1.1 Purpose. This chapter establishes the policy and responsibilities for the Indian Affairs' (IA) Directives System. The Directives System is comprised of the policies and procedures documenting the functions under the authority of the Assistant Secretary - Indian Affairs (AS-IA).

The Directives System provides a formal structure for developing, publishing, and applying clear, concise, and consistent IA program and administrative policy. It also facilitates IA's compliance with the law to have accurate and accessible documentation for employees and the public; provides appropriate controls and documentation of IA program and administrative functions; provides instructions/guidance to enable employees to perform their duties and responsibilities; and facilitates overall accountability across IA.

Senior IA leadership issued a memorandum in February 2016 (Attachment 1) reiterating the importance of developing IA policy, and that all IA programs and offices must work through the IA Office of Regulatory Affairs and Collaborative Action (RACA) to do so. RACA provides detailed information and templates on its intranet website to assist those who develop/update policies and procedures for IA programs and activities: https://inside.bia.gov/asia/raca/direct-sys. Additionally, Part 1, chapter 1 of the Indian Affairs Manual (IAM) (i.e., 1 IAM 1), Indian Affairs Directives System – General, provides further details regarding the six types of directives that comprise the Directives System.

1.2 Scope. Compliance with federal and Department of the Interior (DOI) requirements for Directives Management applies to all programs under the authority of the AS-IA, including the offices under the AS-IA, the Bureau of Indian Affairs (BIA), and the Bureau of Indian Education (BIE).

1.3 Policy. It is the policy of IA to develop and maintain a strong operational and internal control foundation through effective regulations, policies, procedures, handbooks, memoranda, manuals, and other means that facilitate compliance with all applicable federal laws and regulations and Departmental policies and procedures regarding Directives Management.

1.4 Authority.

A. Statutes and Regulations.

    1) 5 U.S.C. § 552 et seq., Administrative Procedure

    2) 29 U.S.C. § 794 (d), Section 508 of the Rehabilitation Act of 1973, as amended

    3) 44 U.S.C. §§ 3101-3102, Records Management by Federal Agencies

B. Guidance.

1) 381 Departmental Manual (DM) 1, Directives Management

2) 381 DM 3, Directives of Other Agencies

3) 381 DM 4, Departmental Directives System

4) 1 IAM 1, Indian Affairs Directives System – General

5) Memorandum, Indian Affairs Policy and Directives, February 17, 2016 (Attachment 1)

6) Memorandum, Indian Affairs Policy Database, November 24, 2014 (Attachment 2)

C. Handbooks.

1) 1 IAM 1-H, IA Directives Handbook

1.5 Responsibilities.

A. **AS-IA** is responsible for ensuring that IA establishes appropriate organizational arrangements and procedures, with adequate staffing and resources, to comply with federal and Departmental regulations, requirements, policies, and procedures.

B. **Deputy Assistant Secretaries; and Directors, BIA and BIE** are responsible for:

1) ensuring IA processes and resources are in place to facilitate cooperation and responsiveness to policy and procedure development, including timely review and signature of directives as appropriate;

2) ensuring policy and procedures for functions within their authority are accurate and up-to-date, and that program staff/management work with RACA to develop and/or update policy as appropriate; and

3) communicating with and managing Regional Director participation in policy development as needed, including ensuring policy is carried out as documented.

C. **Director, RACA** is responsible for the overall management of the IA Directives System. RACA provides all guidance, technical assistance, review and editing, tracking, and communications regarding the development and publication of all components of the IA Directives System, including publication of Directives online.

D. RACA Directives Staff are responsible for serving as the points of contact for IA programs/offices regarding policy development. Specifically, Directives staff:

1) track all directives development from initial inception to completion, including assigning and maintaining release numbers and document identification numbers;

2) review all drafts for format, proper delegation of authority, comprehension, and plain language, and provide edits and suggestions where needed;

3) coordinate recommended changes/corrections with the originating office, and determine when a directive is considered "final" and ready for surnaming and final signature;

4) manage the IA Policy Database in DTS (Attachment 2); this includes entering all documents into the database, routing them, and tracking them through the final review, surnaming, and signature process, as well as any additional edits that may arise throughout this process; and

5) maintain the official policy records for IA, including all hard copy, original signature directives and soft copies for records management purposes.

Once the document is surnamed and signed by the appropriate officials, the soft copy is returned to RACA through DTS and the signed original is mailed by the program/office to RACA. The directive is considered current and final only after it has been *signed* by the appropriate signatory authority. RACA then performs final document processing, publishes the directive to the internet, and communicates with IA offices accordingly regarding the directive's publication.

In accordance with the Administrative Procedure Act, RACA ensures all IA operating policy is available to the public and maintains a website of all IA Directives, including historical documentation whenever available.

E. IA Offices (including offices under the AS-IA, BIA, and BIE, and those located at Central Office and in the regions) are responsible for working with RACA to maintain their current policies and related procedures, revise existing policies and procedures, and to remove outdated information under the components of the Directives System within their area of authority.

Specifically, the originating or authoring office is responsible for developing or updating the chapter, memoranda, or handbook content; circulating drafts for internal review and comment; making revisions in response to comments; working with RACA to address all edits; determining who should be included in the surnaming process in consultation with RACA (RACA enters it into DTS); and ensuring the material is appropriately distributed after publication.

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Chapter 5	Directives System	Page 4

The originating office is viewed as the "subject matter expert" regarding what and how functions are performed; where and how information and decisions are secured; what requirements must be met to get benefits or service; and/or what procedures must be followed. Therefore, the originating office's responsibility for content improves the ability to document the functions of IA programs and meet the regulatory requirements of the Public Information section of the Administrative Procedure Act.

Before drafting a policy chapter, national or regional memorandum, or handbook, the originating office should consider carefully who should be involved in the directive's development, and who should surname the document. If another office, program, directorate, or functional area (i.e., the Solicitor's Office, Office of the Special Trustee (OST), Office of Hearings and Appeals (OHA)) is assigned taskings or responsibilities within the document, the referenced group may need to review what is being proposed.

1.6 Directives Overview.

Detailed guidance on directives development is found in 1 IAM 1-H, IA Directives Handbook. However, some key tips are as follows:

- Directives are intended to convey basic requirements and should generally be limited to a few pages. If a directive becomes longer, consideration should be given to reconstructing the material into additional components (for example, into an IAM chapter *and* a handbook, or into multiple IAM chapters). Handbooks provide a greater level of detail (i.e., procedural) regarding how IA programs and staff carry out their responsibilities.

- Directives should be written in plain language, which is simple and easily understood. Federal agencies are required to write documents using 'plain language' as documented in the Plain Writing Act of 2010. Guidance on plain language writing can be found here: http://www.plainlanguage.gov/index.cfm. Additionally, technical language and legal jargon should be avoided at the policy level.

- Directives have standard formats that are generally unique to an organization. IA's directives templates are discussed in 1 IAM 1–H, IA Directives Handbook, and templates are located on RACA's intranet website: https://inside.bia.gov/asia/raca/direct-svs.
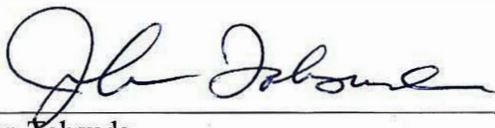
- Directives are not created for every contingency and are not necessarily intended to be all-encompassing, addressing every possible scenario or issue that could arise in the course of normal operations. In order to be effective, directives must be as accurate and as current as possible, but also *available*.

Approval

AUG 1 6 2019

John Tahsuda   Date
Principal Deputy Assistant Secretary–Indian Affairs

Attachment 1

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

FEB 17 2016

Memorandum

To: Deputy Assistant Secretaries
           Director, Bureau of Indian Affairs
           Director, Bureau of Indian Education
           All Regional and Office Directors

From: Lawrence S. Roberts
           Acting Assistant Secretary – Indian Affairs

Subject: Indian Affairs Policy and Directives

As you fulfill the daily, programmatic functions that are so important to meeting Indian Country's needs, please set aside some time to ensure that your office's operational policy (including functions, delegations, and responsibilities) is accurately documented in the Indian Affairs Manual (IAM). Documentation of your operational policy is vitally important, not just because it is required by law[1], but because it provides a framework to guide program decisions, promotes consistency in staff performance of functions, and furthers accountability to facilitate desired results. The Departmental Manual requires all bureau offices and programs to review their policies and directives for need and accuracy on a biennial basis.[2]

The IAM is the primary source of Indian Affairs (IA) operational policy.[3] The IAM replaced the Bureau of Indian Affairs Manual (BIAM) in 1997,[4] and changes in technology, organization, the law, and processes have superseded BIAM content. Your office's IAM chapters should reflect these changes.

Upon receipt of this memorandum, please ensure that you and your staff are no longer relying on BIAMs. Please also undertake a review of your IAM chapters to ensure they are as complete, current, and accurate as possible, and coordinate all IAM chapter drafts and updates through the IA Office of Regulatory Affairs & Collaborative Action (RACA). The RACA provides overall management of the IA Directives System, including all IAM chapters and other policy documents. The RACA staff are on standby to assist you in the process of updating your IAM chapters, as well as any other policy needs (e.g., policy memoranda, handbooks). Please contact Ms. Shannon Simpson, RACA Policy Specialist (703) 390-6328 or Ms. Amanda Begay, RACA Policy Specialist (703) 390-6758, for assistance.

Thank you in your continued efforts to keep the IAM as up-to-date as possible.

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[1] The Federal Records Act (44 U.S.C. 3101) and the Administrative Procedures Act (5 U.S.C. 552) mandate that Federal agencies develop, and make available to the public, proper documentation of their organization and functions.
[2] 381 DM 1.
[3] For more detail on the IA Directives System and all six components, please see:
http://www.bia.gov/WhatWeDo/Knowledge/Directives/index.htm.
[4] From 1997 to 2003, multiple release memoranda and conversion tables were created to document the conversion of BIAM parts and chapters to IAM parts and chapters. The Index of IAM chapters and historical BIAM chapters can be found here: http://www.bia.gov/WhatWeDo/Knowledge/Directives/BIAM/index.htm.

Attachment 2

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

NOV 24 2014

Memorandum

To: All Central Office Directors
        All Correspondence Contacts
        All DTS Users

From: Thomas Thompson
        Deputy Assistant Secretary – Indian Affairs (Management)

Subject: Indian Affairs Policy Database

This memorandum is to inform all users of the new Indian Affairs (IA) Policy Database created in the Data Tracking System (DTS) to track all IA operational policy and directives. The IA operational policy and directives include documents such as the Departmental Manual (DM) chapters, Indian Affairs Manual (IAM) chapters, handbooks, and national and regional policy memoranda.

The IA Office of Regulatory Affairs and Collaborative Action (RACA) is responsible for managing the IA Policy Database. The RACA will continue to work with management and program staff to determine the correct surnaming participants before routing for action, and will ensure the necessary surnames and final signature are obtained.

With the implementation of the IA Policy Database, the following procedures will apply:

- All IA surname-ready policy and directives will be created and routed in DTS by RACA;
- All documents will be routed for electronic surnaming and will not be surnamed in any other manner (i.e., no hard copy routing);
- Transmittal and Clearance Sheets will no longer be used;
- The authorized official will sign the signature page (i.e., last page of the policy or directive); and
- When a document is signed, the program office will upload the scanned original into DTS and return the signed hard copy to RACA for their official record.

The RACA provides information and templates on its intranet website to assist those who develop/update policies and procedures for IA programs and activities. They may be found at: http://inside.bia.gov/Org/AS-IA/ORM/DirectSvs/index.htm. In addition, the IA Directives Handbook (1 IAM-H), provides detailed guidance on IA policy development, and may also be found at: http://www.bia.gov/WhatWeDo/Knowledge/Directives/Handbooks/index.htm.

If you have any questions regarding the IA Policy Database procedures, you may contact Ms. Shannon Simpson by telephone at (703) 390-6328 or by email at Shannon.Simpson@bia.gov. The DTS Administrator, Stephanie Cloud, will remain the contact person for any DTS issues, questions, or concerns. Ms. Cloud may be reached at (202) 513-0827 or by email at Stephanie.Cloud@bia.gov.

cc: Director, RACA
        ESIA Staff

#19-34, Issued: 8/16/19
Replaces #17-11, Issued: 8/14/17