

INDIAN AFFAIRS MANUAL

1.1 Purpose. This chapter establishes the Bureau of Indian Affairs’ (BIA) policy for its Data Governance Program (the Program), which is managed by the BIA’s Associate Chief Data Officer (ACDO). The Program provides guidance and recommendations regarding the adoption of, and compliance with, Department of the Interior (DOI) data management policies, procedures, and guidelines. The Program utilizes evidence-based decision support and data as a strategic asset to facilitate BIA’s compliance with data management objectives.

1.2 Scope. This policy applies to all programs and offices under the authority of the BIA.

1.3 Policy. It is this policy of BIA to ensure compliance with all applicable data-related regulations, requirements, and standards, and to promote sustainable data management practices to facilitate the mission of BIA.

1.4 Authority.

A. Statutes and Regulations.

- 1) Public Law (P.L.) 93-579, Privacy Act of 1974
- 2) P.L. 106-554 - Section 515, Information Quality Act
- 3) P.L. 113-101, Digital Accountability and Transparency Act of 2014
- 4) P.L. 113-283, Federal Information Security Modernization (FISMA) Act of 2014
- 5) P.L. 115-435, OPEN Government Data Act (Title II of the Foundations for Evidence-Based Policymaking Act of 2018)
- 6) 32 CFR Part 2002, Controlled Unclassified Information (CUI)
- 7) 5 U.S.C. § 552, Freedom of Information Act
- 8) 43 U.S.C. 46, Geospatial Data
- 9) 44 U.S.C. 31, Records Management by Federal Agencies

B. Guidance.

- 1) Executive Order (EO) 13556, the Controlled Unclassified Information, 2010

INDIAN AFFAIRS MANUAL

Part 78
Chapter 2

BIA – Other Programs
Data Governance

Page 2

- 2) Office of Management and Budget (OMB) Memorandum M-19-23, Phase I Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance, July 10, 2019
- 3) OMB Memorandum M-13-13, Open Data Policy-Managing Information as an Asset, May 9, 2013
- 4) OMB Memorandum M-11-03, Issuance of OMB Circular A-16 Supplemental Guidance, November 10, 2010
- 5) OMB Circular A-16, Coordination of Geographic Information and Related Spatial Data Activities
- 6) OMB Circular A-130, Managing Information as a Strategic Resource
- 7) DOI Office of the Chief Information Officer (OCIO) Directive 2022-001, Open Data and Enterprise Data Inventory Requirements, October 12, 2021
- 8) DOI OCIO Memo, Data Sharing Policy May 8, 2023
- 9) DOI OCIO Memo: Risk Managed Use of Generative Artificial Intelligence, August 9, 2023
- 10) National Institute of Standards and Technology (NIST) Special Publication 800-53 Revision 5, Security and Privacy Controls for Information Systems and Organizations, 2020
- 11) National Archives and Records Administration (NARA) Bulletin 2015-04, Metadata Guidance for the Transfer of Permanent Electronic Records
- 12) Data Management Association (DAMA) Data Management Body of Knowledge (DMBOK), 2nd Edition

C. Handbooks.

- 1) Federal Geographic Data Committee: National Geospatial Data Asset Management Plan, 2014
- 2) Federal Data Strategy: Data Governance Playbook, July 2020

1.5 Responsibilities.

- A. Director, Bureau of Indian Affairs (DBIA)** serves as the Senior Accountable Official for the BIA Data Governance Program, and is responsible for:
- 1) ensuring the appropriate organization arrangements, resources, and personnel are available to implement and maintain support for the Program;
 - 2) developing policy and guidance using best practices for data efforts, in coordination with all stakeholders;
 - 3) participating in Senior Executive data governance and coordination activities to promote common, consistent, and effective data governance programs and policies;
 - 4) ensuring the appropriate authorities for BIA data management are delegated to the BIA ACDO;
 - 5) ensuring the Program objectives and policies are clear, available, and understood by agency administrators and employees; and
 - 6) ensuring employees are aware of, and trained on, data policies, directives, and guidelines.
- B. Deputy Bureau Directors (DBD), Office of Trust Services (OTS), Office of Justice Services (OJS), Office of Indian Services (OIS), and Field Operations** are responsible for:
- 1) providing executive leadership, oversight, direction, and monitoring of data governance within their services, functions, and/or offices to include periodic program reviews;
 - 2) providing policy and technical assistance supporting the Program;
 - 3) assigning Data Stewards (i.e., a senior manager within their services/functions/offices/regions) to support the Program; and
 - 4) assigning Data Asset Custodians within their services/offices/functions/regions to support the Program.
- C. ACDO, BIA** is required to implement all directives, policies, and guidelines for data assets collected, created, or acquired in accordance with statute, regulation, and Departmental policy. The ACDO is responsible for:
- 1) providing guidance and direction for the Program, including developing operational policies;
 - 2) providing advice, support, and implementation guidance on Departmental directives, policies, and guidelines supporting open data requirements;

INDIAN AFFAIRS MANUAL

- 3) monitoring data internal controls to measure effectiveness;
- 4) establishing and maintaining inventories for BIA data assets with support of DBDs, designated Data Stewards, Data Asset Custodians, Data Asset Producers, Systems Owners, and any other appropriate BIA personnel to ensure protection for confidentiality, integrity, and availability of data; and
- 5) providing advice and support to Data Stewards, Data Asset Custodians, Data Asset Producers, and System Owners to ensure data assets meet requirements for openness, accuracy, and completeness.

D. Data Steward is accountable for ensuring their data assets comply with Departmental directives, policies, and guidelines. A Data Steward is responsible for:

- 1) managing BIA assets within their area of responsibility;
- 2) providing guidance and support to Data Asset Custodians, Data Asset Producers, and System Owners to ensure data assets meet requirements for openness, accuracy, and completeness;
- 3) ensuring that the Data Asset Custodian in their service, office, and/or region's area of responsibility documents and maintains data assets;
- 4) ensuring the implementation of all Departmental directives, policies, and guidelines for data category compliance, metadata management, and quality control of data assets; and
- 5) completing all training that provides foundations of data governance and management (see section 1.8 of this policy for training requirements).

E. Data Asset Custodian is the technical point of contact for data assets. A Data Asset Custodian is responsible for:

- 1) managing the BIA data assets within their area of technical management for storage, integrity, and security of data;
- 2) ensuring public data assets are available and in a machine-readable format which complies with Departmental standards;
- 3) supporting the area Data Steward and Data Asset Producer in implementing the management of data assets;
- 4) supporting Data Asset Producers to ensure they meet all Departmental directives, policies, and guidelines supporting data assets; and
- 5) completing all training that provides foundations of data governance and management (see section 1.8 of this policy for training requirements).

- F. Data Asset Producer** directly creates, collects, acquires, and distributes data. A Data Asset Producer is responsible for:
- 1) creating, collecting, or acquiring data in digital form;
 - 2) creating and managing metadata in accordance with Departmental directives, policies, and guidelines; and
 - 3) ensuring quality control efforts are implemented for the management of BIA data.
- G. System Owner** procures, develops, integrates, modifies, operates, maintains, and disposes of an information system. A System Owner is responsible for:
- 1) documenting all data assets within the system and ensuring the ACDO, Data Steward, and Data Asset Custodian are aware of all data assets; and
 - 2) maintaining data schemas and data dictionaries for their information systems.

1.6 Definitions.

- A. Accessible** means the ability to readily obtain data when needed.
- B. Artificial Intelligence (AI)** is a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments. AI systems use machine- and human-based inputs to perceive real and virtual environments; abstract such perceptions into models through analysis in an automated manner; and use model inference to formulate options for information or action.
- C. Controlled Unclassified Information** means information that requires safeguarding or dissemination controls pursuant to and consistent with law, regulations, and government-wide policies, excluding information classified under Executive Order 13526 of December 29, 2009, or the Atomic Energy Act, as amended.
- D. Data** is recorded information, regardless of form or the media on which the data is recorded.
- E. Data asset** is a collection of data elements or data sets that may be grouped together.
- F. Data Sharing Agreement (DSA)** is any memorandum of understanding, memorandum of agreement, letter of intent, information sharing access agreement, or agreement that is used to facilitate a one-time or enduring exchange of, or access to, data for operational or reporting purposes. A DSA may cover limited periods of time (e.g., as a part of a pilot initiative) between the Department (or any element or entity within the

INDIAN AFFAIRS MANUAL

Department) and or one or more outside parties (including domestic or foreign entities in the private or public sector and government agencies, including those within the Department, at the federal, state, local, Tribal, or territorial level). DSAs may include appendices and supporting addenda. These appendices and addenda, combined with the governing DSA, constitute the entire agreement.

- G. Geospatial data** is Information that is tied to a location on the Earth. See the Geospatial Data Act of 2018 for the complete definition.
- H. Information system** is discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information.
- I. Interconnection Security Agreement (ISA)** is a document specifying information security requirements for system interconnections, including the security requirements expected for the impact level of the information being exchanged for all participating systems.
- J. Machine readable** is data formatted so it can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost.
- K. Metadata** is structural or descriptive information about data such as content, format, source, rights, accuracy, provenance, frequency, periodicity, granularity, publisher, or responsible party, contact information, method of collection, and other descriptions.
- L. Open format** is a non-proprietary file format that has a fully documented, published specification that is maintained by a standards body or a community driven process and has no restrictions placed upon its use.
- M. Open government data asset** is a public data asset that is machine-readable; available (or could be made available) in an open format; not encumbered by restrictions, other than intellectual property rights, including under titles 44 U.S.C. 17 and 44 U.S.C. 35, that would impede the use or reuse of such asset; and based on an underlying open standard that is maintained by a standards organization (see also: 44 U.S.C. § 3502[20]).
- N. Open license** is a legal guarantee that a data asset is made available at no cost to the public; and with no restrictions on copying, publishing, distributing, transmitting, citing, or adapting such asset.

INDIAN AFFAIRS MANUAL

- O. Open standard** is a technical standard developed or adopted by voluntary consensus standard bodies, both domestic and international, that includes provisions requiring that owners of relevant intellectual property have agreed to make that intellectual property available on a non-discriminatory, royalty-free, or reasonable royalty basis to all interested parties.
- P. Personally Identifiable Information (PII)** is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.
- Q. Public data asset** is a data asset, or part thereof, maintained by the Federal Government, which has been, or may be, released to the public, including any data asset, or part thereof, subject to disclosure under the Freedom of Information Act.

1.7 Standards and Requirements. This section identifies standards and other requirements that have general and continuing applicability to data governance.

- 1) Employees may not disclose non-public data (including through any input prompt) to any Generative AI (GenAI) system unless or until that GenAI system is authorized by the Department for use.
- 2) All existing Departmental policies apply when using or procuring AI technologies in the Department.
- 3) BIA must implement internal controls which ensure metadata records are created and managed in accordance with Department Data Governance Board directives and Federal regulations.
- 4) BIA personnel will comply with the Department's policy for Open Data and Enterprise Data Inventory Requirements, including ensuring all data assets collected, created, or acquired following the enactment of the OPEN Government Data Act are made open government data assets by default, unless doing so is restricted by law or regulation.

1.8 Training Requirements. The following minimum requirements or authorized equivalents must be met prior to serving as a Data Steward or Data Asset Custodian. These courses are available online in DOI Talent and in Defense Acquisition University (DAU).

- Data Literacy for Business Professionals
- Data Protection and Device Security
- Modern Data Management: Data Governance
- Modern Data Management: Data Management Systems
- Modern Data Management: Data Quality Management

INDIAN AFFAIRS MANUAL

Part 78
Chapter 2

BIA – Other Programs
Data Governance

Page 8

- Federal Acquisition Course (FAC) 100: Artificial Intelligence (AI) Overview
- Introduction to Artificial Intelligence
- Artificial Intelligence: How Project Managers Can Leverage AI

Additionally, as Data Stewards and/or Data Asset Custodians complete the above designated courses, they should notify the BIA ACDO for inclusion in the BIA Data Trained Workforce Database.

Approval

Darryl LaCounte

Digitally signed by Darryl
LaCounte
Date: 2024.05.13 14:32:18 -04'00'

05/13/24

Darryl LaCounte
Director, Bureau of Indian Affairs

Date