



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

MANAGEMENT OF SOCIAL SERVICES IN BIA: OPPORTUNITY FOR ACTION




**OFFICE OF
INSPECTOR GENERAL**
U.S. DEPARTMENT OF THE INTERIOR

MAR 18 2013

Memorandum

To: Kevin K. Washburn
Assistant Secretary – Indian Affairs

From: Mary L. Kendall 
Deputy Inspector General

Subject: Final Evaluation Report – Management of Social Services in BIA:
Opportunity for Action
Report No. WR-EV-BIA-0001-2012

This memorandum transmits the results of our final evaluation of the management of social services in the Bureau of Indian Affairs (BIA). Our review concluded that social services to Indians are hindered due to unclear guidance, performance standards, and roles and responsibilities.

We initially planned to determine the extent to which these problems existed and to identify likely remedies. We found, however, that BIA has an organizational streamlining effort underway, which intends to reduce staff, consolidate and close offices, and adjust funding across the Bureau. We believe the effort will likely impact social service programs.

Our report made seven recommendations to strengthen BIA's management of social services. The Indian Affairs' February 4, 2013 response (Appendix 3) indicated concurrence with six of the seven recommendations. Based on that response, we consider Recommendations 1 through 5 and 7 resolved but not implemented. We will refer these recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation. We request reconsideration of and provide additional information concerning Recommendation 6.

We conducted this evaluation in accordance with "Quality Standards for Inspections" by the Council of Inspectors General on Integrity and Efficiency. We believe that the work we performed provides a reasonable basis for our conclusions and recommendations.

We respectfully request a written response to this report within 30 days. The response should provide information detailing actions taken or planned specifically to address Recommendation 6, as well as the officials involved and target dates for implementation.

Please address your response to —

Ms. Kimberly Elmore
Assistant Inspector General for Audits, Inspections, and Evaluations
U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428
1849 C Street, NW.
Washington, DC 20240

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit reports issued, actions taken to implement our recommendations, and recommendations that have not been implemented.

If you have any questions about this report, please contact me at 202-208-5745.

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Results in Brief

The Bureau of Indian Affairs (BIA) funds tribal social services programs in the form of direct services or through contracts or other agreements that allow tribes to administer social services to members. Program funding for direct services and contracts is approximately \$137 million annually. More than half (\$75 million) goes toward welfare assistance; the remaining funds are applied to staffing and support.

To help improve BIA operations, including social services, BIA contracted for independent studies in 1999 and again in 2012. The two reports that resulted from these contracts revealed a history of inadequate communication throughout BIA. These communication issues, as identified by the reports, pertained to inconsistent or obsolete guidance, unclear roles and responsibilities, and inadequate performance standards in BIA. The Office of Inspector General found much the same when we evaluated BIA's social services program—unclear guidance, performance standards, and roles and responsibilities, which undermined fulfillment of duties throughout the Bureau.

We found inadequate communication among managers, staff, and tribes, which was demonstrated by the absence of clear instructions for data calls, inability to share social service information across all necessary BIA social service channels, and non-responsiveness to welfare assistance applicant funding requests. Such inadequate communication has hindered effective functioning of social services. It also diminished our ability to determine if BIA's social service program was effectively administered, if cases were adequately managed, if Bureau-level social services data were accurate or reliable, and if tribal members applying for social services were receiving what they needed.

We planned to conduct an evaluation to determine the extent to which these problems existed and to identify likely remedies. We found, however, that BIA has a major organizational streamlining effort underway that will continue into fiscal year 2013. The intention of the effort includes reducing staff, consolidating and closing offices, and adjusting funding across BIA. Given the scale of this streamlining effort, we believe BIA could benefit from the findings and recommendations in this report, and we are therefore providing our data early, with the intention of benefitting BIA's streamlining process.

Our recommendations focus on updating social services guidance and ensuring that such guidance is consistently available through the creation of a one-stop communication area, such as a dedicated Web site, from which all BIA staff and tribal members can determine where to get needed information and technical services. We also recommend the development of an outcome-based performance approach, which not only would clarify roles and responsibilities at all levels of BIA but also would define expected outcomes. Such actions, we believe, could

help diminish communication issues, reveal areas of duplication and inconsistent practices, and assist BIA as it undergoes its current organizational streamlining.

Introduction

Objective

Determine if the Bureau of Indian Affairs (BIA) has established well-defined roles and responsibilities to deliver social services programs and if it has effectively communicated them, along with providing adequate support and oversight, to BIA-managed or tribally contracted social services programs (see Appendix 1 for report scope and methodology).

Background

According to the BIA budget justification, the Bureau provides or funds social services to improve the quality of life for individual Indians who live on or near Indian reservations and to protect children, the elderly, and the disabled from abuse and neglect. About 1.9 million individuals who are members of the 566 recognized tribes have access to social services programs, such as welfare and child assistance. These services are critical because of factors ranging from high unemployment to child abuse.

Unemployment rates are high in Indian communities. BIA cited a 49 percent unemployment rate in a 2005 report¹. Of those who were employed, 33 percent earned wages below the poverty level. One tribe we visited reported 76 percent unemployment. Rural isolation, low wages, and lack of economic development in Indian Country contribute to high unemployment. Furthermore, National studies indicate that children in families living at or below National poverty levels are at a higher risk of removal from their homes due to abuse and neglect. This affects the approximately half million Indian children aged 16 or younger.

BIA social services funding, used to help ameliorate these issues, is included in the Bureau's human services budget component. In 2011, the human services budget identified \$75 million for direct welfare assistance to individuals. This money covered general, child, emergency, and burial assistance, as well as adult custodial care. Social services funding for administrative staffing, support, and oversight totaled \$49 million.

Social services funding reaches individuals either directly from BIA through its network of agency offices or through tribes that elect to enter into formal agreements with BIA to provide services to their members. The BIA regional offices provide oversight and training to BIA agency offices and tribal offices that perform daily social services activities. These include assessing individual and family eligibility and need, processing case plans, distributing welfare assistance, responding to child abuse and neglect allegations, managing supervised Individual

¹ As required by Public law 102-477, the Department of the Interior is supposed to produce a report, not less than biennially, on the American Indian and Alaska Native population and labor force, which includes but is not limited to those eligible for services by gender, age, availability for work, and employment. BIA last published this report in 2005.

Indian Monies accounts,² and working with local law enforcement. To ensure qualification for BIA social services financial assistance, BIA staff first assists clients to complete applications from other local, state, or Federal assistance sources to ensure that applicants do not qualify for any other programs before requesting BIA funds.

BIA has longstanding problems with its administrative structure, as documented by independent reports issued in 1999 and in 2012.³ Both documents revealed that BIA had inconsistent or obsolete guidance, unclear roles and responsibilities, and inadequate performance standards.

In 2012, BIA initiated an organizational streamlining plan to significantly downsize its workforce. This effort will be completed in fiscal year (FY) 2013 and is expected to reduce staff, consolidate and close offices, and adjust funding. These broad-range changes will undoubtedly impact social services, although the extent of the impact is not yet known.

² These accounts were established for minors and others needing assistance.

³ “A Study of Management and Administration: The Bureau of Indian Affairs by the National Academy of Public Administration” in 1999 and “U.S. Department of Interior – Indian Affairs Final Report: Examination, Evaluation, and Recommendations for the Support Functions” by Bronner Group, LLC, in 2012.

Findings

We initially sought to determine whether BIA or tribes have effectively implemented and complied with all applicable social services laws and internal policies. After visiting their offices, however, we refined our objective to determine whether BIA had established clearly defined roles and responsibilities to deliver social services programs, if it had effectively communicated them, and if it had provided adequate support and oversight to BIA-managed or tribally contracted social services programs. When we learned of BIA's organizational streamlining plan and its anticipated impacts, however, we decided to report what we had learned to date and offer recommendations that might prove helpful during the Bureau's streamlining efforts.

The BIA official leading the streamlining effort told us that he did not know how the resulting changes from streamlining would affect the delivery of social services. His primary focus, he said, was on meeting the number of early outs or buyouts needed, then letting the regions determine how to manage the resulting changes. BIA calculated that streamlining goals could be met if 300 fulltime employees took an early out or buyout, and if office, staffing, and program consolidations were made. The current streamlining effort resulted from a \$14.5 million budget reduction in BIA's FY 2013 budget justification.

Nonexistent Guidance

BIA and tribal social services staff prepare, authorize, and document various social services activities as part of their daily activities. Some tribes reported frequent vacancies and staff turnover in social services programs and mentioned a need for BIA to provide basic guidance and supporting materials to ensure continuity of services throughout tribal communities. We found, however, that no current standard guidance exists for BIA social services programs.

The most recent version of BIA's manual section on social services expired during the 1990s and has not been updated. Not only is the section outdated, but significant regulatory changes occurred in 2000 that further render the manual obsolete.

BIA agency and regional offices and tribes have resorted to using relevant Code of Federal Regulations (CFR) sections, previous training material, or their own versions of guidance to administer the social services program. One regional official explained that the CFR alone is insufficient because State requirements also must be followed. He further stated that having updated standard procedures for social services would be a "great achievement." Staff at another regional office echoed the need for a new social services procedures manual. BIA's headquarters office considers each office unique in its staffing and demographic structure, and therefore does not foresee generating Bureau-wide social services

guidance. We believe, however, that a common level of guidance is relevant to all social services program activities.

Recommendation

- I. We recommend that BIA update its Bureau manual to include minimum requirements for delivering social services and that the manual be used across regions and offices to standardize delivery systems.

Unclear Roles and Responsibilities

Providing a clear definition and understanding of the various roles and responsibilities of BIA and tribal management and staff is critical to effective direction and execution of social services programs. Clear roles and responsibilities help all parties understand what is expected of them and prevent misunderstandings that may inhibit the effective, consistent delivery of social services to those in need.

We found that BIA social services roles and responsibilities are not standardized. Technical support is one area where roles and responsibilities remain unclear, as demonstrated by BIA's social services contracts with tribes. The contracts, or annual funding agreements, state that BIA will provide technical support with social services issues as needed. Contrary to these agreements, we uncovered reports of insufficient or nonexistent technical support. In some cases, tribes could wait up to 3 weeks before receiving a response, or they might receive no response at all. One tribe remarked, "It is sink or swim out here." As a result of past difficulties, this tribe does not communicate with the BIA regional office unless absolutely necessary.

We also found that BIA staff provided inconsistent support to tribes across regions, with some regional staff spending more time with tribes than other regions. Some tribes reported positive relationships with BIA, including one tribe that had regular contact with its BIA agency office and received monthly in-person visits. On the contrary, several tribes we visited seemed to have contentious relationships with BIA's regional office officials, including one that told us: "BIA does not freely provide information and knowledge, but they easily make review [sic] criticisms." In addition, we learned that, depending on the region, some staff respond to tribal telephone inquiries more quickly than others. Some BIA social services staff believe, however, that tribes under contractual agreements should not request BIA support after they have contracted to provide their own social services programs.

One tribe for whom BIA provides social services told us that they do not understand the roles of the BIA agency office and the BIA regional office. This tribe works with its local agency office, but has encountered interference from the

BIA regional office. In one instance, the agency made a decision to provide services to a client, but the regional office heard about it and terminated the action. The tribe felt the regional office made the wrong decision.

Staff of a BIA agency office that provides services to a tribe recounted a situation when the agency decided to pay for a client's treatment but the regional office did not approve. The agency's payments required regional office approval, but the agency office did not understand why its superintendent did not have approval authority. We were told that ultimately the agency's superintendent overruled the regional office and made the payment.

Inconsistency characterizes all aspects of BIA social services programs, stemming, as stated earlier, from the absence of a manual that defines overall roles and responsibilities. Such an observation also was noted in independent contractors' reports issued in 1999 and 2012. The 1999 report noted the absence of up-to-date policies or manuals and stated: "[T]o gain discipline in the workforce, individual employees need to understand the requirements of their job." The 2012 report noted: "Communication between divisions within Indian Affairs is inconsistent or needs to be improved, as does the clarity of individual roles and responsibilities for senior executives and managers."

Another area of inconsistency is training, which varies across regions and across tribes. Training may be either inadequate or nonexistent and include insufficient advance notice. One tribe recollected only 1-day advance notice for a training opportunity at the BIA regional office, located more than 100 miles away. The tribal representative said that it is simply impossible for staff to adjust their schedules and make travel plans on such short notice. This tribe also indicated that the regional office used to invite all regional tribes to an annual meeting, but now these helpful meetings are no longer conducted; the tribe did not know why. On the contrary, another BIA regional office hosts 2 weeks of annual training for its agency offices and tribes, and also incorporates Internet delivery methods for other trainings to save on travel costs.

Anecdotal data from another tribe includes a report that it received only 1½ hours of training from BIA when the tribe took over its social services program via a new contract. The tribe considered this typical of the regional office's attitude that once a tribe contracts its own social service program they should not need support from BIA.

Data calls are another area of inconsistency. A tribe generally knows what to report to BIA, based on the terms of its contract. From time to time, however, BIA makes unexpected data requests for information outside of contract requirements and provides inadequate lead time to provide a response. One tribe reported that BIA at times requests reports or information with very little advance notice, which is a burden on the staff. It also noted that BIA did not respond to its request for an explanation of how to complete the requested reports.

Of the various forms of communication (oral, written, interpersonal), perhaps the most critical area for BIA to demonstrate clear roles and responsibilities is in the area of effective written communication. BIA's decisions concerning its manual prevents this guidance document from being accessible to all levels of social services providers, particularly when Internet tools make such documents globally available and searchable. BIA's current organizational streamlining efforts and its anticipation of downsizing, repositioning, and consolidating work responsibilities provide opportunities to clearly communicate the new and revised roles and responsibilities expected of social service providers and users.

Recommendations

We recommend that BIA:

2. Establish clearly defined roles and responsibilities for delivering social services when updating its Bureau manual;
3. Create a training plan for tribes that addresses points of contact, roles and responsibilities, technical information and program administration;
4. Specify reporting requirements in the contract and provide ample time to tribes when requesting additional data; and
5. Create a central Internet "go-to" location where up-to-date information is regularly available to BIA regional and field offices and tribal office staffs on a regular basis.

Undefined Program Performance

As BIA streamlines its workforce, it needs to determine how to deliver future social services programs. Current streamlining plans, however, do not address the program level changes that it expects to make throughout the current and the next fiscal years. We believe it is important that BIA benchmark social services activities that are working effectively so that the benchmarked activities can be modeled throughout the organization as it changes, downsizes, consolidates, and relocates staff and services. We noted three promising practices that could help BIA to deliver more clearly defined program performance.

We found that when a tribe contracts to provide social services previously covered by its BIA agency office, the Bureau no longer maintains social services staff expertise at that agency level. Although located at a greater distance from the tribe, the regional office typically assumes this role. This seems to exacerbate tribal/BIA communication problems. The Blackfeet Tribe encountered this situation but, to its credit, the BIA Blackfeet Agency created a new role for itself

and now performs as a social services intermediary between the Tribe and BIA's regional office. The BIA Agency superintendent told us: "The agency is committed to helping the Tribe succeed in the contract."

Two other activities also seem worthy of consideration for widespread use. In the first instance, BIA's Crow Agency and Northern Cheyenne Agency chose to participate as part of a differential response team⁴ that included people from the Federal Bureau of Investigations, the U.S. Attorney's Office, tribal prosecutors, tribal civil protection, and local medical personnel. The team defined its goal as helping to stop the cycle of abuse at all levels of the tribe—within families as well as among community members. Such an effort clearly fits the purpose of BIA's social services programs but it also uses the joint strength of other disciplines to deliver responsive, coordinated, timely, and highly professional services.

In our second example, BIA's Crow agency chose to address tribal issues by incorporating an equine therapy program in its social services treatment options. Equine therapy, a form of therapy in which individuals work with horses on a daily basis to learn personal responsibility for themselves and others, can be especially useful in a tribal setting where horses are a respected component of cultural traditions. Such programs, in this case to reduce the impacts of drug addiction, provide multiple levels of social service assistance for tribes.

These best practices, however, are juxtaposed against weaknesses in BIA's ability to report outcomes of social service program efforts. BIA social service programs should have the capacity to evaluate service delivery to vulnerable tribal populations through outcome monitoring based on performance targets. We found, however, that BIA is unable to demonstrate program performance through its current performance structure.

Performance measures need to be identified as outcomes of the three current social services goals that BIA has identified under the Government Performance and Results (GPRA) Modernization Act of 2010 to link budget dollars to agency performance. Current BIA GPRA goals measure output and include percentage of Individual Indian Money reviewed, percentage of recipients who complete goals identified in individual self-sufficiency plans, and percentage of improvement in processing Indian Child Welfare Act cases.⁵

We found no evidence of outcome-based performance metrics that account for improved welfare or health of tribal members as a result of social services

⁴ Differential response is a Child Protective Service practice that allows for more than one method of initial response to reports of child abuse and neglect. Also called "dual track," "multiple track," or "alternative response," this approach recognizes variation in the nature of reports and the value of responding differently to different types of cases.

⁵ The Indian Child Welfare Act includes language that is intended to prevent the separation of Indian families and assists in family reunification.

programs. As a result, we were unable to assess whether social services funding is helping the communities it is designed to serve.

Recommendations

We recommend that BIA:

6. Benchmark those elements of its social services program that work well and can serve as a model to others; and
7. Develop a performance plan that includes outcome-based goals and measures that can be used in its streamlining efforts and decision-making process and work with DOL's Office of Planning and Performance Management to institute outcome-based performance measures for the social services program.

Conclusion and Recommendations

Conclusion

BIA faces a significant challenge as it attempts to streamline its workforce by FY 2013, following a proposed \$14.5 million budget reduction that also will impact its social services efforts. In a climate that values regional and tribal independence, BIA has sanctioned administrative actions that change according to regional and tribal authority but that also confuse recipients and administrators alike because they lack consistent rules and regulations governing individuals and activities. In such a climate, streamlining that establishes common processes and simplifies procedures throughout Indian Country becomes challenging at best.

We believe that, to make the most of its current streamlining activity, BIA needs to improve its Bureau-wide communications through consistent guidance documents, a Web-based environment where this guidance is equally available to all, and a way to capture or benchmark best practices that can help deliver the social services programming identified in the Bureau's performance plan. Our evaluation was the third in more than 10 years to cite a need for improved communications. Absent BIA's improvement of its communication culture during its streamlining efforts, the delivery of social services to tribal members will continue to be hindered, as will BIA's ability to accurately evaluate the quality of social services it provides.

Summary of Recommendations

We recommend that BIA:

1. Update its Bureau manual to include minimum requirements for delivering social services and that the manual be used across regions and offices to standardize delivery systems.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented.

2. Establish clearly defined roles and responsibilities for delivering social services when updating its Bureau manual.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented.

3. Create a training plan for tribes that addresses points of contact, roles and responsibilities, technical information and program administration.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented.

4. Specify reporting requirements in the contract and provide ample time to tribes when requesting additional data.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented.

5. Create a central Internet “go-to” location where up-to-date information is regularly available to BIA regional and field offices and tribal office staffs on a regular basis.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented.

6. Benchmark those elements of its social services program that work well and can serve as a model to others.

BIA Response: BIA did not concur with this recommendation, stating that benchmarking was not appropriate due to the nature of program appropriations, lack of resources, and tribal cultural nuances.

OIG Reply: We consider this recommendation unresolved and ask that BIA reconsider its response to this recommendation. We believe that benchmarking program elements that work well and can serve as a model to other tribal communities is an essential requirement of performance management. As BIA illustrated in its response to Recommendation 7, it has already committed to gathering baseline data in an effort to develop outcome-based goals and measures. Its data gathering efforts could serve to benchmark social service program successes.

7. Develop a performance plan that includes outcome-based goals and measures that can be used in BIA’s streamlining efforts and decision-making process and work with DOI’s Office of Planning and Performance Management to institute outcome-based performance measures for the social services program.

BIA Response: BIA concurred with this recommendation.

OIG Reply: We consider this recommendation resolved but not implemented. As stated in the body of this report, we suggest that BIA work with DOI's Office of Planning and Performance Management to institute outcome-based performance measures for the social services program.

Appendix I: Scope and Methodology

Scope

We performed our evaluation in accordance with The Council of the Inspectors General on Integrity and Efficiency (CIGIE) Quality Standards for Inspections. We believe that the work performed provides a reasonable basis for our conclusions and recommendations. Our scope included all BIA region and agency offices and all recognized tribes that received social services funding either directly from BIA or through a contract agreement.

Methodology

To perform our review, we —

- reviewed all applicable laws, rules and regulations, and BIA policies related to social services;
- interviewed BIA and tribal officials regarding social services processes and policies; and
- visited the BIA central office, select regional and agency offices, and select tribal social services offices (see appendix 2).

Appendix 2: Sites Visited

BIA Sites Visited	Tribal Sites Visited
Headquarters Office Washington DC	Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation Nixon, NV
Pacific Regional Office Sacramento, CA	Paiute-Shoshone Tribe of the Fallon Reservation and Colony Fallon, NV
Western Region Office Phoenix, AZ	Kiowa Tribe Carnegie, OK
Rocky Mountain Region Office Billings, MT	Cheyenne and Arapaho Tribes Concho, OK
Western Nevada Agency Carson City, NV	Seminole Tribe of Oklahoma Wewoka, OK
Anadarko Agency Anadarko, OK	Blackfeet Tribe Browning, MT
Blackfeet Agency Browning MT	Navajo Nation Window Rock, AZ
Northern Cheyenne Agency Lame Deer, MT	San Carlos Apache Tribe San Carlos AZ
Crow Agency Crow Agency, MT	Tohono O'odham Nation Sells, AZ

Appendix 3: BIA Response

The Bureau of Indian Affairs' response to our draft report follows on page 17.



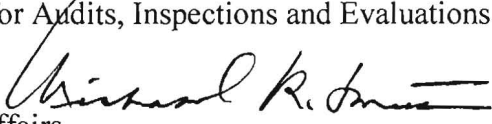
United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, DC 20240

FEB 04 2013

Memorandum

To: Kimberly Elmore
Assistant Inspector General for Audits, Inspections and Evaluations

From: *for* Michael S. Black
Director, Bureau of Indian Affairs 

Subject: Draft Evaluation Report - Management of Social Services in BIA: Opportunity for Action Report No. WR-EV-BIA-0001-2012

Indian Affairs appreciates the opportunity to comment on the Office of Inspector General Draft Evaluation Report - Management of Social Services in BIA: Opportunity for Action. Indian Affairs provides the following response to the report's recommendations.

Recommendation #1

We recommend that BIA update its Indian Affairs Manual to include minimum requirements for delivering social services and that the manual be used across regions and offices to standardize delivery systems.

Response:

Indian Affairs concurs with recommendation number 1.

The Division of Human Services in collaboration with the Office of Regulatory Affairs & Collaborative Action will update the Indian Affairs Manual to include current program directives including citations to regulatory and statutory requirements; policy directives; and memorandums for the delivery of Social Services programs. The information will be uploaded to the BIA internet at www.bia.gov.

Responsible Party: Chief, Division of Human Services

Target Date: August 31, 2013

Recommendation #2

Establish clearly defined roles and responsibilities for delivering social services when updating its Bureau manual.

Response:

Indian Affairs concurs with recommendation number 2.

The Division of Human Services in collaboration with the Office of Regulatory Affairs & Collaborative Action will develop policy guidance that defines clearly the roles and responsibilities for delivering each of the social services programs. These updated role delineations will be included in the Indian Affairs Manual and on the BIA internet at www.bia.gov.

Responsible Party: Chief, Division of Human Services

Target Date: August 31, 2013

Recommendation #3

Create a training plan for tribes that addresses points of contact, roles and responsibilities, technical information and program administration.

Response:

Indian Affairs concurs with recommendation number 3.

The Division of Human Services and BIA Regional Social Workers will develop a standard training plan for staff of both tribally operated social services programs and BIA-operated programs. The training plan will address points of contact, technical information and program administration. The training plan will incorporate both in-person training and web-based training options.

Responsible Party: Chief, Division of Human Services

Target Dates: Training Plan Developed: August 31, 2013

Web Based Training Prepared: December 31, 2013

Web Based Training Completed: April 30, 2014

Recommendation #4

Specify reporting requirements in the contract and provide ample time to tribes when requesting additional data.

Response:

Indian Affairs concurs with recommendation number 4.

The Division of Human Services in collaboration with the Indian Self-Determination Office will develop a list of routine social service reporting requirements to be included in Indian Self-Determination Act (ISDA) contracts. This will include the reporting requirements for the Government Performance Results Act, the Financial Assistance and Social Services Report (FASSR) and the Indian Child Welfare Act (ICWA) annual report. BIA will negotiate with Tribes during annual ISDA contract negotiations to include the specific social services reporting requirements in their ISDA contracts. However, the BIA cannot force Tribes to include these provisions which are not in the model ISDA agreement. 25 U.S.C. § 450 l(a)(2). In addition, there are instances where data calls are made by the Congress, Office of Management and Budget, Federal Emergency Management Agency, or the Secretary of the Interior, and the timeframes for response by the Tribes are set by the requesting Agency and are outside the control of the BIA. The Division of Human Services will work with the Indian Self

Determination Office to develop language for (ISDA) contracts to cover unexpected data requests.

Responsible Party: Chief, Division of Human Services

Target Date: December 31, 2013

Recommendation #5

Create a central Internet “go-to” location where up-to-date information is regularly available to BIA regional and field offices and tribal office staffs on a regular basis.

Response:

Indian Affairs concurs with recommendation number 5.

The Division of Human Services will begin utilizing the BIA website, www.bia.gov, as a “Go-To” location for tribally-operated programs and BIA agencies to find current program information on the various social services programs. The Division of Human Services will post program policies and regulatory and statutory requirements of the programs on the website.

Responsible Party: Chief, Division of Human Services

Target Date: August 31, 2013

Recommendation #6

Benchmark those elements of its social services program that work well and can serve as a model to others.

Response:

Indian Affairs does not concur with recommendation number 6.

The particular activities cited in the report are not appropriate for benchmarking. The Division of Human Services received a special appropriation to support the development and implementation of locally designed and tribally driven social services programs for Methamphetamine prevention in one BIA region. It was anticipated the Division of Human Services would receive, annually, additional appropriations under the same initiative to support other Tribes developing their own programs, but this did not occur.

At this time, the Division of Human Services does not have the resources to support special initiatives. The current appropriations received by Tribes are used to support the administrative costs of operating the social services programs. The funding just provides for minimal staffing and limits the flexibility for the Tribes to develop innovative programs such as those described in the report. Additionally, the results cited in the report could potentially mislead the public to believe that the specialized programs can be replicated without additional financial resources.

Finally, to benchmark these programs that were designed by individual Tribes and attempt to apply them to other Tribes could be culturally inappropriate. Each Tribe has its own tribal laws, customs, and traditions and the BIA must be respectful of this. The intent of the initiative was to ensure each Tribe had the necessary resources to develop innovative services to incorporate its

unique customs and traditions while addressing the needs of its community to combat Methamphetamine abuse. Even if we benchmark these tribally driven programs in one area, there is no guarantee they would be successful or appropriate for another Tribe.

Responsible Party: Chief, Division of Human Services

Recommendation #7

Develop a performance plan that includes outcome-based goals and measures that can be used in BIA's streamlining efforts and decision-making process.

Response:

Indian Affairs concurs with recommendation number 7.

The Division of Human Services will develop a performance plan with outcome-based goals and measures within six months. The Division of Human Services will then work to implement the outcome-based goals and measures identified in the performance plan after consultation with tribes. The implementation will also require the program to gather baseline data related to the goals and measures developed. It will take approximately 18 to 24 months for the Division of Human Services to fully implement new outcome based performance goals and measures. It is also important to note, that the BIA's streamlining efforts are in its final stages for implementation, and likely to be complete before the Division of Human Services' develop its draft performance plan. It is unrealistic at this time, to utilize the performance plan in the BIA's streamlining efforts.

Responsible Party: Chief, Division of Human Services

Target Date: Develop a Draft Plan: July 31, 2013

Fully Develop a Performance Plan, November 30, 2014

Appendix 4: Status of Recommendations

In response to our draft report BIA concurred with Recommendations 1 through 5, and 7. BIA did not concur with Recommendation 6. We consider Recommendations 1 through 5, and 7 resolved but not implemented. We request reconsideration of and additional information concerning Recommendation 6. The table below summarizes the status of the recommendations.

Recommendations	Status	Action Required
1 – 5, 7	Resolved but not implemented.	No further response to the Office of Inspector General is required. The recommendations will be referred to the Assistant Secretary for Policy, Management and Budget for tracking.
6	Recommendation unresolved. Request reconsideration and additional information.	Reconsider recommendation and provide a plan for completing the action, including target dates and official (s) responsible.

Report Fraud, Waste, and Mismanagement



Fraud, waste, and mismanagement in Government concern everyone: Office of Inspector General staff, departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to departmental or Insular Area programs and operations. You can report allegations to us in several ways.



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