor
Confederated Salish and Kootenai Tribes	Role	Tribal Public Relation Officer reports Tribal and community events on Tribal web-site and on local radio stations.	Procedural	Effective in building the public image of the Tribe and providing information to the community.	High	Minor
Confederated Salish and	Mechanism	Questionnaires are used to obtain	Procedural	There is a 5% response rate.	Medium	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Kootenai Tribes		community perspectives on Tribal plans etc.				
Confederated Salish and Kootenai Tribes	Control	Tribal Council passes a resolution to adopt OST/OTFM procedures	Compact procedure	Standardized procedures	High	Major
Confederated Salish and Kootenai Tribes	Role	IIM Accounting Office staff respond to all accountholder inquiries regardless of subject matter.	Procedural	Improves beneficiary satisfaction	High	Minor
Confederated Salish and Kootenai Tribes	Control	Even though the IIM Accounting Office has a formal identity verification procedure; if they know the beneficiary, verification will not be asked for.	Procedural	Minimal	Low	Minor
Confederated Salish and Kootenai Tribes	Control	If a beneficiary does not respond to a request for information after three inquiries, (letters), the IIM Accounting Office adds the beneficiary to the where-abouts- unknown list.	Procedural	Expands the where-abouts- unknown problem.	High	Minor
Confederated Salish and Kootenai Tribes	Input	The natural resource base and the number of people competing for the same resources, both on and off the reservation, affect the Compacted programs.	Procedural	Impacts resources and the delivery of services.	High	Major
Confederated Salish and Kootenai Tribes	Mechanism	TFAS access is restricted to the account of Tribal members only.	Procedural	Cannot provide services to accountholders from another Tribe.	High	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Confederated Salish and Kootenai Tribes	Role	The lack of frontline staff disrupts the normal workload of specialists working in the Tribal Departments.	Procedural	The Tribal budgets for compacted programs do not cover the manpower required to respond to daily beneficiary requests.	High	Major
Suquamish Tribe	Role	The Suquamish Tribe Natural Resources Department has an open door policy for Tribal members.	Procedural	Improves beneficiary satisfaction.	High	Major
Suquamish Tribe	Role	Outreach is conducted by setting up booths at Tribal Council meetings and Tribal Fairs.	Procedural	Improves beneficiary satisfaction.	High	Minor
Suquamish Tribe	Mechanism	Postcards are mailed out to Tribal members announcing public meetings.	Procedural	Improves beneficiary communication.	High	Minor
Siletz Tribe	Mechanism	The three Tribal area offices and the Tribal Central Office, each provide a 1-800 telephone number for their beneficiaries to call for information and services.	Innovation	Enhances the delivery of beneficiary services.	High	Minor
Yakama Nation	Input	Walk-in beneficiaries to the Yakama Nation Realty Office can answer some of their own questions concerning allotments and issues related to allotments by using a Kiosk-based interactive system	Innovation	Provides beneficiaries immediate access to Trust- related information.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Northwest Region	Control	Tribes within the Region supplement federal funding with Tribal funding to improve Trust services. Tribal funding sources include Tribal Trust income, gaming and other economic enterprises.	Lack of sufficient federal funding	Ensures that Trust services are delivered.	High	Minor
Makah Field Office	Role	Makah Field Office Trust Officer has same role as Field Representative	Procedural	Minimal	Low	Minor
Northwest Region	Control Obligation	Strategic Oversight and Accountability Reporting System (SOARS)	Procedural	Used only in the Northwest Region to track congressional requests.	Low	Minor
Northwest Region	Mechanism	Federal Finance System	Procedural	Contains information on non-Trust funding and budget reference.	Low	Major
Northwest Region	Mechanism	National Indian Irrigation Management System (NIIMS)	Procedural	Contains information on irrigation billing and collection and distribution for irrigation operations and maintenance.	High	Major
Siletz	Mechanism	Laserfische	Procedural	Stores Trust documents.	Medium	Minor
Taholah Field Office	Role	Taholah Field Office Self- Governance Specialist has same role as Field Representative.	Procedural	Minimal	Low	Minor
Northwest Region	Obligation	Tribal Inheritance Probate Codes	Tribal Code	Specifies codes that allow	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
				Tribes to acquire land that would otherwise be inherited by a non-Indian and keep the land in the Trust.		
Northwest Region	Obligation	Tribal Land Use Ordinances	Tribal Ordinance	Authority of Tribes to manage agriculture, range, fishing, hunting and wildlife on the reservation.	High	Major

 Table 4.3.3- 6 Eastern Oklahoma Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Eastern Oklahoma Region	Role	BIA Regional, Agency and Field Station offices have Tribal Government Services Representatives.	Procedural	Serves as first point of contact for inquiries, which are not related to land, from individual Indians, Tribes, BIA and 3 rd party requestors.	Medium	Minor
Eastern Oklahoma Region	Role	BIA Agency Branch Chiefs provide information, assistance and services to requestors and Superintendents. In addition, they attend meetings with Tribal Councils, committees and work	Procedural	Serves as a point of contact for inquiries from individual Indians and Tribes.	High	major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		groups.				
Eastern Oklahoma Region	Mechanism	The following automated and paper based documents and logs are used by Tribal Government staff: Appeals Log Attorney Contact Log Tribal Directory Tribal Census Tribal per capita payment rolls Tribal proof of death and Heirship 	Procedural	Mechanisms help staff meet deadlines and maintain internal controls when there are limited FTE's.	High	Minor
Eastern Oklahoma Region	Role	The capacity to respond to requests depends on the size of Agency, number of allotted acres and non-land based processes.	Procedural	Affects the normal delivery of services.	Medium	Major
Five Civilized Tribes	Role	73 Act - Distribution of Judgment Funds	Obligation	Increases workload	High	Major
Eastern Oklahoma Region	Control	IAM – 101 – Procedures regarding supervised accounts.	Procedural	Minimal	Medium	Major
Five Civilized Tribes	Obligation	The following list of obligations applies. 25 CFR 115 – Trust Funds for Tribes and Individual Indians 25 CFR 116 – Creation of Trust	Federal Law	Establishes jurisdiction.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		for Restricted Program of Indians, Five Civilized Tribes Stigler Act of August 4, 1947 subjected all restricted lands of the Five Civilized Tribes to the Oil and Gas Conservation Laws of Oklahoma and allowed state district courts to approve leases.				
Osage Nation of Oklahoma	Output	The Osage Nation serves as the official record keeper for Osage allotment files, agriculture lease files, mineral lease files and family files. Osage Minerals Branch keeps a log on who is reviewing files.	Federal law	Demonstrates Tribal autonomy and establishes the ability to monitor confidential information. The Mineral Lease File keeps track of mineral lease files that have been checked out of the file room and when they are returned.	Medium	Medium
Osage Nation of Oklahoma	Obligation	The following list of obligations applies. 25 CFR 226 – Leasing of Osage Reservation Lands for Oil and Gas Mining 25 CFR 216 – Surface Exploration Mining and Reclamation of Lands 25 CFR 214 – Leasing of Osage Reservation Lands in Oklahoma	Federal Law	Establishes jurisdiction.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		for Mining Except Oil and Gas 25 CFR 154 – Osage Role Certificate of Competency 25 CFR 117 – Deposit of Individual Funds of Members of Osage without Certificate of Competency.				
Five Civilized Tribes	Organization Role Location	The Oklahoma State District Court, County Recorders Office and County Clerks Office accommodates beneficiary related questions concerning heirship (title and probate) and restricted lands, serves as the official source for checking the Trust status of restricted lands, approves oil and gas leasing and other conveyances on inherited allotments, exercises authority on all probate, guardianship and heirship matters, maintains title information and makes decisions on restricted lands and forwards probate decisions to the solicitor or heir.	Federal Law authorizing State jurisdiction	Service providers need to travel to different county court houses to perform system searches and review records.	High	Major
Osage Nation of Oklahoma	Organization Role Location	The Oklahoma State District Court accommodates beneficiary related requests concerning	Federal Law authorizing State	Service providers need to travel to different county court houses to review	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		heirship (probate), exercises jurisdiction over estates of members of the Osage Nation and forwards decisions to the solicitor or heir.	jurisdiction	records.		
Osage Nation of Oklahoma	Role	The Field Solicitor performs functions (guardianship) that were previously performed by Tribal courts, reviews decisions made by the Oklahoma State District Court, compiles recommendations and forwards them to the BIA Superintendent / Field Representative.	Procedural	Ensures compliance with federal and state laws.	High	Major
Osage Nation of Oklahoma	Mechanism	Annuity Program	Procedural	The Annuity Program is linked to TFAS.	High	Major
Osage Nation of Oklahoma	Mechanism	Mineral Records Database	Procedural	The Mineral Records Database records mineral lease ownership and interest purchase operations.	High	Medium
Osage Nation of Oklahoma	Mechanism	Lake Funds	Procedural	The Lake Funds contains 150 accounts and manages the money for the Lake Fund.	High	Medium





Table 4.3.3- 7 Southern Plains Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Concho Field Office	Organization Role	The Oklahoma State District Court serves as the official source for checking the Trust status of restricted lands (County Recorder's Office and Court Clerk's Office) and maintains title information for Trust-restricted lands.	Federal Law authorizing State jurisdiction	Service providers need to travel to different county court houses to review records.	High	Major
Southern Plains Region	Mechanism	Real Estate Service Module (REM) is used.	Procedural	The Real Estate Service Module maintains ownership records. This mechanism is being used as an interim while the Trust operational systems are down.	Medium	Minor

Table 4.3.3- 8 Rocky Mountain Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Chippewa-Cree Tribe	Input	Role of compacted Tribe in receiving requests is similar to agency role. Requests are made to Tribal Natural Resource Officer. Tribal Council makes final	Compacted Tribe	Minimal	Low	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		decisions. Field Representative handles judgment settlement funds for Tribal members.				
Crow Agency	Mechanism	National Indian Irrigation Management System (NIIMS)	Procedural	Used for the billing and collecting of irrigation operation and maintenance fees.	High	Major

Table 4.3.3-9 Navajo Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Navajo Region	Organization Role Location Output	Farmington Indian Minerals Office (FIMO) is a multi-bureau office, located in the Navajo Region, funded and staffed by BIA, BLM and MMS to serve Navajo and Indian mineral owners. FIMO provides leasing and lease administrative services, lease inspection and enforcement services, royalty compliance services and beneficiary outreach.	1992 MOU to coordinate the activities of the BIA, BLM and MMS in the Navajo Region.	Serves as a "one-stop" service office for Navajo mineral owners.	High	Major
		FIMO receives Navajo mineral owner/allottee inquiries regarding their mineral interests, account balances, and a variety of other	Joint Motion of the Parties between the Shii Shi			





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		topics. The office also conducts court-mandated outreach to provide information to allottees, answer questions and discuss issues related to mineral leases, production and other topics.	Keych Allottee Association and the Department of the Interior (April 14, 1995)			
Navajo Region	Obligation	Mescal v. United States	Court Decision	Settlement for Navajo mineral rights.	High	Major
Navajo Region	Role	Regional Director holds primary delegation of authority for the Region since there are no superintendent positions.	Delegation of Authority	Service delivery is impeded by the additional time taken to coordinate and forward documents that require	High	Minor
		Appeals only go to the Regional Director, as there aren't any Agency decisions.		approval.		
		Limited delegation of authority is with Regional Branch Chiefs.				
		Agency program managers make decisions regarding transactions that are sent to either the Branch Chief with approving authority or the Regional Director with approving authority.				
		Agency program managers deliver written responses through				





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		Regional Branch Chiefs to the Regional Director. Regional Branch Chiefs deliver written responses through Regional Director utilizing the surname process.				
Navajo Region	Obligation	Navajo Nation Leasing Act	Federal Law	Allows Navajo Nation to develop their own procedures for leasing.	High	Major
Navajo Region	Role	Office of Navajo Hopi Indian Relocation Commission (ONHIRC) assist with forced relocation of families to new lands and has authority to approve a home site on new lands. PL 93-531, Indian Family Relocation Act	Federal Law	Allows Indian beneficiaries the opportunity to gain assistance from either the Tribe or ONHIRC.	High	Major
Navajo Region	Organization	Pittsburgh Midway Coal Company issues grazing permits on reclaimed mine land.	Leasing	BIA is the intermediary between the beneficiary and the Coal Company.	Medium	Medium
Navajo Region	Role	The Eastern Navajo Allottee Association and the Shii Shi Keyah Allottee Association institute legal actions on behalf of the allottees.	Need for allottees to pursue litigation and assert rights.	Serves to protect the rights of allottees.	High	Major
Eastern Navajo Agency	Role	The Realty Clerk serves as the	Procedural	Serves as the front line	High	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		initial point of contact between beneficiaries and Branch of Realty staff. In addition to responding to requests, the clerk interviews and screens beneficiary requests and refers inquiry to appropriate staff.		interface with beneficiaries so the specialists are not interrupted.		
Fort Defiance Agency	Role	The Natural Resources Branch has a public contact person who serves as the initial point of contact between beneficiaries and branch staff.	Procedural	Serves as the front line interface with beneficiaries so the specialists are not interrupted.	High	Minor
Navajo Nation	Obligation	Tribal Resolutions	Procedural	Gives authority to the Navajo Nation Council to make grants.	High	Major
Navajo Region	Role	BIA Tribal Government Specialist and BIA Tribal Operations Specialist receives requests for information on Certificate of Indian Blood (CIB), housing and Navajo Nation. In addition to beneficiaries, inquiries come from Navajo Nation Speaker's Office, BIA Agencies and public.	Procedural	Minimal	Low	Medium
Navajo Region	Organization	Office of Surface Mining has delegated authority for the inspection of mines on Tribal and	Procedural	Minimal	Low	Medium





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		allotted lands in New Mexico.				
Navajo Region	Organization	DOI staff contact state and county government offices to formulate a response for a beneficiary.	Procedural	State and county governments are involved in the transfer of land from fee to Trust and mine inspections.	High	Major
Navajo Region	Role	On behalf of the beneficiary, there is a high level of interaction between BIA offices and other DOI offices, such as OST/OTFM and FIMO to obtain an answer for a beneficiary.	Procedural	Enhances the delivery of responses to the beneficiaries.	High	Minor
Navajo Region	Mechanism	Social Security Death Index	Procedural	Provides access to decedent information.	High	Major
Navajo Region	Mechanism	Probate Databases	Procedural	These are internal	Medium	Medium
Eastern Navajo Agency				databases.		
Navajo Nation	Obligation	Treaty of 1850 and Treaty of 1868	Treaty	Legal instrument providing Tribe with land and recognition as a nation.	High	Major
Navajo Nation	Obligation	The Navajo Nation Code	Tribal Code	Contains the general and permanent provisions of the resolutions of the Navajo Nation Council.	High	Major





Table 4.3.3- 10 Southwest Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Southwest Region	Organization	OST/OTFM does not have any Agency Offices. However, on behalf of the beneficiary, there is a high level of interaction between OST/OTFM and other DOI offices.	Organization	The Regional Office OST/OTFM staff manages all transactions.	Medium	Major
Southwest Region	Organization	The Regional Office provides services mostly to Agency Superintendents. Only one Agency has a Tribal Government Representative.	Procedural	Minimal	Low	Minor

Table 4.3.3- 11 Western Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Hopi Tribe	Mechanism	Hopi Tribe does not use the DOI systems.	Compacted Tribe	Minimal	Low	Major
Hopi Tribe	Mechanism	Hopi Tribe Realty does not utilize logs to record written requests for information.	Procedural	Prohibits follow-up with beneficiary	High	Minor
Hopi Tribe	Input	Hopi Tribe conducts outreach regarding probate and allotment issues.	Procedural	Improves beneficiary satisfaction.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Colorado River Indian Tribes	Role	Department of Justice responds to inquiries related to litigation concerning Trust lands i.e., western reservation boundary	Litigation	Represents legal interests of Tribes regarding trust lands.	High	Major
Chemehuevi Indian Tribe	Role	Department of Justice responds to inquiries related to litigation	Litigation	Represents legal interests of Tribe regarding trust lands.	High	Major
		concerning Trust lands i.e., Shoreline leases.	United States vs. Aria et al, Section 4	The regarding trust lands.		
Salt River Agency	Mechanism	Salt River does not use any of the DOI computer systems.	Compacted Tribe	Minimal	Low	Major
Salt River Pima-Maricopa Indian Community	Organization	The Salt River Pima-Maricopa Indian Community has compacted all federal Trust functions and therefore, serves as the official record repository and service provider.	Compacted Tribe Title 25 CFR E.O. 13175 BIA Government – to- Government Policy	Fulfils DOI's Self- Governance Objective.	High	Major
Salt River Pima-Maricopa Indian Community (SRPMIC)	Mechanism	SRPMIC System is a network of systems and applications including: Allotment Management System Lease Management System Financial Payment System Geographic Information System	Compacted Tribe	This network of systems stores and retrieves information concerning Trust land and accounts.	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Salt River Pima-Maricopa Indian Community (SRPMIC)	Mechanism	SRPMIC System includes a TEAMS component. CRIT uses TEAMS	Innovation	Stores and retrieves information concerning Tribal elections and enrollments.	High	Minor
Colorado River Indian Tribes (CRIT)						
Pima Agency	Mechanism	ANADARKO	Procedural	Stores information on land ownership.	Low	Major
Pima Agency	Mechanism	National Indian Irrigation	Procedural	Used for the billing and	High	Major
Uintah and Ouray Agency		Aanagement System (NIIMS)		collecting of irrigation operation and maintenance fees.		
Fort Yuma Agency						
San Carlos Agency						
Uintah and Ouray Agency	Organization	The Utah Division of Gas, Oil and Mines addresses requests from the BIA Agency regarding oil and gas matters on the Uintah and Ouray Ute Indian Reservation.	Procedural	Minimal	Low	Minor
Uintah and Ouray Agency	Mechanism	MMS has an Indian Mineral Owners Database that is used for research and interface with the RDRS.	Procedural	Minimal	Low	Major
Uintah and Ouray Agency	Mechanism	BLM - AFMSS	Procedural	Used by BLM to conduct production audits for oil	Medium	Medium





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
				and gas wells.		
Uintah and Ouray Agency	Mechanism	BIA - NIOGEMS	Procedural	Oil and gas production application.	Medium	Major

Table 4.3.3- 12 Pacific Region Beneficiary Services Variance Table

Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Central California Agency Southern California Agency	Input	The workload for these Agencies includes a high volume of beneficiary contact form non- enrolled California Indians. In most cases, they are members of non-recognized Tribes who have a fee interest in public domain tracts of land. These Agencies also serve Tribal members from recognized Tribes from other states.	Demographics	Increases the Agency workload.	High	Major
Pacific Region	Organization Role Location	BIA Agency Advisory/Policy Boards Each of the three BIA Agencies have an advisory board composed of elected Tribal leaders who represent the interest of the Tribes in the respective Agency service	Established by the Regional Director	Ensures that the Superintendent considers the interests and concerns of the large number of Tribes being serviced by the Agencies.	High	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
		areas. Beneficiaries contact the board's representatives on Trust- related issues.				
Pacific Region	Organization Role Location	 BIA Regional Advisory/Policy Board Advises the Regional Director on Tribal interests. The board is composed of members of the 3 Agency Advisory/Policy Boards. 	Established by the Regional Director	Advises the Regional Director on Tribal interests and concerns.	High	Minor
Pacific Region	Organization Role Location	State, County and Local Governments. PL-280 - Enables states to assume criminal and civil jurisdiction over Indians and their lands.	Federal Law	State, County and Local law enforcement agencies exercise civil and criminal jurisdiction over activities on Indian Reservations. Usually, BIA contacts these agencies on behalf of the beneficiary. However, in trespass cases, the beneficiary may go directly to the county sheriff.	High	Major
Palm Springs Field Office	Obligation	25 CFR, Section 1.4(b) and the 81 USC. Instrument to reduce litigation.	Federal Law	Fulfills Trust obligations by authorizing Land Use Agreements between the Agua Caliente Band of Cahuilla Indians and City of Palm Springs.	High	Major
Pacific Region	Organization Role	California Indian Legal Services	Need for California	Point of contact for beneficiaries regarding	High	Major





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
	Location		Indians to pursue litigation and assert rights.	Trust-related legal issues and serves as intermediary between the beneficiaries and the BIA.		
Pacific Region	Organization Role Location	Native American Rights Fund (NARF)	Need for California Indians to pursue litigation and assert rights.	Represents the legal interest of Tribes and individual Indians.	High	Minor
Pacific Region	Control	Regional Office Addendums to BIA Manuals and Handbooks	Procedural	Minimal	Low	Minor
Pacific Region	Mechanism	Only OST/OTFM uses LRIS.	Procedural	Minimal	Low	Major
Palm Springs Field Office	Obligation	Memorandum of Understanding between BIA and Agua Caliente Band of Cahuilla Indians	Procedural	Provides policy dealing with leasing.	High	Minor
Palm Springs Field Office	Mechanism	PC Lease	Procedural	Supports the posting of accounts receivable for leases.	Medium	Minor
Palm Springs Field Office	Mechanism	KEYFILE	Procedural	Document imaging and scanning system.	Medium	Minor
Southern California Agency	Control	Branch of Realty's Policy Handbook The operating procedures cover the handling of files, due dates and task assignments.	Procedural	Minimal	Medium	Minor





Areas Affected by the Variance	Category	Variance Description	Reason for Variance	Business Impact	Degree of Business Impact	Difficulty of Change
Southern California Agency	Organization Role Location	Southern California Tribal Chairmen's Association	Tribal representation through the association.	Represents the interest of the Tribes to the BIA.	High	Minor
Pacific Region	Organization Role Location	California Indian Forest and Fire Management Council (CIFFMC)	Tribal representation through the consortium.	Acts on behalf of the California Tribes who have timber interest.	High	Minor
Southern California Agency	Organization Role Location	Southern California Indian Natural Resources Consortium (SCINRC)	Tribal representation through the consortium.	Consortium that consists of 16 self-governance Tribes and operates as a service provider to the members. The consortium contacts BIA on behalf of the member Tribes.	High	Minor
Southern California Agency	Organization Role Location	San Luis Rey Indian Water Authority	Tribal representation through the consortium.	Consortium that makes decisions on behalf of 5 Southern California Tribes.	High	Minor