



Contact Person: Candice Skenandore
Title: Self-Governance Coordinator
Phone Number: xxx-xxx-xxxx
Email:

Tribe:
Evaluation Period: 1/1/2017-12/31/2019
TTE#:

Program Risk Rating:
Performed by:
Questionnaire Conclusion:

Question		Response	Upload Required?	Comments
1	Do tribal employees have access to Trust Asset & Accounting Management System (TAAMS) at the Tribe's location for this particular program?	No	No	
1a	If no, please explain how the Tribe determines land ownership.	TRIBE has a Register of Deeds and completes their own title reports. Tribal, County, and BIA records are reviewed to complete the report. A report is completed for each real estate transaction.	No	
2	Do you maintain a log(s) (or other tracking mechanism) that tracks the status of documents (e.g. Farm and/or Pasture Leases) that encumber trust or restricted land? (25 CFR §1000.355(d)(7))	No	No	Working files are kept in the applicable employee's office.
2a	If yes, please upload a log of approved transactions within scope of review.	N/A	Yes	
3	Do you utilize an internal control to help ensure accuracy in the processing of trust transactions? (e.g. policy, checklist, desk operating procedures) (25 CFR §1000.355(d)(7))	Yes	No	
3a	If yes, please upload what is utilized.		Yes	Leasing Law & Agriculture Leasing Rule
3b	If no, please explain how the Tribe ensures accuracy in the processing of trust transactions.	N/A	No	
4	Is Secretarial approval obtained for all trust transactions? (25 CFR §162.215)	No	No	
4a	If no, under what authority are the trust transactions approved? Upload supporting documentation (e.g. Hearth Act)	Leasing Law which was approved by the Secretary in accordance with the HEARTH Act	Yes	
5	Are trust transactions submitted to the Land, Title, & Records Office (LTRO) to be recorded? (25 CFR §150.6)	No	No	Agricultural leases are short-term and historically have not been recorded with LTRO.
5a	If yes, does the Tribe or the BIA send trust transactions to the LTRO?	N/A	No	
6	Do you maintain originals/copies of all processed/approved documents? (25 CFR §1000.355(d)(7))	Yes	No	
6a	If no, please explain.	N/A	No	

7	Are key duties and responsibilities divided or segregated among different people to reduce the risk of error, waste, or fraud, i.e., conflicts of interest, no one person is allowed to control all key aspects of a transaction? (25 CFR §1000.355(d)(7))	Yes	No	Land Management has been structured to have one employee taking care of one function. Each employee has a Supervisor that oversees and approves their work.
7a	If yes, upload Tribe's policy or desk operating procedures.		Yes	Code of Ethics & Conflict of Interest
7b	If no, please explain.	N/A	No	
8	Do you have a policy that establishes the timeframes for the processing of trust transactions? (25 CFR §1000.355(d)(7))	Yes	No	
8a	If yes, upload a copy.		Yes	Agricultural Leasing Rule
8b	If no, please explain.	N/A	No	
9	Do you utilize Bureau of Indian Affairs (BIA) handbooks for policies & procedures in managing this function/program? (25 CFR §1000.355(d)(7))	No	No	
9a	If no, has the Tribe developed its own policies and procedures?	Yes	No	HEARTH Leasing Law and Agricultural Leasing Rule
9a1	If yes, please upload Tribe's policies and procedures.		Yes	
10	Do you preserve, protect, and manage all fiduciary trust records created and/or maintained by the Tribe during management of trust programs? (25 CFR §1000.355(d)(7); Funding Agreement - Trust Records Management)	Yes	No	
10a	If yes, please explain how fiduciary trust records are preserved, protected, and managed.	All files are entered into OnBase, a records management system that has restricted access to only authorized users.	No	
10b	If no, please explain	N/A	No	
11	Is there a policy and/or procedures that restricts trust records so that only authorized personnel have access to them? (25 CFR §1000.355(d)(7))	Yes	No	
11a	If yes, upload a copy.		Yes	The TRIBE's procedure is to upload documents to the OnBase records management system which only allows access to authorized users.
11b	If no, please explain		No	
12	Do you have an approved National Environmental Policy Act (NEPA) document or decision document for each trust transaction (Environmental review)? (25 CFR §162.213)	No	No	
12a	If no, please explain.	The former Leasing Specialist was not requesting NEPA documents for agricultural leases.	No	
13	Are you aware of any instances of fraud, waste or abuse affecting trust assets/programs?	No	No	
13a	If yes, please explain these instances.	N/A	No	
14	Has an agricultural resource management and monitoring plan (ARMMP) been developed? (25 CFR §162.201)	No	No	
14a	If yes, please upload top page, table of contents and signature page.	N/A	Yes	

15	Have you deviated from the ARMMP? (25 CFR §1000.355(d)(7))	N/A	No	
15a	If yes, how are deviations from the ARMMP documented? Please explain and upload support. (25 CFR §1000.355(d)(7))	N/A	Yes	
16	Does tribal staff send out notifications to direct pay lessee(s) to make payment(s) to the lockbox instead of the decedent? (25 CFR §§162.226 (c)(1))	No	No	
16a	If no, please explain.	Tribe is the lessor in all leases and the lessee directly pays to the Tribe.	No	
17	Is a Fair Market Value Appraisal or waiver utilized for every transaction? (25 CFR §162.211)	No	No	
17a	If no, please explain.	Tribe's Commission sets the per acre lease rate.	No	
18	Does the Tribe have a policy that addresses instances of trespass? (25 CFR §162.023)	Yes	No	
18a	If yes, please upload policy.		Yes	Public Use of Tribal Land Law
18b	If no, explain what the Tribes does in instances of trespass.	N/A	No	
19	Have there been any lease violations? (25 CFR §162.251)	Yes	No	
19a	If yes, please explain the violation(s) and the action taken. (25 CFR §162.251)	Tenant didn't make payments and Tribe terminated the lease.	No	
20	Is a bond collected on all leases? (25 CFR §162.234 & 25 CFR §162.235)	No	No	
20a	If no, please explain.	Leasing Law does not require bonds for agricultural leases.	No	