



Tribal Trust Evaluations Self-Governance Compacts

*“Development of an automated Web-Based
Evaluation Process”*

U.S. Department of the Interior
Office of the Special Trustee for American Indians



Purpose

This briefing presents a new methodology and approach for conducting the annual trust evaluations on tribes and consortiums that compact trust programs under the Indian Self Determination and Education Assistance Act in accordance with 25 CFR 1000.354. The presentation will also include an update on the progress of the new methodology.



Overview

- Trust Evaluation requirement
- Current methodology
- Current Issues
- New methodology
 - Explanation of application content
- Benefits when adopted



Trust Evaluation Requirement

Office of Trust Review & Audit (OTRA) is responsible for conducting trust evaluations on tribes and consortiums that have entered into Compact Agreements and Annual Funding Agreements to administer and manage trust programs (25 CFR § 1000.351).



Current Methodology

- An estimated 100 tribes have compacted trust programs, and that number is expected to grow each year.
- Under the current methodology, OTRA performs on-site evaluations at an average of 23 locations annually.



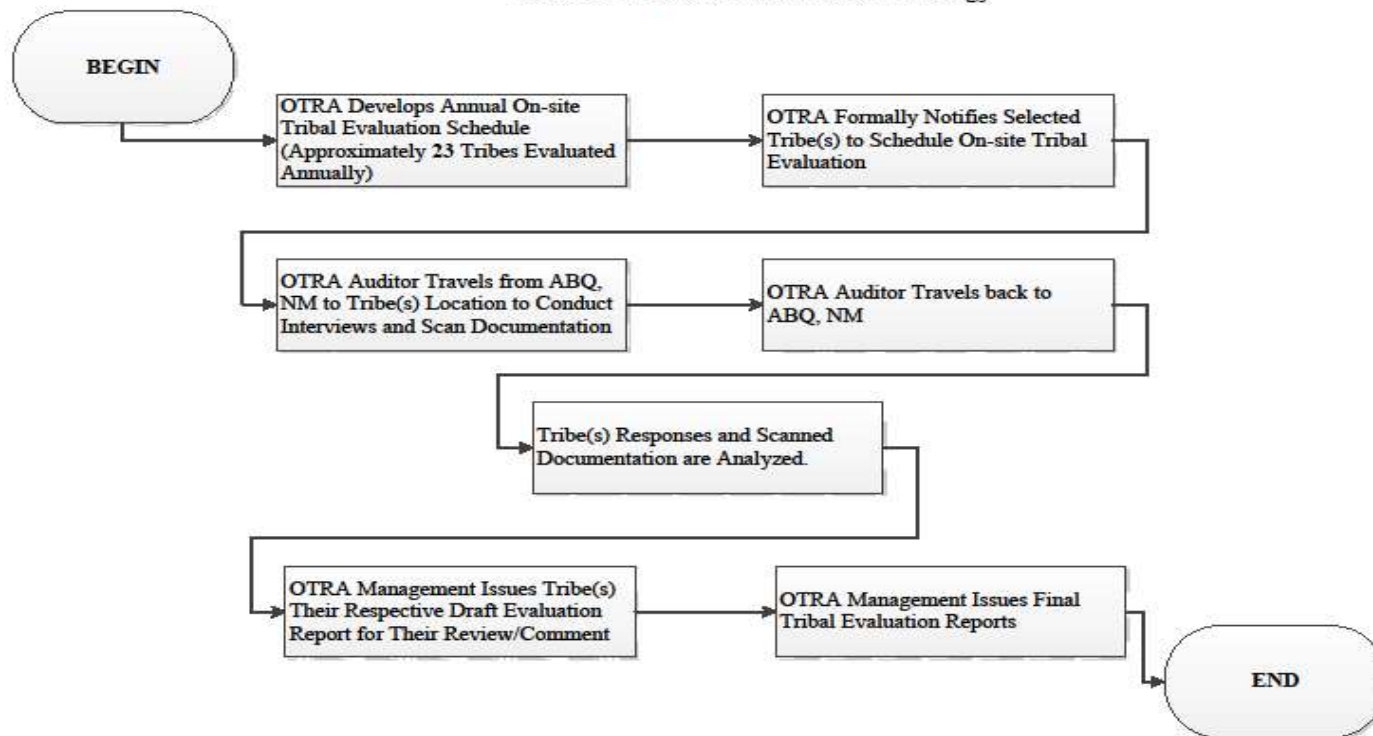
Current Methodology

- For each review conducted, OTRA travels to a tribal location, conducts interviews, requests and reviews documentation on-site.
- Analysis is later performed, a draft report is issued to the tribe, and after comments are considered, a final report is issued.



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CURRENT Tribal Evaluation Methodology





Issues

- Using the current methodology, OTRA is unable to conduct annual reviews on all tribes and consortiums which compact trust programs.
- The current methodology is intrusive on day to day tribal operations.
- Untimely feedback for tribes to improve their trust operations.



Solution

- Through working groups with tribes and consortiums, leverage technology utilizing a web-based application to answer evaluation questions and upload supporting documentation.
- The evaluation questions are designed to assess compliance with fiduciary trust standards as defined by Federal Laws to ensure compliance in administering and managing trust programs and functions.
- The new web-based application tool developed is less intrusive, more efficient, more timely and will assist OST in meeting the annual evaluation requirement.



Methodology Development

- Nine tribes and consortiums have committed to pilot the web-based application tool and provide feedback.
- May 2014, OST created a work group comprised of the following tribes:
 - Salt River Pima-Maricopa Indian Community
 - Confederated Salish & Kootenai Tribes of the Flathead Reservation
 - Muscogee (Creek) Nation
- May 2015, 6 tribes and consortiums were added to the work group:
 - Bristol Bay Native Association
 - Confederated Tribes of Siletz Indians of Oregon
 - Kawerak, Incorporated
 - Native Village of Tanana
 - Oneida Nation of Wisconsin
 - Tanana Chiefs Conference



Methodology Development

- OST developed questions and assigned ratings to potential responses based on risk.
 - The work group reviewed the questions and provided feedback. Additional questions were developed by the group and incorporated.
- An IT Consultant was procured and has developed an Alternatives Analysis, Functional Requirements Document and a Statement of Work for the application.
- A System/Software developer was procured and is currently developing the software, with input from the work group.



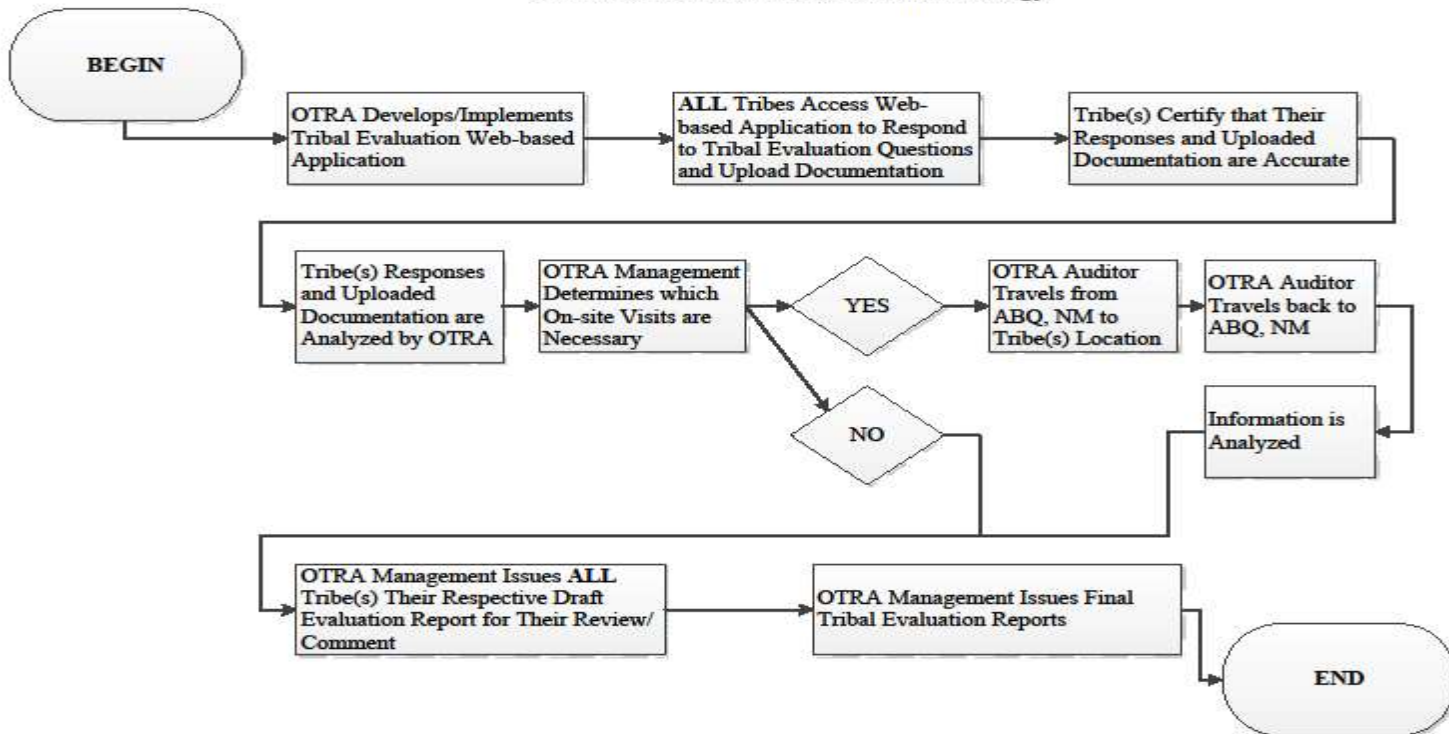
Application Content

- Application guides users through a series of questions based on trust programs compacted and requires documentation to be uploaded.
- Questions assess whether internal controls are designed and operating effectively.
- Questions also assess whether compacted trust functions are performed in accordance with Federal Laws and regulations.
- First stage of application assessment concludes with a management representation letter that responses and documentation provided are accurate and true to the best of the assessor's knowledge.



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PROPOSED Tribal Evaluation Methodology





Indian Trust Rating System

Assessment Example 1 Agriculture

Welcome Michelle,

Not Started

Working

In Review

Pending

Approved

Ready to Certify

1. Do you have the deed for the assigned land? ([25 CFR 1000.355](#)) Yes No

See page 23 of attached Lease

Document:

If answer is NO then the follow up question will not appear. This happens programmatically.

2. How many trust acres are available for grazing? ([25 CFR 1000.355](#))

Enter Comment

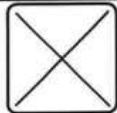
Use Dropdown to pick previously uploaded document

3. Do you have the deed for the assigned land? ([25 CFR 1000.355](#)) Yes No

Enter Comment

SAVE

READY FOR REVIEW



Indian Trust Rating System

Assessment Example 3 Agriculture

Welcome Michelle,

Not Started

Working

In Review

Pending

Approved

Ready to Certify

1. Do you have the deed for the assigned land? ([25 CFR 1000.355](#)) Yes No

Enter Comment

Document:



Error

Requires document selection!

2. How many trust acres are available for grazing? ([25 CFR 1000.355](#))

Enter Numerical Value

Enter Comment

3. Do you have the deed for the assigned land? ([25 CFR 1000.355](#)) Yes No

Enter Comment

SAVE

Ready for Review



Error

Question Not Answered



Indian Trust Rating System

Tribal Coordinator

Assessment Certification

Not Started

Working

In Review

Pending

Approved

Ready to Certify

Welcome Martin

Click Program
to See
Assessment
Details

Click to see
Documents for
this question
and make
Comments

Program	Status	Employee Assigned	Date Started
Agriculture	Working	Jane Doe	1/6/2017
Forestry	Pending	Michael Smith	1/6/2017
Grazing	Pending	John Doe	1/10/2017
LTRO	Pending	John Doe	1/10/2017
Probate	Not Started	John Doe	1/8/2017
Sand & Gravel	Not Started	Michael Smith	1/8/2017



On-site Reviews

- An on-site review will occur if the evaluation identifies a risk area in a trust program which warrants an on-site visit. This will focus only on the identified trust program at risk.



UPDATES -- Projected Timeframes

- May 2015 - June 2015
 - August 2015
 - September 2015 – January 2016
 - April 2016
 - April 2016
 - February 2017 – March 2017
 - March 2017 – September 2017
 - FY 2018
- Third party assessment
I.T. Consultant Award
OTRA site visits to pilot Tribal Methodology
Software development Award
System/Software User design
User Acceptance Testing (9 Pilot Tribes)
Department Approvals (Cloud)
Rollout nationwide



Evaluation of Web-based Tool

OST performed on-site assessments, mimicking the software at nine pilot tribes from August 2015 through January 2016:

- Bristol Bay Native Association
- Confederated Salish & Kootenai Tribes of the Flathead Reservation
- Confederated Tribes of Siletz Indians of Oregon
- Kawerak, Incorporated
- Muscogee (Creek) Nation
- Native Village of Tanana
- Oneida Nation of Wisconsin
- Salt River Pima–Maricopa Indian Community
- Tanana Chiefs Conference



Benefits

- Supports Tribal Sovereignty and Indian Self-Determination Policy
- Strengthens Government to Government relationship
- Leverages modern information technology
- Provides timely feedback
- Management ownership and accountability
- Assists OTRA in compliance with Federal requirement
- Less intrusive



Questions / Comments



Program Management Contact Information

- Elizabeth Wells Shollenberger, OTRA Director (505) 816-1253
Elizabeth_WellsShollenberger@ost.doi.gov
- Cecilia Smith, Management & Program Analyst (Detail) (505) 816-1259
Cecilia_Smith@ost.doi.gov
- Heather Kie, Supervisory Auditor (Detail) (505) 816-1265
Heather_Kie@ost.doi.gov
- Jeremy Rogers, Supervisory Project Manager, (505) 816-1034
Jeremy_Rogers@ost.doi.gov

For additional information, please visit the project website:
www.doi.gov/ost/tribal-methodology

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Thank you!