

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE PEPION COBELL, et al.,)
)
Plaintiffs,)
)
v.)
)
DIRK KEMPTHORNE, Secretary of the)
Interior, et al.,)
)
Defendants.)
_____)

Case No. 1:96cv01285-JR

**NOTICE OF FILING OF INTERIOR DEFENDANTS'
THIRTY-FIFTH STATUS REPORT**

Interior Defendants hereby give notice of the filing of their thirty-fifth report due in accordance with the Order of December 21, 1999.

A copy of the report is attached hereto.

Dated: January 16, 2009

Respectfully submitted,

GREGORY G. KATSAS
Assistant Attorney General
MICHAEL F. HERTZ
Deputy Assistant Attorney General
J. CHRISTOPHER KOHN
Director

/s/ John R. Kresse
ROBERT E. KIRSCHMAN, Jr.
Deputy Director
(D.C. Bar No. 406635)
JOHN R. KRESSE
Trial Attorney
Commercial Litigation Branch
Civil Division
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044-0875
Phone (202) 616-2238
Fax (202) 307-0494

CERTIFICATE OF SERVICE

I hereby certify that, on January 16, 2009 the foregoing *Notice of Filing of Interior Defendants' Thirty-Fifth Status Report* was served by Electronic Case Filing, and on the following who is not registered for Electronic Case Filing, by facsimile:

Earl Old Person (*Pro se*)
Blackfeet Tribe
P.O. Box 850
Browning, MT 59417
Fax (406) 338-7530

/s/ Kevin P. Kingston
Kevin P. Kingston



THE SECRETARY OF THE INTERIOR
WASHINGTON

JAN 15 2009

J. Christopher Kohn
U.S. Department of Justice
Civil Division
Commercial Litigation Branch
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044-0875

Re: Cobell v. Kempthorne – Status Report to the Court Number Thirty-Five

Dear Mr. Kohn:

Enclosed is the Department of the Interior's *Status Report to the Court Number Thirty-Five (for the Period October 1, 2008 through December 31, 2008)*. Please forward a copy to the Court.

My signature on this report reflects my reliance on the assurances of those who have compiled the report that the information contained herein is accurate.

Thank you for your assistance.

Sincerely,



DIRK KEMPTHORNE

Enclosure

Status Report to the Court Number Thirty-Five

**For the Period
October 1, 2008 through December 31, 2008**



January 16, 2009

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INTRODUCTION

This *Status Report to the Court Number Thirty-Five* (Report) represents the period from October 1, 2008, through December 31, 2008. The Report is presented for the purpose of informing the Court of actions taken since the issuance of the preceding quarterly report. The Report includes delays in and obstacles to trust reform activities. A report on the progress of the historical accounting of individual Indian beneficiary funds managed by Interior is a primary part of the Report.¹

This Report is prepared in a manner consistent with previous reports to the Court. Managers from the Office of Historical Trust Accounting, Office of the Special Trustee for American Indians, Office of the Chief Information Officer, Bureau of Indian Affairs, Bureau of Land Management, and Minerals Management Service submit reports on the status of their respective Indian trust activities.

A glossary of acronyms and abbreviations is included in this Report. The glossary is located at the end of the Report.

¹ This Report contains information on the broad trust reform efforts underway at Interior. Accordingly, it may include information on reform efforts that are not within the scope of the *Cobell* litigation.

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January 16, 2009

Office of the Special Trustee for American Indians

I. OFFICE OF THE SPECIAL TRUSTEE FOR AMERICAN INDIANS

This Report contains general information on the implementation of the many trust reform projects discussed in my previous "Observations." Of particular interest to the Court may be the report from OHTA. In this report, the Court will find the work being done to resolve many special deposit accounts, the continued research into past paper records to support the ongoing accounting and the testing of systems to determine their accuracy.

Assurance Statement

The comments and observations are provided by the Special Trustee for American Indians and reflect the opinion of the Special Trustee only.

Date: January 13, 2009

Name: *Signature on File*
Ross O. Swimmer
Special Trustee for American Indians

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A. OFFICE OF HISTORICAL TRUST ACCOUNTING

Introduction

OHTA's historical accounting includes all transactions in IIM accounts open on or after October 25, 1994 (the enactment date of the American Indian Trust Fund Management Reform Act), through the earlier of the date of account closure or December 31, 2000. OST has regularly issued account statements to IIM account holders since the end of 2000.

Accomplishments

AIRR

OHTA moved into its new facility in Lenexa, Kansas adjacent to the AIRR. OHTA's new work space accommodates document searching, imaging, coding and digitizing, and meetings. This work space replaces OHTA's initial space at the AIRR, which was leased from NARA. The original OHTA archival space expands NARA's record storage space.

Electronic Ledger Era

Data completeness validation tests and interest recalculation work, as described below, were completed for over 13,907 Land-Based IIM accounts, for a cumulative total of 163,795 Land-Based accounts. Thus, OHTA has completed work on Electronic Ledger Era transactional data necessary to create 163,795 HSAs in accordance with the time frame specified in the May 31, 2007, Historical Accounting Plan for Individual Indian Money Accounts.

Current Status

Electronic Ledger Era

Data Completeness Validation: Confirming Completeness of Land-Based IIM Accounts through System Tests

Data completeness validation is a process consisting of multiple tests (Transaction and Disbursement Mapping, Balance Comparison, Account Number Review, and System Conversion Tests).

Transaction Mapping: Confirms whether transfer and reversal transactions are correctly posted within the IIM accounting systems (*i.e.*, that no transactions are missing from the electronic record). This test is 98.8% complete. During this reporting period, transaction mapping for approximately 1,343,000 transactions was completed. Of these, 4,900 were pre-December 31, 2000, transactions. The number of transactions that require mapping increases as IRMS transactions are restored to the dataset and current period TFAS transactions are added to the dataset.

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Office of Historical Trust Accounting

Disbursement Mapping: Confirms the status of disbursements issued during the timeframes of the Treasury CP&R System for check payments and the Treasury PACER System for electronic payments. Additionally, this test is used to identify cancelled disbursements which should be re-credited to an IIM account. The mapping of the CP&R data through April 30, 2006, is 99.4% complete. The mapping of the PACER data through March 31, 2008, is 100% complete. Disbursement Mapping is updated as data are received from Treasury on current check and electronic disbursements. No new activity occurred during this reporting period.

Balance Comparison: Confirms whether transactions that would be included in an HSA correspond to the December 31, 2000, TFAS balance. This test is 100% complete for TFAS data and 93.8% complete for the IRMS data. During this reporting period, 30,648 out-of-balance accounts were resolved so that the December 31, 2000, balance and the transactional data now agree.

Account Number Review: Ensures that OHTA provides the appropriate transactions to each IIM account holder who would receive an HSA regardless of whether the account number was reused or changed historically. This test is 99.9% complete. During this reporting period, work continued on identifying new accounts and identifying when an account number has been reused historically and/or an account has multiple names but was owned by a single individual. The number of transactions reviewed increases as IRMS transactions are restored to the dataset and current period TFAS transactions are added to the dataset.

System Conversion Test: During this reporting period, the preliminary listing of IIM accounts open during the pre-1985 Paper Ledger Era continued to be updated for testing the conversion from paper ledgers to IRMS. The OHTA copy of the Electronic Ledger Era IRMS database contains 56,754,678 transactions to date, including 325,328 restored transactions, of which 130 were restored during this reporting period. OHTA also has identified 3,421,137 IRMS account balance records, including 332,237 restored balances, of which approximately 53,700 IRMS balances were restored during this reporting period. These restored transactions and balance records rarely impact the current account balances.

The foregoing tests were designed to and have identified transactions and balances which were in the original IRMS electronic dataset but were not available in the electronic database provided by OST to OHTA.

Land-to-Dollars Test

The Land-to-Dollars test determines whether expected revenues documented by surface or subsurface leases are recorded as revenue credits in the IIM accounting systems for the Electronic Ledger Era. There was no activity on this test during this reporting period. The priority for working on Land-to-Dollars testing has been lowered, in part, to give higher priority to Paper Ledger Era historical accounting activities.

Interest Recalculation for Land-Based IIM Accounts

The objective of interest recalculation is to provide a detailed estimate of the interest that should have been posted to an account, applying the same interest distribution policies that BIA and OST used historically. The interest recalculation also serves as an additional data completeness test since missing transactions in the dataset would cause an exception in the interest recalculation. The recalculated interest is then compared to the actual posted interest to identify variances.

OHTA continued interest recalculation work for IIM accounts in all BIA regions. Interest recalculation was completed during this reporting period for 17,931 IIM accounts, increasing the total of such tested Land-Based IIM accounts to 167,821 within all 12 BIA regions. The accuracy of interest postings is quality-control checked by a professional accounting firm contractor not involved in the interest recalculation effort.

Judgment and Per Capita IIM Accounts

Results to date are summarized in *Status Report to the Court Number Twenty-Nine*. No further work was conducted on these accounts during this reporting period. OHTA still awaits approval from the Court to mail 66,130 HSAs to Judgment and Per Capita IIM account holders.

Paper Ledger Era

Reconstruction of Paper Ledger Era IIM Accounts

OHTA continues to research and examine IIM records from the Paper Ledger Era to determine the accuracy and reliability of transactions that should be included in HSAs for Cobell class members.

During a previous reporting period, a sample was drawn from the subpopulation of accounts either known or believed likely to have transactions beginning in the Paper Ledger Era and continuing into the Electronic Ledger Era. The search to locate the paper ledgers for these accounts was continued during the current reporting period. Additionally, OHTA's accounting firm contractors have continued to review account jacket files and paper ledgers to assess when each sampled IIM account opened and when the reconstruction of the Paper Ledger Era account activity has been completed.

Reconciliation of Paper Ledger Era Accounts

As previously reported, to conduct a "Proof-of-Concept," a pilot sample of non-interest transactions was drawn from reconstructed Land-Based IIM accounts in the Southern Plains Region. OHTA's contractors continued to reconcile these sampled transactions in accordance with the ASM throughout this reporting period.

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Office of Historical Trust Accounting

During this reporting period, the Alaska Region’s sampled non-interest transactions have been completely reconciled and are now undergoing quality assurance procedures.

OHTA SDA Distribution Project – Undistributed SDA Balances

During this reporting period, work by OHTA and its contractors resulted in the distribution of \$305,774 of undistributed SDA balances, raising the total dollars resolved and funds distributed as of December 31, 2008, to \$51.8 million of SDA balances. As of December 31, 2008, a total of 10,680 SDA, involving \$15,033,822, remain to be resolved and distributed. Of those SDA, 7,633 (71.5% of the remaining SDA) have balances of less than \$500 each, involving \$631,533 (4.2% of the remaining dollars).

As reflected in the table below, OHTA’s distribution of residual SDA balances continues to show that only about one-third of undistributed SDA funds belonged to IIM account holders. OHTA’s work has also confirmed that, historically, Interior credited monies into the IIM accounting systems that were never intended for individual Indians.

OHTA SDA DISTRIBUTION PROJECT (1)

SDA Resolved Dollars	Transfer to Tribal Accounts	Transfer to IIM Accounts	Paid to Non-Indian, Third Party and Other (2)	Total
Dollars resolved as of September 30, 2008	\$16,709,892	\$17,092,226	\$17,685,224	\$51,487,342
Dollars resolved from September 30, 2008, through December 31, 2008	\$63,691	\$222,042	\$ 20,041	\$305,774
Total Dollars Distributed as of December 31, 2008	\$16,773,583	\$17,314,268	\$17,705,265	\$51,793,116
Percent of Dollars Distributed	32.4%	33.4%	34.2%	100%

Note (1) Includes historic SDA principal and interest postings through the date of distribution (*i.e.*, total distribution amounts).

Note (2) Includes transfers to Treasury, account reclassifications, transfers to non-Indian parties and transfers to Interior’s Federal Finance System.

Imaging/Coding - Individual Indian Trust Documents

During this reporting period, OHTA completed imaging 760,752 IIM pages, coding 387,489 IIM documents and loading 319,157 IIM documents into ART. As of January 1, 2009, ART contained 12.5 million coded IIM images and 10.4 million coded tribal images. The coded images to date total approximately 22.9 million, constituting 4.6 million IIM and tribal documents.

Of these coded and imaged documents, 5,674 images include 95,673 IIM transactions that have been added to the Paper Ledger Era database, of which 3,798 transactions were added during this reporting period. These Paper Ledger Era transactions are being sampled for reconciliation.

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Office of Historical Trust Accounting

OHTA's Federal Records Management

OHTA delivered an electronic copy of the ART to NARA for pre-accessioning on March 7, 2008. If accepted by NARA and if OHTA can resolve technical issues, the ART data will be maintained by NARA, with formal accessioning (i.e., legal transfer to NARA) to occur at a future date as jointly agreed to by NARA and Interior. As new records are added to ART, OHTA expects to submit ART updates periodically to NARA.

Delays and Obstacles

OHTA responds to information needs of SOL and the Department of Justice in the *Cobell v. Kempthorne* litigation and 96 tribal trust cases pending in multiple federal courts. As a result, other OHTA work has received lower priority and fewer resources.

Assurance Statement

I concur with the contents of the information contained in the Office of Historical Trust Accounting section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 12, 2009

Name: *Signature on File*
Bert T. Edwards, Executive Director
Office of Historical Trust Accounting

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B. TRUST SERVICES – CURRENT ACCOUNTING

Introduction

Current accounting activities focus on: (a) special deposit accounts; (b) whereabouts unknown accounts; and (c) small balance accounts.

a. Special Deposit Account Activity

Current Status

BIA has the responsibility for distribution of SDA funds received since January 1, 2003 (prospective receipts). During this reporting period, there were 17 receipt transactions posted to SDA.

Current SDA are those which cannot be distributed due to pending appeals of range rates and mineral leases (\$234,179.94), SOL opinions (\$79,834.63) and cadastral surveys (\$7,333.09). In addition, current SDA contain one non-trust receipt (\$176.00) that was erroneously deposited to trust, which is expected to be resolved during the next reporting period.

b. Whereabouts Unknown Accounts

Current Status

Priority continues to be placed on securing current addresses for account holders of the rolling top 100 highest dollar balance WAU accounts. During this reporting period, nine of the top 100 WAU accounts, with combined account balances of approximately \$1.1 million, were updated with current addresses.

During this reporting period, 6,180 accounts with a combined balance of \$1.8 million were added to the WAU list, while 4,312 accounts with a combined balance of \$5.5 million were updated with current addresses.

As of December 31, 2008, there were 85,541 WAU accounts with a combined balance of \$73.7 million. IIM accounts coded as WAU earn interest in the same manner as all other IIM accounts. The following table illustrates the number of accounts stratified by account balance and WAU category.

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Trust Services – Current Accounting

Account Balance	Correspondence/ Check Returned	Account Setup/No Address	Awaiting Address Confirmation	Refused/ Unclaimed Mail	Total
Equal to or over \$100,000	18	13	0	0	31
Under \$100,000 and equal to or over \$50,000	40	22	0	1	63
Under \$50,000 and equal to or over \$5,000	2,269	795	4	3	3,071
Under \$5,000 and equal to or over \$1,000	5,888	1,583	0	7	7,478
Under \$1,000 and equal to or over \$100	9,443	3,835	9	9	13,296
Under \$100 and equal to or over \$1	16,898	7,091	19	29	24,037
Under \$1	13,020	24,486	43	16	37,565
Total	47,576	37,825	75	65	85,541

c. Small Balance Accounts

Current Status

As of December 31, 2008, there were 19,501 accounts with a \$.01 - \$1.00 balance and no activity for the previous 18 months. The total in those accounts was \$5,521.46. Statements are sent to account holders for these accounts on an annual basis pursuant to direction from Congress.

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Trust Services – Current Accounting

Assurance Statements

I concur with the content of the information contained in the Whereabouts Unknown Accounts subsection of the Current Accounting Activities section of the *Status Report to the Court Number Thirty-Five*. The information provided in this subsection is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
Bryan Marozas
Program Manager, Trust Beneficiary Call Center
Office of the Special Trustee for American Indians

I express no opinion on the content of the Whereabouts Unknown Accounts subsection, above. I concur with the content of the information contained in the balance of the Current Accounting Activities section of the *Status Report to the Court Number Thirty-Five*, and this information is accurate to the best of my knowledge.

Date: January 13, 2009

Name: *Signature on File*
Margaret Williams
Deputy Special Trustee, Trust Accountability
Office of the Special Trustee for American Indians

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C. OFFICE OF TRUST RECORDS

Introduction

The Office of Trust Records was established in 1999 to develop and implement a program for the economical and efficient management of trust records, consistent with the 1994 Act, the Federal Records Act and other statutes and implementing regulations. The OTR records management program has been developed and implemented, and continues to evolve, to ensure that necessary Indian records are maintained, records retention schedules are consistent with retention needs, and records are safeguarded throughout their life-cycles.

The American Indian Records Repository, located in Lenexa, Kansas, was built by Interior in collaboration with NARA for the purpose of consolidating and preserving Indian records at one NARA regional records center.

Accomplishments

American Indian Records Repository

Approximately 3,440 boxes of inactive records were moved from BIA and OST field locations to the Lenexa Annex for indexing during this reporting period. Indexing of approximately 185,725 boxes has been completed as of the end of this reporting period. 176,100 indexed boxes have been sent to AIRR for permanent storage.

Training

OTR provided records management training for 151 BIA and OST records contacts and 59 tribal employees during this reporting period. OTR provides records management training to Tribes as they request training.

Current Status

Records Retention Schedules

Records retention schedules for the following BIA electronic records systems were forwarded to NARA in October 2008: the Loan Management and Accounting System, the Maximo System (for facility management) and the Land Consolidation Tracking System.

Several BIA electronic system records schedules, previously submitted to NARA, remain pending for approval.

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Office of Trust Records

Delays and Obstacles

Court orders in tribal litigation cases continue to restrict movement of records to AIRR, which limits Interior's ability to consolidate Indian records in a central location, thus hindering its ability to provide records to parties in litigation.

Assurance Statement

I concur with the content of the information contained in the Office of Trust Records section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 9, 2009

Name: *Signature on File*

Ethel J. Abeita

Director, Office of Trust Records

Office of the Special Trustee for American Indians

D. TRUST ACCOUNTABILITY

1. TRUST BUSINESS PROCESS MODELING

Introduction

Interior is working to build a highly effective fiduciary trust services organization by implementing the business objectives contained in the Comprehensive Trust Management Plan. The CTM laid the groundwork for the development of the Fiduciary Trust Model. The FTM is being implemented to transform the current trust business processes into more efficient, consistent, integrated and fiscally responsible business processes that meet the needs and priorities of the beneficiaries. Implementation of the FTM is a collaborative effort of BIA, OST, BLM, MMS and OHA, and is integrated with Interior's other trust reform initiatives.

Current Status

Reengineering staff continued to provide technical support for identifying system requirements for various modules within TAAMS. Staff continued to test a beta version of the trust portal that contains TAAMS and TFAS data and associated reports and began researching and planning for the development of standard Indian trust acreage reporting currently not available as a standardized report in TAAMS.

Reengineering staff continued to provide technical support for conversion of RDRS to an oil and gas royalty management module within TAAMS.

Reengineering staff continued to provide support to the BIA Ft. Berthold Agency, gathering documentation to support transmission systems for natural gas, developing common access corridors, and meeting with other Interior agencies involved in the oil and gas process. Staff also provided maps identifying proposed well site locations and continued to provide other mapping support through NIOGEMS.

Reengineering staff delivered the draft BIA LTRO handbook to BIA for review and comment.

Assurance Statement

I concur with the content of the information contained in the Trust Business Process Modeling section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 13, 2009

Name: *Signature on File*

Margaret Williams

Deputy Special Trustee, Trust Accountability

Office of the Special Trustee for American Indians

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2. TRUST DATA QUALITY AND INTEGRITY

Introduction

The success of trust reform depends, in part, on the accuracy of data generated from the maintenance of trust assets, ownership of trust assets, distribution of trust income, and management of trust accounts. The DQ&I project focuses on three primary initiatives.

The first initiative is assisting BIA with document encoding into TAAMS. On September 30, 2007, BIA completed conversion to TAAMS Leasing, which is used to manage trust land activity. BIA previously completed its conversion to TAAMS Title, which is used to record Indian title activity.

The second initiative involves the validation and correction of CDE to their respective source documents. CDE are defined as those trust data elements that are needed to provide: (1) timely and accurate payments to beneficiaries; (2) timely and accurate transaction listings and asset inventories to beneficiaries; and (3) effective management of the assets. Examples of CDE are beneficiary name, account number, tract identification number, and land ownership interests.

The third initiative is implementation of a Post-QA review process. The Post-QA review process helps to ensure the ongoing accuracy of CDE by comparing TAAMS document encoding to the respective source input document.

Accomplishments

During this reporting period, TPMC's contractors completed:

Encoding

- Encoding ROW (1,465) and range permits (34) for the Confederated Salish and Kootenai Tribes (Flathead Agency).
- Encoding expiration dates and changing document status from approved to expired (2,660) for the Confederated Salish and Kootenai Tribes (Flathead Agency).
- Encoding trust deeds (1,180) and legal land descriptions (80) for the NWRO LTRO.
- Encoding Nana Regional Corporation land tracts (1,603) for ARO LTRO.
- Encoding business leases (7), homesite leases (18), and ROW (32) for the Northern Pueblos Agency.
- Encoding surface leases for the SWRO LTRO during the previous reporting period.

Research

- Researching tract ownership (120) for Uintah and Ouray Agency.
- Researching and preparing probate modifications (1,145) for the Western Nevada Agency.

Current Status

TPMC's contractors continued to assist BIA and Tribes with TAAMS Leasing post-conversion and TAAMS Title cleanup efforts by:

- Conducting Post-QA review of 15,841 (cumulative total 255,143) transactions encoded into TAAMS at the BIA LTROs and the contractor's Albuquerque office.
- Encoding 72 (cumulative total 614) ID numbers and 86 (cumulative total 396) probate orders for PRO LTRO.
- Encoding one (cumulative total 286) Global ID number update for SPRO LTRO.
- Encoding 438 (cumulative total 832) variance sheets and 9,199 (cumulative total 11,042) landowner ID numbers for SWRO LTRO.
- Encoding 110 (cumulative total 129) surface leases for Colorado River Agency.
- Researching 593 (cumulative total 3,773) landowner ID numbers for PRO LTRO and 465 (cumulative total 4,733) for SWRO LTRO.

TPMC's contractor also assisted FIMO with distributing \$56,278.72 to IIM account holders affected by FIMO's oil and gas lease re-numbering issue as previously reported.

Assurance Statement

I concur with the content of the information contained in the Trust Data Quality and Integrity section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 9, 2009

Name: *Signature on File*

John E. White

Trust Reform Officer, Trust Accountability

Office of the Special Trustee for American Indians

3. INDIAN FIDUCIARY TRUST TRAINING PROGRAM

Introduction

Interior has a continuing responsibility to provide adequate staffing, supervision and training for trust fund management and accounting activities. Fiduciary trust training is essential to the success of Interior's trust reform efforts and forms an integral part of all training for Interior employees who are involved in the management of Indian trust assets.

Current Status

During this reporting period, Cannon Financial Institute presented seven specialty courses to 136 employees of OST, BIA and Tribes. The specialty courses, Fiduciary Behaviors, Guardianship, Trust Principles, Probate, Risk Management, Trust Accounting, and Review and Exam are part of the *Certified Indian Fiduciary Trust Specialist* certification program.

During this reporting period, OST training staff conducted two training sessions for 40 employees and contractors from OST and BIA on the use of TFAS and related systems and reporting programs that include:

- CSS – used to enter, approve and post cash transactions;
- Stratavision – contains daily, weekly and monthly reports from OST systems for viewing by OST and BIA staff;
- Historical Query Database – contains account transaction history going back to 1985; and
- TAAMS invoicing and distribution module – used for tracking lockbox receipts.

OST and BIA staff presented one *Trust Fundamentals* course to ten employees and contractors of OST, BIA, BLM, MMS, and Tribes. This course includes such topics as the history and policy of Indian trust, current trust reform activities, job roles and responsibilities, and organization and working relationships.

Assurance Statement

I concur with the content of the information contained in the Indian Fiduciary Trust Training Program section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
Jacqueline Arviso
Acting Director, Office of Trust Training
Office of the Special Trustee for American Indians

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4. RISK MANAGEMENT

Introduction

The Deputy Special Trustee, Trust Accountability is responsible for overseeing OST's risk management program, which is implemented by the Trust Program Management Center. TPMC risk management staff identify and document OST programs, policies, procedures and processes, both trust and administrative activities. TPMC staff also develop, operate and maintain risk-based management tools to support and monitor the risk levels and implementation of corrective actions. In addition, TPMC staff facilitate program reviews, which include testing of program operations, financial reports, and compliance with the law. These tests and reviews provide the basis for OST's interim and annual statements of assurance.

Accomplishments

OST developed and added several analytical and summary reports to RM-PLUS that provide management with additional support for their interim and annual statements of assurance.

Current Status

Risk management staff continued to evaluate changes to risk management content for various programs, as well as further development of the collaborative testing plan of key controls for OST, BIA, MMS and BLM for FY2009.

As a result of the FY2008 self-assessments, 38 RM-PLUS corrective action plans remain open.

Assurance Statement

I concur with the content of the information contained in the Risk Management section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
John Constable
Program Analyst
Office of the Special Trustee for American Indians

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5. TRUST REGULATIONS, POLICIES AND PROCEDURES

Introduction

The Office of Trust Regulations, Policies and Procedures was established on April 21, 2003, to assist Interior in establishing “consistent, written policies and procedures for trust fund management and accounting,” as stated in the 1994 Act. OTP oversees and facilitates the development, promulgation and coordination of trust-related regulations, policies, procedures and other materials to guide the proper discharge of Interior’s fiduciary responsibilities. OTP is separate from the Office of Regulatory Management, AS-IA. ORM activities are reported in the Indian Affairs section of the report to the Court.

Accomplishments

- The revised OST Privacy Act disclosure statement was published in the Federal Register.
- Thirteen new or revised policies, procedures, and handbooks were completed and published during the reporting period.
- Twenty-one programmatic and administrative delegations of authority affecting Trust Services were issued during the reporting period.

Current Status

Final drafts of the Trust Beneficiary Call Center policy and handbook were completed and are expected to be surnamed and published during the next reporting period.

Assurance Statement

I concur with the information contained in the Office of Trust Regulations, Policies and Procedures section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 13, 2009

Name: *Signature on File*
John Marshall, Director
Office of Trust Regulations, Policies and Procedures
Office of the Special Trustee for American Indians

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E. TRUST REVIEW AND AUDIT

Introduction

OTRA reports directly to the Special Trustee for American Indians. OTRA was created by OST as a response to trust initiatives developed during the tribal consultation process of 2002. OTRA conducts performance audits, examinations and reviews of Interior entities as well as Tribes that perform fiduciary trust activities. Examinations are routinely conducted at locations that perform trust operations, resulting in a performance rating. Also, compliance reviews are undertaken in response to information and complaints received from beneficiaries, employees and the public.

Current Status

Indian Trust Examinations

OTRA conducted seven Indian trust examinations and three follow-up reviews on the status of corrective action implementation. OTRA issued two draft reports, 10 final Indian trust examination reports, and five final follow-up corrective action reports. Of the 12 Indian trust examination reports issued, ten offices were rated “satisfactory,” one office was rated “in need of improvement,” and one tribal program was rated as “non-compliant or imminent jeopardy.”

For those offices “in need of improvement” or “non-compliant or imminent jeopardy,” OTRA reported 10 findings in three component areas:

- Asset management – three findings involving land conveyance transactions, lease administration and rights-of-way.
- Compliance – three findings involving forestry, grazing and lease administration.
- Operations – four findings involving cash management and probate.

Records Assessments

The records assessment is a focused evaluation of records maintenance and security. OTRA completed five trust records assessments and five follow-up reviews on the status of corrective action implementation. OTRA issued five final records management assessment reports and nine records management follow-up reports.

Compliance/Investigative Reviews

OTRA received one request for a special review relating to trust operations. OTRA issued one final special review report.

OTRA issued five inquiries seeking the status of corrective actions recommended in previous reporting periods.²

² For the fourth quarter of FY2008, the correct number of inquiries issued was 13 rather than the 18 reported.

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Trust Review and Audit

Assurance Statement

I concur with the content of the information contained in the Trust Review and Audit section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 9, 2008

Name: *Signature on File*

Larry Morrin

Director, Office of Trust Review and Audit

Office of the Special Trustee for American Indians

F. OFFICE OF APPRAISAL SERVICES

Introduction

The Office of Appraisal Services is responsible for Indian land valuations required by various regulations governing Indian trust lands. To meet these requirements, an appraisal or other valuation method is used to determine fair market value of Indian lands.

Accomplishments

OAS transmitted 1,182 real estate appraisals to clients. In support of ILCP, OME evaluated 14 parcels.

Current Status

OAS is working with NBC to establish training and implementation schedules for OAS use of the ARRTS program.

As in previous reporting periods, the “appraisal backlog” includes appraisal requests that contain all required supporting documentation and are more than 90 days old. The backlog also includes requests for review of appraisals performed by compacted and contracted Tribes that are more than 30 days old. Counting methodologies vary from region to region. The appraisal backlogs as reported by the regions are as follows:

This section continues on the next page.

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January 16, 2009

Office of Appraisal Services

Region	Appraisal Backlog As of 09/30/08	Appraisal Backlog As of 12/31/08
Northwest	471	434
Rocky Mountain	378	278
Midwest	39	39
Western	0	17
Southwest	28	31
Eastern Oklahoma	75	58
Navajo	0	1
Pacific	12	1
Alaska	125	186
Eastern	0	0
Southern Plains	17	3
Great Plains	2,224*	58**
TOTAL	3,369	1,106

* This number includes requests (majority are ILCP related) that have been initiated, approved, accepted, and submitted for completion using ATLAS.

** The reduction in backlog is due to the implementation of Undivided/Fractionated Appraisal System (U/FAS) distributed to the Cheyenne River, Pine Ridge, Rosebud, Standing Rock, Yankton, Winnebago, Fort Berthold, Fort Totten, and Sisseton Agencies and ILCO for use to estimate values for fractionated interests. Because this program is agency based, appraisal requests for these types of valuations have significantly declined and therefore, the backlog has decreased exponentially.

Assurance Statement

I concur with the content of the information contained in the Appraisal section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
Debra J. Meisner
Director, Administrative Operations
Office of Appraisal Services

II. INDIAN AFFAIRS

A. TRUST REGULATIONS, POLICIES AND PROCEDURES

Introduction

The Office of Regulatory Management in the Office of the Assistant Secretary – Indian Affairs is responsible for review and revision of all regulations governing Interior’s management of the Indian trust. ORM is separate from OST’s Office of Trust Regulations, Policies and Procedures, whose activities are reported in the OST section of the *Status Report to the Court*.

Current Status

Regulatory Initiative – Phase I of the Regulatory Initiative involves the promulgation of regulations related to probate, probate hearings and appeals, tribal probate codes, life estates and future interests in Indian land, and conveyances of trust or restricted land. During this reporting period, final regulations related to probate, probate hearings and appeals, tribal probate codes, and life estates and future interests in Indian land were published in the Federal Register. See 73 Fed. Reg. 67256 (November 13, 2008). ORM continues to work with SOL and subject matter experts to revise the CFR part regarding conveyances of trust and restricted interests.

Phase III includes tribal consultation and promulgation of regulations affecting leasing, grazing, rights-of-way, trespass and land title and records. Interior expects to begin consultation with Tribes on preliminary drafts of these regulations in CY2009.

25 CFR 200 to 207 – Minerals Leasing, Development, Exploration and Reclamation – These new CFR parts will reorganize and update current provisions related to leasing, development and exploration of minerals to increase user friendliness. A complete draft of these regulations is not expected until CY2009.

Assurance Statement

I concur with the content of the information contained in the Trust Regulations, Policies and Procedures – Indian Affairs section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
Michele F. Singer
Director, Office of Regulatory Management
Office of the Assistant Secretary – Indian Affairs

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III. BUREAU OF INDIAN AFFAIRS

A. FRACTIONATION

Introduction

Fractionation of Indian trust and restricted land results from the federal Indian policy of the 19th century. Fractionation occurs as land passes from one generation to the next, an increasing number of heirs or devisees acquire an undivided interest in the land. This is a complex and potentially emotion-charged issue, due primarily to cultural differences, historical legacy and family associations of the present owners with the original Indian owners of those lands. Efforts to address this complex issue have been coordinated primarily through the BIA Indian Land Consolidation Office, which has sought to help Tribes make use of the opportunities offered by the Indian Land Consolidation Act, as amended in 2004. Although ILCO operated several acquisition projects that purchased undivided interests in highly fractionated tracts and transferred title to the Tribes, ILCP is expected to end during FY2009. ILCP was not funded in the current Interior budget and is using FY2008 carry-over funds to close-out its operations.

Accomplishments

A total of 20 reservations located in six BIA Regions have participated in ILCP.

During this reporting period, ILCP acquired 4,538 fractional interests and 9,268.85 acre-equivalents. Of the total interests acquired, 85% were interests of less than 2% ownership in the respective tracts of land.

Tribes acquired majority ownership in 50 tracts during this reporting period (7,771 total tracts). Tribes also acquired 100% ownership in seven tracts. As a result of ILCP purchases, Tribes now have 100% ownership of 436 total tracts.

Current Status

ILCP continues to conduct an audit of all acquired fractionated interests. The audit will verify landowner intent and sales information, and confirm that ownership changes have been made in TAAMS Title. The audit is expected to be completed by the end of the second quarter of FY2009.

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Fractionation

Assurance Statement

I concur with the content of the information contained in the Fractionation section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 13, 2009

Name: *Signature on File*
Robert R. Jaeger
Director, Indian Land Consolidation Office
Bureau of Indian Affairs

B. PROBATE

Introduction

BIA, OHA and OST must coordinate their work to complete the probates of Indian estates. Information on the status of probates is contained within the ProTrac system. Each BIA regional office and corresponding agency is responsible for encoding new cases, examining “initial load” cases and making corrections.

Current Status

Case Preparation

Case preparation is the initial stage of the probate process. During this stage information is researched and gathered regarding the identity and whereabouts of potential heirs, and an inventory of the trust assets of an estate is prepared. According to ProTrac, 7,575 probate cases are in the case preparation stage.

Case Adjudication

Depending on the complexity of the case or the tribal affiliation of decedents and location of trust lands, probates are adjudicated by ALJs, IPJs or ADMs, or by the District Courts in the State of Oklahoma for estates of the Five Civilized Tribes of Oklahoma and Osage Indians.

According to ProTrac, 5,454 probate cases are in the case adjudication stage. Of those, OHA reported 3,927 cases pending with OHA as of December 31, 2008. As reported by OHA, deciding officials received 1,360 cases and issued decisions in 1,243 cases during this reporting period. The remaining 2,423 cases are pending in the Oklahoma District Courts.

Case Closure

Cases in the closing stage have been adjudicated. During this stage, land ownership information is updated in TAAMS. According to ProTrac, 3,015 cases were pending in the case closure stage. 2,069 cases were closed during this reporting period.

Financial Case Closure

Financial case closure is the distribution of assets after the case has been adjudicated. OST reported that it distributed funds and closed 2,560 accounts in TFAS during this reporting period representing 2,517 estates. As of the end of December 31, 2008, TFAS contained 32,602 open estate accounts, which is a decrease of 491 from the 33,099 open estate accounts at the end of the last reporting period.

Delays and Obstacles

The following obstacles have been identified as having an impact on the progress of the probate program:

- Continued fractionation of ownership of Indian lands;
- Cultural differences regarding the subject of death and funerals; and
- Loss of case preparation personnel/contractors.

Assurance Statement

I concur with the content of the information contained in the Probate section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 13, 2009

Name: *Signature on File*
Adelita Guerue, Acting Director
Probate Division
Office of Trust Services
Bureau of Indian Affairs

IV. OTHER TOPICS

A. INFORMATION TECHNOLOGY

Introduction

This section describes the status of Interior IT systems, particularly trust systems. In addition, this section describes various efforts being made to improve IT security within Interior, pursuant to OMB Circular A-130 Appendix III.

Accomplishments

Staffing:

The Interior CIO position was filled on December 8, 2008.

Policies and Guidance:

- On November 25, 2008, the Interior CIO (acting) issued “Standard POA&M Entry for IT Security Policy Handbook Requirement Regarding Prohibited Use of Personally-Owned Information Systems” to the bureau and office Chief Information Officers. This memorandum requires non-compliant bureaus and offices to incorporate a standardized weakness program-level POA&M entry.
- On November 25, 2008, the Interior CIO (acting) issued “Monthly Vulnerability Scan Reporting for Internet Reconnection” to the BIA, OHTA, OHA, OST and SOL CIOs. This memorandum relieves each of the five bureaus and offices from the monthly Internet reconnection vulnerability scan reporting requirements.
- On November 21, 2008, the Interior CIO (acting) issued “Department of the Interior Response to National Level Incident Reported by the Department of Homeland Security” to the bureau and office Chief Information Officers and bureau and office Chief Information Security Officers. This memorandum requires each bureau and office to supply OCIO with one senior cyber security point of contact throughout the lifecycle of this incident.
- On November 14, 2008, the Interior CIO (acting) issued “Handling Incidents Reported by US-CERT Focused Operations Branch” to the bureau and office Chief Information Officers. This memorandum establishes the procedures for how DOI-CIRC and the bureaus and offices will handle these incidents.
- On October 6, 2008, the Interior CIO (acting) issued “Fiscal Year (FY) 2008 Assurance Statement for Information technology (IT) Security” to the Assistant Secretary – Policy, Management and Budget. This memorandum provides the Interior CIO’s assessment that the management and administrative controls in place provide a reasonable assurance that Interior’s IT security programs and systems are substantially compliant with OMB’s Circular A-123.

Current Status

Prevention and Monitoring:

ESN perimeter security controls, which are the first line of defense, blocked over one million network attacks during the reporting period.

Plan of Action and Milestones:

Interior continues to identify, prioritize, track and correct security weaknesses using the POA&M process. This process includes the proactive identification of weaknesses through self-assessments, independent financial audits and findings based on OIG reports. In order to prioritize resources and remediation efforts, the risk level of each weakness is rated as high, medium or low.

- During the reporting period, Interior reported to OMB that 31 weaknesses were eliminated and 106 new weaknesses were identified and added for trust systems.
- At the end of this reporting period, there were 682 weaknesses associated with trust systems. Of the 682 open weaknesses, 49 (7%) are rated high, 321 (47%) are rated medium and 312 (46%) are rated low.

A-130 Certification and Accreditation:

All trust systems that are currently tracked in DEAR have full ATO or IATO status.

Delays and Obstacles

Like other federal agencies, Interior must address many challenges regarding the integration, performance, funding, security, and data integrity of IT systems. Interior initiated or completed steps to address some of the challenges reported in this and previous reporting periods. However, delays and obstacles listed below impede progress in achieving Interior's IT management goals.

Staffing:

Interior continues to experience high staff and management turnover in critical IT positions, particularly IT security. During this reporting period, the BIA CIO accepted the position as Interior CIO. However, until a replacement BIA CIO is hired, the Interior CIO will continue to serve as the acting BIA CIO as well.

Funding and Resources:

- Limited funding has impacted the ability of Interior to complete projects and meet deadlines.
- As previously reported in the *Status Report to the Court Number Thirty-Two*, Court orders requiring bureaus and offices to maintain email backup tapes for indefinite periods require the acquisition and maintenance of an extremely large volume of expensive backup tape media. This cost burden of approximately \$1.7 million per year on Interior bureaus and offices has diverted funding from other Interior programs.

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Information Technology

Assurance Statement

I concur with the content of the information contained in the Information Technology section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 15, 2009

Name: *Signature on File*
Sanjeev (Sonny) Bhagowalia
Department of the Interior Chief Information Officer

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B. CADASTRAL SURVEY

Introduction

Cadastral surveys provide assurance that land boundaries for individual Indian and tribal trust and restricted lands are identified appropriately. By federal law, surveys of Indian lands are to be performed under BLM's direction and control and in conformity with the rules and regulations under which other public lands are surveyed. Official surveys, whether preexisting or new, identify the location of land boundaries of Indian trust assets and determine official acreage. The official surveys are integral to realty transactions, resource management activities, litigation support and the federal system of patent, allotment and land tenure records maintained by BLM, BIA and local governments. Ownership information, distribution of land-based trust assets, and management of land-based trust accounts may be related to or based upon the information recorded in official surveys.

Accomplishments

Survey Production

BLM approved a total of 32 completed survey projects in Indian Country during this reporting period. These surveys produced 33 plats, 205 miles of survey line and an additional 649 survey monuments in Indian Country.

Certified Federal Surveyor Program

The BLM Cadastral Program deployed the CFedS program in FY2007. During this reporting period:

- There were 692 professional land surveyors enrolled in the CFedS training program, and 203 CFedS certified. There were 47 states represented with licensed surveyors either enrolled or certified in the program.
- The CFedS web site had approximately 18,736 visits and the "Finding a CFedS" page received 17,760 inquiries.
- Forty-nine new professional land surveyors started the program.

Implementation of the FTM

BLM and BIA presented the findings of the TAAMS Spatial Pilot Project to the TESC. The findings identified the workload, cost estimates, and strategy for accurate mapping of trust land tracts. The majority of the anticipated costs are expected to be for legal description research and data clean-up. Upon consideration of the TSPP report, the TESC tasked the OCIO to examine the feasibility of a consolidated, department-wide GIS system to incorporate all cadastral data.

Delays and Obstacles

Funding of the FTM

Proper planning, scheduling and implementation of future FTM work are dependent on funding. The reduced level of funding and delay in enacting Interior's FY2009 appropriation continued to impact negatively the implementation of the FTM initiatives. Planning survey projects involves long-term commitment of professional services. Uncertainty of funding impacts the planning for resources, which increases overall costs.

Assurance Statement

I concur with the content of the information contained in the Cadastral Survey section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 9, 2009

Name: *Signature on File*
Donald A. Buhler
Chief Cadastral Surveyor
Bureau of Land Management

C. MINERALS MANAGEMENT SERVICE

Introduction

Minerals Revenue Management, an MMS program, is responsible for collecting, accounting for, and distributing mineral revenues from both federal and Indian mineral leases, and for evaluating industry compliance with laws, regulations and lease terms. MRM maintains reported information and distributes revenues at the lease level. BIA maintains individual Indian ownership records that are used to provide information to OST for disbursement of the lease revenues to individual Indian beneficiaries.

Current Status

Indian Oil Valuation Rule

MMS expects to address issues regarding the “major portion” calculation for oil produced from Indian leases in a negotiated rulemaking committee. On April 28, 2008, MMS published a Federal Register notice soliciting membership nominations to the committee and requesting comments on the initiative. On December 19, 2008, MMS published a Federal Register notice announcing the organizations from which members may be selected. MMS has drafted the Negotiated Rulemaking Committee Charter and expects to recommend committee members soon. The committee is expected to convene after the charter and membership nominations are finalized.

Overpayments to Allottees

As previously reported, on June 26, 2008, Interior mailed to Navajo individual Indian mineral owners approximately 320 checks containing oil and gas royalty overpayments totaling \$31,246.28. OST, MMS, FIMO and BIA are working together to rectify the situation and to establish controls to mitigate the risk of this type of error occurring again. BIA, working with FIMO, has recouped most of the overpayments from the owners.

Assurance Statement

I concur with the content of the information contained in the Minerals Management Service section of the *Status Report to the Court Number Thirty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: January 8, 2009

Name: *Signature on File*
Jennifer Goldblatt
Chief of Staff
Minerals Revenue Management
Minerals Management Service

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ACRONYMS AND ABBREVIATIONS

1994 Act (or Act) 2007 Plan	American Indian Trust Fund Management Reform Act of 1994 Plan for Completing the Historical Accounting of Individual Indian Money Accounts
A-123	Office of Management and Budget Circular A-123, Management's Responsibility for Internal Control
A-130	Office of Management and Budget Circular A-130 Appendix III
ACSM	American Congress on Surveying and Mapping
ADM	Attorney Decision Makers
AFMSS	Automated Fluid Mineral Support System
AIMS	ActivCard Identity Management System
AIPRA	American Indian Probate Reform Act
AIRR	American Indian Records Repository
ALIS	Alaska Land Information System
ALJ	Administrative Law Judges
ARO	Alaska Region office
ARRTS	Appraisal Request and Review Tracking System
ART	Accounting Reconciliation Tool
AS-IA	Assistant Secretary-Indian Affairs
ASD	Appraisal Services Directorate
ASM	Accounting Standards Manual
ATLAS	AgWare Trust Land Appraisal System
ATO	Authority to Operate
BIA	Bureau of Indian Affairs
BIAM	Bureau of Indian Affairs Manual
BILS	BLM Indian Lands Surveyors
BISS	Box Index Search System
BITSM	Bureau Information Technology Security Manager
BLM	Bureau of Land Management
BOR	Bureau of Reclamation
BPA	Blanket Purchase Agreement
BRM	Business Reference Model
C&A	Certification and Accreditation
CARS	Cadastral Automated Request System
CBS	San Carlos Irrigation Continental Billing System
CDE	Critical Data Elements
CFedS	Certified Federal Surveyor
CFI	Continuous Forest Inventory
CGI	Software vendor successor to TAAMS vendor
CGIS	Cadastral Geographic Information Systems
CI Manual	Coding and Imaging Manual
CIFTA	Certified Indian Fiduciary Trust Analyst
CIFTS	Certified Indian Fiduciary Trust Specialist
CIO	Chief Information Officer

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Acronyms and Abbreviations

CIRC	Computer Incidents Response Center
CISO	Chief Information Security Officer
CISSP	Certified Information System Security Professional
CITE	Certified Indian Trust Examiners
CMS	Credential Management System
COTS	Commercial off-the-shelf
CP&R	Check Payment and Reconciliation
CPIC	Capital Planning and Investment Control
CREUMS	Colorado River Electrical Utility Management System
CSIRC	Computer Security Incident Response Capability
CSIRT	Computer Security Incident Response Team
CSS	Customer StrataStation
CTM	Comprehensive Trust Management Plan
DAA	Designated Approving Authority
DEAR	DOI Enterprise Architecture Repository
DDoS	Distributed Denial of Service
DLRM	DOI Land and Resource Management
DM	Departmental Manual
DMZ	De-Militarized Zone
DNS	Domain Name Server
DOI	Department of the Interior
DOP	Desk Operating Procedure
DoS	Denial of Service
DQ&I	Data Quality and Integrity
DRM	Data Reference Model
EA	Enterprise Architecture
ENA	Eastern Navajo Agency
EORO	Eastern Oklahoma Region office
ERA	Electronic Records Era
ERO	Eastern Region office
ESN	Enterprise Services Network
ETP	Enterprise Transition Plan
FAMS	Facilities Asset Management System
FAR	Federal Acquisition Regulation
FBMS	Financial Business Management System
FFMIA	Federal Financial Management Improvement Act
FIMO	Farmington Indian Minerals Office
FIPS	Federal Information Processing Standards
FISMA	Federal Information Security Management Act
FMFIA	Federal Managers' Financial Integrity Act
FOIA	Freedom of Information Act
FRC	Federal Records Center
FRD	Functional Requirements Document
FTM	Fiduciary Trust Model
FTO	Fiduciary Trust Officer

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Acronyms and Abbreviations

FWS	U.S. Fish and Wildlife Service
GAO	Government Accountability Office
GCDB	Geographic Coordinate Data Base
GIS	Geographic Information System
GLO	General Land Office
GLADS	Great Lakes Agency Database System
GPRO	Great Plains Region office
GPS	Global Positioning System
GSA	General Services Administration
GSS	General Support Systems
HSA	Historical Statement of Account
HSPD-12	Homeland Security Presidential Directive 12
IAM	Indian Affairs Manual
IATO	Interim Approval to Operate
ICR	Internal Control Review
ICRs	Information Collection Requests
IEA	Interior Enterprise Architecture
IFTR	Indian Fiduciary Trust Records
IG	Inspector General
IIM	Individual Indian Money
IITD	Individual Indian Trust Data
ILCA	Indian Land Consolidation Act
ILCO	Indian Land Consolidation Office
ILCP	Indian Land Consolidation Project
IM	Instruction Memorandum
IMDA	Indian Mineral Development Act
InfoDat	Indian Forestry Database
Interior	Department of the Interior
IP	Internet Protocol
IPJ	Indian Probate Judges
IPS	Intrusion Protection System
IPv6	Internet Protocol Version 6
IQCS	Incidence Qualification and Certification System
IRM	Information Resources Management
IRMS	Integrated Records Management System
IRN	Isolated Realty Network
IRS	Internal Revenue Service
ISSDA	Indian Service Special Disbursing Agents
ISA	Information Security Assessment
ISIT	Internal Security Improvements Team
IT	Information Technology
ITARS	Indian Trust Appraisal Request Tracking System
ITIMS	Integrated Transportation Information Management System
ITRS	Indian Trust Rating System
IV&V	independent verification and validation

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Acronyms and Abbreviations

LAN	Local area network
LCTS	Land Consolidation Tracking System
LMS	Learning Management System
LR2000	Legacy Rehost 2000 System
LRIS	Land Records Information System
LTIC	Land Tenure in Indian Country
LTRO	Land Titles and Records Office
MA	Major Application
MAD/LCP	Management Accounting Distribution/Land Consolidation Program
MADS	Management Accounting Distribution System
MMD	Missing Mandatory Documents for Unrestricted Accounts
MMS	Minerals Management Service
MOU	Memorandum or Memoranda of Understanding
MRM	Minerals Revenue Management
MRMSS	Minerals Revenue Management Support System
MWRO	Midwest Region office
NARA	National Archives and Records Administration
NBC	National Business Center
NFR	Notice of Findings and Recommendations
NILS	National Integrated Lands System
NIPTC	National Indian Programs Training Center
NIRMC	National Information Resource Management Center
NIST	National Institute of Standards and Technology
NORC	National Opinion Research Center
NPS	National Park Service
NRO	Navajo Region office
NWRO	Northwest Region office
O&G	Oil and Gas
OAS	Office of Appraisal Services
OCIO	Office of the Chief Information Officer
OHA	Office of Hearings and Appeals
OHTA	Office of Historical Trust Accounting
OIG	Office of the Inspector General
OIP	Office of Information Policy
OISP	Office of IT Security and Privacy
OME	Office of Minerals Evaluation
OMB	Office of Management and Budget
ORM	Office of Regulatory Management
OSM	Office of Surface Mining
OST	Office of the Special Trustee for American Indians
OTFM	Office of Trust Funds Management
OTP	Office of Trust Regulations, Policies and Procedures
OTR	Office of Trust Records
OTRA	Office of Trust Review and Audit
PACER	Payments, Accounting, Claims and Enhanced Reconciliation System

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Acronyms and Abbreviations

PAR	Performance and Accountability Report
PII	Personally Identifiable Information
PIV	Personal Identity Verification
PLSS	Public Land Survey System
PMB	Policy, Management and Budget
PMSO	Project Management Support Office
POA&M	Plans of Actions and Milestones
Post-QA	Post Quality Assurance
PPA	Office of Planning and Policy Analysis
PRIS	Production and Response Information System
PRO	Pacific Region office
ProTrac	Probate Case Management and Tracking System
QA	Quality Assurance
QC	Quality Control
RAF	Recommended Action Forms
RAS	Rangeland Administration System
RDRS	Royalty Distribution and Reporting System
REM	Real Estate Module
RFP	Request for Proposal
RM-PLUS	Risk Management Assessment/Evaluation tool
RMRO	Rocky Mountain Region office
ROCIS	Regulatory Information Service Center/Office of Information Regulatory Affairs Consolidated Information
ROW	Rights-of-Way
SANS	SysAdmin, Audit, Network, Security
SCADA	Supervisory Control and Data Acquisition
SDA	Special Deposit Accounts
SDLC	System Development Life Cycle
SMEs	Subject Matter Experts
SMS	System Management Servers
SOL	Office of the Solicitor
SPRO	Southern Plains Region office
SSA	Social Security Administration
SSAS	Social Services Automated System
SSM	System Security Manager
SSP	System Security Plan
ST&E	Security Test and Evaluation
Statements	Historical Statements of Account
STIGs	Security Technical Implementation Guides
SUS	System Update Servers
SWRO	Southwest Region office
TAAMS	Trust Asset and Accounting Management System
TAP	Technical Architecture Profile
TBCC	Trust Beneficiary Call Center
TESC	Trust Executive Steering Committee

STATUS REPORT TO THE COURT NUMBER THIRTY-FIVE

January 16, 2009

Acronyms and Abbreviations

TFAS	Trust Fund Accounting System
TFR	Trust Fund Receivable
TPMC	Trust Program Management Center
TRAC	Trust Tracking and Coordination
Treasury	Department of the Treasury
TRM	Technical Reference Model
TRO	Temporary Restraining Order
TSPP	TAAMS Spatial Pilot Project
UAT	User Acceptance Testing
US-CERT	United States Computer Emergency Readiness Team
USGS	United States Geological Survey
USPAP	Uniform Standards of Professional Appraisal Practice
VBNS	Very High Performance Backbone Network Service
VPN	Virtual Private Network
WAN	Wide area network
WAU	Whereabouts Unknown
WRO	Western Region office