

BY THE COMPTROLLER GENERAL

Report To The Congress

OF THE UNITED STATES

Better Management Of Information Resources At The Bureau Of Indian Affairs Could Reduce Waste And Improve Productivity

The Department of the Interior's Bureau of Indian Affairs has not effectively managed its automatic data processing equipment (ADP), systems development projects, and forms. GAO found equipment being underused or not being used at all, systems development efforts that duplicated or overlapped one another, and unapproved forms being used to collect information.

In an effort to impose tighter controls, the Congress cut the Bureau's ADP funds for fiscal year 1984 by \$8.4 million--from \$11.4 million to \$3 million--and directed the Bureau to take several corrective actions. Interior has initiated actions to strengthen the Bureau's management of information resources, but additional actions are needed to resolve identified problems. For example, Interior created an office to deal with the Bureau's ADP problems, but this office has not been staffed and its charter does not cover significant aspects of information resources management, such as overseeing the use of funds to develop software for Bureau computers.

Interior believes GAO's recommendations will be useful in improving the management of information resources in the Bureau.



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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D.C. 20548

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To the President of the Senate and the
Speaker of the House of Representatives

This report describes weaknesses in the Bureau of Indian Affairs' management of such information resources as automatic data processing equipment, information systems, and forms. The report shows that information resources are not effectively managed within the Bureau. As a result, the Bureau has incurred unnecessary costs and has missed opportunities for improving program management, productivity, and service delivery. If the Bureau is to effectively manage its information resources, then it must establish an organization, structure, and discipline for managing those resources. The report suggests ways in which the Secretary of the Interior can assist the Bureau.

We made this review to ascertain whether the Bureau could increase productivity and reduce costs by improving its procedures for acquiring, using, and managing various information resources.

We are sending copies of this report to the Director, Office of Management and Budget; the Secretary of the Interior; and interested congressional committees and subcommittees.

A handwritten signature in black ink that reads "Charles A. Bowles".

Comptroller General
of the United States



COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

BETTER MANAGEMENT OF
INFORMATION RESOURCES AT
THE BUREAU OF INDIAN AFFAIRS
COULD REDUCE WASTE AND IMPROVE
PRODUCTIVITY

D I G E S T

The Department of the Interior's Bureau of Indian Affairs depends heavily on such information resources as automatic data processing (ADP) equipment, automated information systems, and forms to collect, process, store, and distribute information on the Indian people. Because of the value and expense of information resources--the Bureau estimates that it spends \$55 million annually on information collection and processing activities alone--it is essential that the agency properly manage and control these resources.

GAO performed this review to ascertain (1) the extent to which the Bureau was using modern technologies to help employees reduce costs and improve productivity and (2) how effectively the Bureau managed its ADP equipment, information systems, and forms.

INFORMATION RESOURCES
CAN BE BETTER MANAGED

GAO found that, although the Office of Management and Budget's and the Bureau's internal directives require that ADP equipment be inventoried periodically and that equipment not be installed until needed, the Bureau had no effective means for carrying out these requirements.

From its evaluation of management practices at the Bureau's headquarters and its visits to 17 of the Bureau's 309 local offices, GAO found that the Bureau did not always know what ADP equipment it had, where it was located, and how it was being used because it did not keep an accurate inventory of its equipment, as required. GAO selected these 17 offices because they had 64 percent of the ADP equipment listed on the Bureau's inventory records.

In addition, GAO found that the Bureau's coordination of information systems and oversight of information collection activities were not effectively managed.

ADP equipment not used

ADP equipment--ranging from small-scale computers to word processors and computer terminals--was not being used. According to Bureau officials, many of the items had continually sat idle since being acquired because local offices (1) had no space or use for the equipment or (2) did not have the software, communications lines, or staff to operate the equipment. Allowing equipment to go unused was costly. For example, 326 of the 1,325 items of ADP equipment identified by GAO were unused items and were being leased at an annual cost of \$687,000. (See p. 6.)

If the Bureau had used equipment it already had available, it could have improved its management of oil royalty data and reduced the administrative cost for overseeing individual Indian money accounts. GAO estimates that 3 of the 17 field offices it visited could, together, save \$300,000 a year by using existing ADP equipment to automate 24,300 money accounts. (See p. 10.)

Coordination of systems lacking

The Paperwork Reduction Act (Public Law 96-511) requires that agencies ensure that systems do not overlap or duplicate one another. Because the Bureau does not have a centralized means of coordinating systems development efforts, 99 Bureau managers independently develop, implement, and maintain information systems. Such fragmented management has resulted in the development and maintenance of at least nine duplicative or overlapping information systems. For example, the Bureau's Integrated Records Management System and Indian Services Information System directly duplicate each other. Both systems contain basically the same information on Indian people and land. (See pp. 13 to 15.)

Information collection oversight not adequate

The Bureau is responsible for seeing that local offices' information collection activities comply with the requirements of the Paperwork Reduction Act. The act states that agencies cannot collect information from the public until the Director of the Office of Management and Budget approves the necessary forms. Because the Bureau did not follow established oversight procedures and local offices

did not comply with forms approval directives, unapproved forms were used to collect information. For example, at the 17 offices visited, GAO found 128 unapproved forms being used to collect education and social services data.

The Bureau's dependence on unapproved forms could pose problems in its management of various programs. For example, the Bureau cannot use a person's failure to complete an unapproved form used for the receipt of a benefit (such as admission to a post secondary education program) as grounds for withholding the benefit. (See p. 18.)

ADDITIONAL ACTIONS NEEDED TO IMPROVE THE MANAGEMENT OF INFORMATION RESOURCES

Out of concern over the manner in which the Bureau managed its information resources, the Congress cut the Bureau's fiscal year 1984 ADP funds by \$8.4 million--from \$11.4 million to \$3 million--and directed the Bureau to take several corrective actions. In responding to the Congress, Interior, in October 1983, established an Office of Data Systems in the Bureau, to be responsible for improving the Bureau's management of ADP resources. It also established an ADP improvement task force to carry out the responsibilities assigned to the office until the Bureau could organize and staff the office. (See pp. 9 and 25.)

Office's charter needs expanding

In May 1984, the Bureau issued a delegation of authority giving responsibility to the office's director for managing the Bureau's ADP equipment, developing automated information systems, and reviewing and recommending approval of any information collection instruments that might affect automated processing.

The Bureau's delegation, however, did not make the office's director responsible for managing all the Bureau's information resources. According to the office's acting director, the Bureau has not given this office the responsibility for (1) overseeing funds used in developing and maintaining information system software or (2) reviewing and approving information collection instruments that do not affect automated processing. GAO believes the Bureau will continue to experience problems in managing its information resources by not including these types of responsibilities in the delegation.

GAO also found that the Bureau has not established an organizational structure for the Office of Data Systems or begun recruiting and hiring individuals to staff the office. (See p. 34.)

Task force needs to improve controls over resources

As of September 1984, Interior's ADP improvement task force had completed an organizational study and recommended an organizational structure for the Bureau's Office of Data Systems. Also, it had completed a physical inventory of ADP equipment.

However, the task force has not been able to carry out its assigned responsibilities for establishing better control over the Bureau's ADP operations. For example, the task force has not completed a redesign of the Bureau's property inventory system so that the Bureau will be able to (1) effectively control its ADP equipment, (2) inventory information systems to identify duplicate and overlapping systems, and (3) inventory forms to identify the ones that are needed but have not yet been approved by the Office of Management and Budget.

Task force efforts have been limited because 4 of the task force's 12 members have left the task force since its inception in October 1983. The eight remaining members are performing the bulk of the work for the Bureau's multimillion-dollar ADP program. (See pp. 34 to 38.)

Organizational structure and qualified staff needed

The task force deemed it critical that an organizational structure be approved, that highly qualified people be hired to staff the Office of Data Systems, and that a transition period from the task force to the permanent organization be provided to maintain continuity. Because Bureau progress in these areas has been slower than expected, Interior has had to extend the task force for 6 months, from October 1984 to March 1985.

GAO believes that these delays will continue to hamper the Bureau's ability to establish unified direction and control over its ADP equipment resources, information systems, and forms. (See pp. 34 to 35.)

INTERIOR NEEDS TO CONTINUE
PROVIDING LEADERSHIP TO
THE BUREAU

Interior's Office of Information Resources Management needs to provide leadership to the Bureau to ensure that the Bureau's management of information resources continues to improve. Under Interior's departmental orders, this office is responsible for establishing and maintaining a comprehensive information resources management program. It also is to monitor activities in the bureaus to assess their progress in achieving Interior's information resources management goals, and to provide guidance to bureaus and offices on policy implementation. Although the office knew about the Bureau's problems and had identified areas for improvement, it did not follow through to see that the Bureau took corrective actions. The office believed it was to operate in an advisory capacity and therefore only provided advice and technical assistance to the Bureau. GAO found, however, that under departmental orders and the Paperwork Reduction Act, the office does have the authority to direct the Bureau's actions and that it has not fulfilled its responsibilities to

- systematically inventory the Bureau's major information systems;
- periodically review information management activities related to planning, budgeting, organizing, directing, training, promoting, and controlling activities involving the collection, use, and dissemination of information; and
- ensure that existing information systems do not overlap or duplicate one another.

In GAO's opinion, the office needs to provide stronger leadership and assistance in designing and establishing an effective information resources management program in the Bureau. (See p. 21.)

GAO also believes that Interior needs to continue closely monitoring the Bureau to ensure that needed corrective actions are carried out. Until the Bureau addresses the issues of accountability and hiring, GAO believes Bureau efforts to correct longstanding information resources management problems will continue to falter. (See pp. 32 to 38.)

RECOMMENDATIONS TO THE
SECRETARY OF THE INTERIOR

To improve the overall management of information resources at the Bureau of Indian Affairs, GAO recommends that the Secretary do the following:

- Direct the Assistant Secretary for Indian Affairs to either expand the responsibilities of the director of the Office of Data Systems or appoint a senior official to serve as an information resources manager. This person would be responsible and accountable for overall management of the Bureau's information resources. (See p. 30.)
- Direct the Assistant Secretary for Indian Affairs to establish better controls over ADP equipment, systems development efforts, and paperwork management activities by periodically inventorying (1) ADP equipment, to determine the extent to which the equipment continues to go unused; (2) Bureau information systems, to identify duplicate and overlapping systems; and (3) the forms used to collect information from the public, to identify any forms that are needed in the operation of Bureau programs but have not yet been approved by the Office of Management and Budget. (See pp. 30 to 32.)
- Direct the Assistant Secretary for Policy, Budget and Administration--the Interior official responsible for implementing and maintaining an effective information resources management program departmentwide--to do the following:
 - (1) Review, on a cyclical basis, the Bureau's information resources management activities to prevent a recurrence of the types of management problems described in this report.
 - (2) Prohibit the Bureau from acquiring any additional ADP equipment and related software without the Assistant Secretary's approval, until it demonstrates that it has established effective management controls over these resources.
 - (3) Work with the Bureau to ensure that it develops and implements effective controls for managing its information resources. (See p. 32.)

These and related recommendations are discussed in detail on pages 30 to 32.

AGENCY COMMENTS AND GAO'S EVALUATION

Interior said GAO's recommendations will be useful in improving the management of information resources in the Bureau and other organizations of the Department. Interior believes, however, GAO's recommendation that the Bureau be prohibited from acquiring additional ADP equipment and related software until it demonstrates that it has established effective management controls over these resources should be revised to apply only to major acquisitions. Because of the Bureau's difficulties in setting up its Office of Data Systems, GAO believes Interior should maintain control over all Bureau ADP acquisitions until the Office of Data Systems is staffed and fully functioning. GAO agrees that ADP acquisitions may be authorized with departmental review and approval and has clarified its recommendation accordingly. (See p. 36.).

Interior also said that the Department and the Bureau have already taken several steps to correct longstanding information resources management problems at the Bureau. GAO agrees and has described these efforts in its report. However, GAO believes that if these actions are to be successful, then the Bureau must first establish an organizational structure for its Office of Data Systems and hire qualified people to staff the office.



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ABBREVIATIONS

AADIX	Area and Agency Distributed Interchange Executive
ADP	automatic data processing
GAO	General Accounting Office
IIM	individual Indian money
IRM	information resources management
OMB	Office of Management and Budget

CHAPTER 1

INTRODUCTION

The Bureau of Indian Affairs is the United States' principal agent in the government-to-government relationship between the United States and federally recognized Indian tribes. The Bureau carries out the responsibilities of the federal government as trustee for property held for federally recognized tribes and for individual Indians.

Under the broad scope of its mission, the Bureau is required to collect, process, store, and disseminate information on many aspects of Indian affairs, including education, economic development, natural resources, and trust activities. The Bureau estimates that it spends \$55 million a year collecting and processing over 3 million documents and records. The documents are used to distribute over \$900 million in federal funds among various programs, such as education and social services. The information is collected, processed, stored, and distributed at the Bureau's 12 area offices, 83 agency offices, 213 Indian schools (which are either funded or operated by the Bureau), administrative services center, and headquarters.

With the enactment of the Paperwork Reduction Act of 1980 (Public Law 96-511), the government is promoting the concept of information resources management (IRM) as a way to integrate a variety of information-related activities to improve the management of information. Under the act, federal departments and agencies are required to address the issue of how to structure the collection, processing, and maintenance of information to serve agency needs effectively. Effective practices are those that make management and program information available to those who need it in a timely, cost-effective manner.

Within the Department of the Interior, the Office of Information Resources Management has one primary objective: to establish and maintain a comprehensive IRM program. The IRM office is responsible for developing plans and policies; directing and reviewing the IRM program, once implemented; monitoring activities agencywide to assess progress in achieving Interior's IRM goals; and providing guidance to bureaus and offices on policy implementation. The office is also responsible for providing services to bureaus in nine areas, including automated storage and retrieval systems, word processing, and paperwork management.

The Paperwork Reduction Act requires agencies to designate an official who will be responsible and accountable for implementing and maintaining an effective IRM program agencywide. At Interior, this official is the Assistant Secretary for Policy, Budget and Administration. The Assistant Secretary has delegated to the director of Interior's IRM office the authority for carrying out Interior's responsibilities under the Paperwork Reduction Act. The

Assistant Secretary for Indian Affairs is responsible for helping implement Interior's IRM program and for establishing an IRM program in the Bureau.

In the past, our office has issued several reports on the Bureau of Indian Affairs' information management practices. These reports, which are listed in appendix I, cover such areas as reliability and accuracy of Bureau program information, acquisition of automatic data processing (ADP) technology (equipment and software), and financial accounting systems. This report focuses on the Bureau's management of ADP equipment, systems development efforts, and forms. It (1) offers observations on the problems and complexities of managing these resources, (2) identifies areas where the Bureau could decrease the paperwork burden and improve service, and (3) identifies issues that Interior's designated IRM official should consider in overseeing the Bureau's management of information resources.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to ascertain (1) the extent to which the Bureau was using modern technologies to help employees reduce costs and improve productivity and (2) how effectively the Bureau manages its ADP equipment, information systems, and paperwork.

We carried out our field work from July 1982 through April 1983 at the following 17 of 309 local offices:¹

- The administrative services center in Albuquerque, New Mexico.
- The Albuquerque, New Mexico; Anadarko, Oklahoma; Billings, Montana; Muskogee, Oklahoma; Phoenix, Arizona; and Portland, Oregon; area offices.
- The Anadarko, Pawnee, Osage, and Tahlequah agency offices in Oklahoma; the Crow and Northern Cheyenne agency offices in Montana; and the Southern Pueblos and Northern Pueblos agency offices in New Mexico.
- The Santa Fe School and the Institute of American Indian Arts in New Mexico.

We selected these 17 offices because they had 843 (or 64 percent) of 1,321 pieces of ADP equipment listed on the Bureau's October 1, 1982, inventory records.

¹When the term "local office" is used, it is meant to include all types of Bureau field offices, including the administrative services center, area offices, agency offices, and Indian schools funded and operated by the Bureau.

During our review, we talked with Bureau personnel at headquarters and local offices involved in providing technical assistance and in acquiring and promoting the use of ADP equipment. We also examined the Bureau's long-range plan for acquiring and using ADP equipment. In addition, we inventoried ADP equipment available at the local offices visited and discussed with Bureau headquarters and Interior officials, the benefits and problems of planning for and using ADP equipment.

We talked with personnel in the Bureau's education and social services programs to find out whether ADP equipment could be used more effectively in their program activities. Interviews were based on a standard interview guide, thus ensuring the comparability of the information supplied. Those interviewed were asked

- how offices collected data;
- what type of ADP equipment was used in processing and maintaining data; and
- how available ADP equipment could be used to improve the collection, processing, and storage of data and information.

Our review did not encompass all Bureau programs. In addition, we did not assess whether programs were achieving their goals or whether the programs were needed. Because we did not randomly select the locations visited, we cannot project the results of our work to all local offices. Significant events occurring since April 1983 are noted as appropriate.

We coordinated our work with Interior's Office of Inspector General. While there, we reviewed inspector general reports on the Bureau, covering such areas as integrated records management and acquisition of ADP services. We also coordinated our work with Interior's Office of Information Resources Management, including a review of that office's pertinent records. In addition, we briefed congressional committees on the Bureau's management of information resources.

We performed this review in accordance with generally accepted government auditing standards.

CHAPTER 2

MANAGEMENT APPROACH PREVENTS

THE BUREAU FROM REALIZING

FULL BENEFITS OF ADP EQUIPMENT

Although OMB regulations and the Bureau's internal directives require that ADP equipment be inventoried periodically and that equipment not be installed until the organization is ready to use it, the Assistant Secretary for Indian Affairs has no effective means for carrying out these requirements. As a result, the Bureau does not always know what ADP equipment it has on hand or how it is being used, and hundreds of pieces of equipment are going unused. Those responsible for overseeing the acquisition, installation, and use of ADP equipment have not exercised adequate management controls. Additionally, the Bureau has overlooked opportunities for using ADP equipment, especially computers, to improve productivity and service.

BUREAU INVENTORY WAS INACCURATE

The Bureau does not always have accurate information on the type, amount, location, and cost of its ADP equipment. Regulations require federal agencies and departments to maintain an accurate inventory of their ADP equipment and to physically inspect the equipment at regular intervals. However, neither local offices nor Bureau employees were following these regulations. As a result, Bureauwide inventory data were understated by at least 591 items, and 109 items costing \$784,000 to purchase and to lease annually could not be found at the locations listed on inventory records.

At the time of our review, two regulations provided procedures for maintaining an accurate inventory of ADP equipment. Office of Management and Budget (OMB) Circular A-11² required government agencies obligating more than \$100,000 for ADP equipment to report annually all ADP hardware held by the agency and all hardware costs incurred. Title 2 of GAO's Policy and Procedures Manual for Guidance of Federal Agencies required that physical inventories of fixed assets be taken at regular intervals as a check on accounting procedures. Title 2 also required that differences between quantities determined by physical inspections and those shown on accounting records be investigated to determine their causes and to identify necessary improvements in procedures. Accounting records were to be brought into agreement with the results of physical inventories.

²OMB's requirement has been incorporated into the Bureau of Indian Affairs Manual (pt. 35, sec. 2.3).

To find out if the Bureau was maintaining an accurate inventory and physically inspecting equipment, as required, we visited the administrative services center, six area offices, eight agency offices, and two Indian schools between October 1 and December 31, 1982. At these sites, we physically inventoried the ADP equipment, using a listing prepared by the Bureau's administrative services center from information provided by local offices.

Although the center's inventory list showed that the 17 offices had 843 pieces of ADP equipment, we located 1,325 items, 591 of which were not on the list. Of these 591, 414 were being leased at \$663,000 a year, 171 were purchased for \$762,000, and 6 were not recorded as leased or purchased. Also, of the 843 items listed, 109 could not be located, including 58 items being leased for \$304,000 a year and 51 items purchased for \$480,000. We reported this finding to local officials for investigation and to Interior's inspector general's office.

The following table summarizes the results of the local offices' investigations of the equipment that could not be found.

<u>Reported reason for shortage</u>	<u>No. of items</u>
Equipment reported to be at offices other than those shown on list	60
Equipment duplicated on inventory sheets	14
Equipment returned to suppliers but not removed from inventory sheets	12
Equipment not delivered by suppliers	2
Items listed as part of larger equipment purchase and therefore not identifiable	<u>2</u>
Subtotal	90
Could not explain shortage	<u>19</u>
Total	<u><u>109</u></u>

The 19 items that Bureau officials could not account for included a small computer, seven computer terminals, seven word processors, a printer, one disk drive, and two tape drives. The Bureau put the value of this equipment at \$187,000. We did not verify the locations of the 60 items that were said to be at locations other than those shown on the center's inventory sheets.

According to the Bureau official responsible for maintaining the inventory, the understatement occurred because only 4 of the Bureau's 6 area offices included in our review reported ADP equipment inventories for themselves and for local offices in their areas in 1982. Inventory data for the other two offices were based on prior years' information. Overall, only 8 of the Bureau's 12 area offices reported ADP equipment inventories for themselves and for local offices in their areas in 1982.

In developing the inventory, the Bureau official relied on unverified reports submitted by local office purchasing agents. Furthermore, the official did not regularly conduct physical inspections to confirm the accuracy or reliability of information provided by local offices. Instead, he requested that staff from the administrative services center inventory equipment whenever they visited local offices. The official acknowledged that this practice had not been very productive for verifying or updating inventory information.

ADP EQUIPMENT WAS GOING UNUSED

Our visits to 17 local offices showed that 381 items of ADP equipment--ranging from small-scale computers to word processors and computer terminals--were not being used. This represents 29 percent of the 1,325 items we were able to locate. Many of the items sat idle because local offices (1) had no space or use for the items or (2) did not have software, communications lines, or trained staff to operate the equipment.

Allowing equipment to go unused continually is wasteful. Of the 381 unused items, 326 were being leased for an annual cost of \$687,000, and 43 had been purchased for a total of \$222,000. The Bureau was unable to verify whether it had leased or purchased the remaining unused 12 items.

Our briefings prompted the Congress, the Bureau, and Interior to take action to prohibit the Bureau from acquiring ADP equipment it did not need.

Information network equipment was not put to use

Of the 381 pieces of unused equipment, 250 pieces had been leased since February 1982 and were to have been used in establishing a Bureau-wide information network, called the Area and Agency Distributed Interchange Executive (AADIX). The annual lease cost on those items of unused AADIX equipment was more than \$450,000.

The Bureau's 5-year ADP plan calls for the Bureau to establish a network of computers to be installed at the administrative services center and selected area offices. These computers are to serve as servicing points for a network of computer terminals located at agency offices and schools. The AADIX network has two

principal functions: (1) to provide computer capability for the Bureau's mission-oriented functions, such as education and social services, and (2) to provide a communications and data service facility for administrative systems, such as payroll and personnel.

By January 1983 the Bureau had acquired more than 1,200 items of ADP equipment for the network under a 5-year, \$15.5 million lease signed in November 1981. According to Bureau officials, many of the items were not included on the Bureau's inventory sheets because local offices were not required to report leased items.

Local offices gave the following reasons for not using 215 of the 250 pieces of AADIX equipment, which had gone unused since delivery:

- 100 items were delivered before local offices had prepared adequate facilities.
- 70 items required software, communications lines, or trained staff, which local offices did not have.
- 34 items were not needed.
- 11 items were delivered to the wrong offices and were awaiting shipment to another local office.

No reason was given for not using the remaining 35 items.

In delivering the equipment to local offices before adequate facilities were prepared, the Bureau deviated from its own regulations which state, in part:

"Installation of equipment will not be accomplished until after the site has satisfactorily passed a readiness review to assure that the equipment costs are not incurred until the organization is able to use the equipment. Site readiness reviews will be directed by the Administrative Services Center with the participation of the affected office's ADP Coordinator."³

The Bureau had equipment delivered to local offices before facilities were ready because it had decided that the rapid acquisition of equipment was the most critical element in establishing the network. In our opinion, this was not a good decision.

During our visits, we found unused and unneeded equipment for AADIX stored in a hallway and in warehouses, sitting on or under tables and desks, and pushed off to the side in computer rooms and other work areas. For example, equipment for the Portland area

³Bureau of Indian Affairs Manual (pt. 35, sec. 4.2(D)).

office was delivered in June 1982 but could not be installed because the office did not have the facilities needed for installation. So 2 computers, along with 92 associated items, went unused until July 1983 when an adequate facility was obtained. In the meantime, the Bureau paid about \$135,000 in lease costs on the unused equipment and an additional \$1,300 in storage costs.

When we checked in April 1984 with the office's assistant director for administration, we were told that the equipment had been installed on July 7, 1983. According to the assistant director, the office does not have enough trained personnel, software, and communications lines to use the equipment effectively. So instead, since July the office has used the equipment to train local area office personnel and to convert software that will be needed to manage information on tribal enrollment, irrigation, and forestry.

In supplying equipment to users before determining their equipment needs, the Bureau did not comply with two stipulations of its 5-year ADP management plan: (1) that local offices' equipment requirements be determined in advance of installation and (2) that the amount and type of equipment supplied to local offices would depend on the offices' volume of transactions.

The Bureau did not make a detailed examination of user equipment needs before acquiring equipment because it believed such an examination would take too long. Bureau officials now believe, and we agree, that the Bureau erred by not taking the time to clearly define user equipment needs. The effects of the Bureau's actions were unnecessary confusion, delays, and costs and no assurance that the Bureau had acquired the proper ADP equipment for establishing AADIX. For example, a school superintendent in Montana, when asked to justify how the school planned to use its AADIX equipment, wrote:

". . . you surely can understand why it is impossible to justify the use of a computer we didn't order, didn't know was coming and yet are being asked to justify its use and bear a portion of the cost."

ADDIX project manager did not provide necessary supervision

Although the Bureau assigned a project manager to oversee the installation and adaptation of equipment acquired for the AADIX network, he did not provide day-to-day supervision, coordination, and control, partly because of uncertainty about his responsibilities and partly because of budget cuts. As a result, the Bureau did not effectively manage conflicts and priorities, meet resource requirements, or anticipate and deal with schedule slippages. In addition to not following government regulations, the Bureau had no assurance that the total network requirements were being met.

We could not ascertain the project manager's exact responsibilities or the extent of his authority because he had no job description. The project manager's main responsibility, as far as we could see, was converting computer software being run on other types of ADP equipment to work on the AADIX equipment. He planned to have his staff visit local offices to determine whether they had (1) the correct type and amount of AADIX equipment and (2) the necessary communications lines, technical staff, software, and training to effectively use the equipment. However, the project manager never got to implement this plan because the Bureau cut his budget by 25 percent in fiscal year 1983. Instead, he relied on invoices supplied by the AADIX vendor to keep informed of equipment deliveries. The project manager also relied on users at the local office level to approach him, unsolicited, with ideas on how the equipment could be used to meet local offices' information needs. When so approached, he helped the offices develop specifications for needed computer software and submitted their proposals to various Bureau contractors for development of the applications.

By April 1984 the project manager's primary responsibility had shifted to standardizing computer software to be used on AADIX equipment.

Actions taken to prevent acquisitions
of unneeded AADIX equipment

On the basis of our briefings--provided from October 1982 to September 1983--the Bureau, Interior Department, and the Congress took several steps to ensure that additional AADIX equipment was not acquired.

On October 29, 1982, the Bureau's contracting officer told the AADIX equipment vendor to halt immediately the delivery of all hardware and software until further advised. The hold affected about \$1.7 million of equipment.

On July 1, 1983, Interior prohibited the Bureau from further modifying the AADIX contract without prior written approval from Interior's IRM office. On September 23, 1983, Interior imposed additional restrictions on the Bureau, which included prohibiting it from processing or carrying out any contractual obligations without departmental approval. The new restrictions are to remain in effect for the life of the contract.

On September 30, 1983, the Congress cut funds provided to the Bureau in fiscal year 1984 for either the purchase or lease of additional ADP equipment, including equipment for AADIX, or for the acquisition or development of additional hardware or software systems. The Congress also agreed that no funds would be provided for planned charges to network users. In addition, the Congress instructed the Bureau to cancel leases for all unused equipment and to return the equipment to the supplier. These actions reduced the Bureau's requested 1984 budget request by \$8.4 million, from \$11.4

million to \$3 million. On February 28, 1984, the Bureau reported to the Congress that it had already identified 270 items of un-needed AADIX equipment to be returned to the vendor as soon as possible.

Non-AADIX equipment also sat idle

The remaining 131 items of unused ADP equipment we observed had been acquired by local offices to help their employees collect, use, and distribute information about Indians. According to local office officials, non-AADIX equipment--some of which had been acquired as far back as 1979--had generally gone unused since it was acquired for reasons similar to those that caused AADIX equipment to go unused. For instance, we found that

- 42 items were not needed;
- 18 required software, communications lines, or trained staff, which local offices did not have;
- 9 were acquired before adequate facilities were available;
- 1 was delivered to the wrong office; and
- 1 did not work and the local office did not believe it was worth repairing.

No reason was given for not using the remaining 60 items.

Of these 131 items, 76 were being leased for an annual cost of \$237,000 and 43 had been purchased for \$222,000. The Bureau was unable to verify whether it had leased or purchased the remaining 12 items.

BUREAU OVERLOOKED OPPORTUNITIES TO USE AVAILABLE ADP RESOURCES TO IMPROVE PRODUCTIVITY AND SERVICE

Because the Bureau did not have adequate controls over its ADP equipment, it overlooked opportunities to use the technology to improve productivity, reduce waste, and improve service. During our visits, we observed inefficient uses of ADP technology, which increased the cost of information handling and adversely affected productivity and the quality of services provided to Indians. The following cases demonstrate how available ADP technology can be better used.

Management of oil royalty data can be improved

The Osage agency office collects royalties and revenues derived from mineral production activities on Osage land. In fiscal year 1981, recorded oil and gas royalty income was \$76.4 million.

The office's mineral management responsibilities include monitoring more than 15,000 operating oil and gas wells on about 1.5 million acres of Osage land.

By using available computer technology more extensively to control lessee reporting, verify royalty payments, and collect information from oil and gas buyers, the office could reduce the number of time-consuming, repetitive tasks now being done by hand. This could result in more effective and efficient oil royalty operations. Bureau officials estimate that using computer technology could free the equivalent of five full-time employees for other functions.

To determine when required monthly lessee reports on about 4,000 oil and gas leases are not submitted, the office manually screens key-punched cards and then notifies the delinquent lessee by phone or letter. The office's computer could be programmed to first determine which lessees did not submit monthly reports, and then to automatically produce letters notifying lessees. At the time of our visit, office officials were considering automating this procedure and believed that doing so would release one full-time employee for other duties.

Oil and gas royalty payments made by lessees were also verified manually. Using desk calculators, employees compared lessee production figures with buyer purchase information and calculated royalty income. In September 1982, the office was 8 to 10 months behind in verifying monthly royalty payments on the 4,000 leases. Royalties received during this 8- to 10-month period amounted to \$36.5 million. Working overtime, the agency eliminated its backlog by April 1983. After we advised Osage agency office officials that the royalty verification process could be done more effectively and efficiently on the office's computer, they agreed to automate the process. Office officials believe that, as a result, about four full-time employees will become available for other duties. When we checked in April 1984 with the official responsible for managing the office's oil royalty data, we found that oil and gas royalty payments were still being verified manually. The official said that the office was still working on automating the process but that little had been done since we completed our field work in April 1983.

Another opportunity for savings through technology involves the monthly buyer reports submitted on the 4,000 oil and gas leases. Oil and gas lease data from such reports are manually entered into the office's computer. By having buyers submit monthly reports in automated form--such as magnetic tape, disk, or electronic transmission of data--the Bureau could reduce paper handling costs. In fact, some respondents create the Bureau-required hard copies by printouts from their own computers. Officials at Osage believed that, if asked, respondents could provide their reports in automated form and thereby reduce their costs and the Bureau's.

Administrative costs for
overseeing individual Indian
money accounts can be reduced

The Osage agency office used a computer to maintain about 1,700 individual Indian money (IIM) accounts. Office officials estimated that \$21,000 a year is saved by using the computer, instead of previously used posting machines. The savings result from a reduction in the effort needed to manually prepare computations; post, balance, and verify accounts; and prepare and mail checks to clients.

We believe the cost of maintaining IIM accounts at other local offices could be reduced by using similar computer technology. For example, the Bureau's Anadarko and Pawnee agency offices and the Muskogee area office used manual processes, assisted by posting machines, to maintain their IIM accounts. Each of the three offices maintained more IIM accounts than did Osage; Anadarko, Pawnee, and Muskogee maintained 14,000, 5,000, and 5,300 IIM accounts, respectively. On the basis of the cost savings the Osage agency office experienced, we estimated that the three offices could, together, save more than \$300,000 a year by automating their IIM operations.

In October 1982 Anadarko, Pawnee, and two additional local offices began automating their IIM accounts. Additional savings could possibly be achieved by automating the IIM accounts at other local offices. The Bureau maintains an estimated 240,000 IIM accounts nationwide.

CHAPTER 3

INFORMATION SYSTEMS DEVELOPMENT PROGRAM

LACKS DIRECTION

Systems development efforts at the Bureau of Indian Affairs are fragmented and uncoordinated. Currently, 99 different managers independently develop, implement, and maintain information systems.⁴ Such uncoordinated management has resulted in duplicative and overlapping systems. Also, the Bureau has experienced delays in setting up an Indian education information system to store information on student enrollment, community demographics, school facilities, and other related topics.

In fiscal year 1983, the Bureau spent \$19 million for information systems development and maintenance activities; it expects to spend \$19.4 million in fiscal year 1984 and more than \$20 million in fiscal year 1985. Because of the high cost involved, coordinated, effective management of information systems development and maintenance is important.

SYSTEMS DEVELOPMENT EFFORTS ARE DUPLICATIVE AND OVERLAPPING

Section 3506(c) of the Paperwork Reduction Act requires agencies to systematically inventory their major information systems and to ensure that systems do not overlap or duplicate one another. Despite these requirements, the Bureau has yet to develop a complete, up-to-date inventory of its information systems, or review existing information systems for duplication and overlap.

The Bureau has had a problem with duplicative and overlapping information systems for several years. In 1979, for example, the Bureau formed a committee to review data systems that captured information about people. The committee identified five existing systems, and four systems being designed, that maintained such data. Even though they duplicated and overlapped one another, all nine systems still exist.

In 1980 a consultant advised Bureau management that information systems were being developed without central control and recommended that developmental activities be centralized. Responding to the recommendation, the Bureau gave its administrative services center responsibility for approving local offices' acquisition of ADP equipment for information systems development. But the Bureau did not give the center authority to (1) control funds used for developing and maintaining information systems or (2) direct

⁴The Interior Department defines an information system as an orderly combination of human resources, technology (hardware and related software), and established methods and procedures used to collect, process, and communicate data in the form needed.

and coordinate local office information systems applications. The center receives funds for system development projects from local offices, which control how funds are spent; the center cannot question their decisions. As a result, systems development has continued to be fragmented and controlled by the Bureau's 4 program directors, 12 area office directors, and 83 agency office superintendents.

Also, inspector general reports show that Bureau information systems development efforts are ineffective and require top-level attention. For example, a December 1981 report by Interior's Office of Inspector General found that the Bureau's systems development efforts were "out of control . . . confused and lacking direction." According to the report, systems seemed to "spring up" at all levels within the Bureau without regard to what already existed or what was under development. Commitments to manage systems development activities were made only on paper. According to the report, although special task groups continually studied, reported, and recommended, nothing changed. A strong, centralized control mechanism was called for to ensure that priorities were properly arranged, adequate resources were made available to finish what was started, and duplication was eliminated. Some of the inspector general's findings are summarized below.

- In reviewing systems used to maintain information on people, the inspector general report found direct duplication between the Integrated Records Management System and the Indian Services Information System. The Integrated Records Management System is to provide Bureau offices an automated means of keeping various records on Indian people and land and to integrate these records to avoid duplication. These records are to be used in (1) determining eligibility of individuals for tribal group benefits, (2) distributing funds to approved enrollees, and (3) gathering census or ownership data for planning purposes. Indian Services Information System data are to be used for precisely the same purposes. The report stated that, after \$3.6 million and 9 years of effort, the Integrated Records Management System was operating in only one agency office.
- In the case of land records, the report stated that the Bureau had a "gigantic problem which could only get worse." To address the problem, the Bureau established five centers responsible for maintaining official land ownership records. According to the report, however, local offices continued to maintain their own records because the centers' records were inaccurate and the Bureau had no system for making the records available to offices that needed them.
- Multiple efforts were underway to develop an automated system for managing Indian irrigation project information. The duplication, according to the report, stemmed from a

lack of Bureauwide planning and management of irrigation information.

EFFORTS TO DEVELOP AN INDIAN
EDUCATION INFORMATION SYSTEM
HAVE NOT BEEN SUCCESSFUL

Section 1132 of the Education Amendments of 1978 (Public Law 95-561) required that the Secretary of the Interior establish, by October 1979, a computerized information system to ensure effective delivery of educational services to Indians. The system, which would coordinate educational information in the Bureau's agency, area, and central offices, was to include information on enrollment, curriculum, staff, facilities, community demographics, and student assessments at all Bureau schools.

Although the Bureau's Office of Indian Education Programs has spent about \$2.4 million between 1979 and 1983--\$300,000 for 12 minicomputers and \$2.1 million for software--the system still is not operational.⁵ The major factor contributing to the Bureau's not getting the system in place is a rapid turnover of project directors.

In a February 1981 status report on the system's development, the Bureau noted that, if the Indian education information system was to be successful, the Office of Indian Education Programs needed to appoint a project director who would provide national leadership in (1) determining how the system would be used, (2) implementing schedules for various subsystems under development, (3) managing the use of existing data, and (4) defining and ranking local office information and systems needs.

Seven directors have overseen the system's development--three before the 1981 status report was issued and four after. None has provided the type of national leadership envisioned by the Bureau, however. As the following table shows, only three of the seven directors brought data processing or systems development expertise with them to the job, and none of the three served longer than 6 months.

⁵On September 30, 1983, the Congress cut funds provided to the Bureau in fiscal year 1984 for the acquisition and development of additional ADP equipment and software for the system.

<u>Project director</u>	<u>Start of term</u>	<u>Length of term</u>	<u>Background of project director</u>
1	June 1980	6 months	Computer technician
2	Dec. 1980	1 month	Education specialist
3	Jan. 1981	5 months	Computer technician
4	May 1981	3 months	Chief of planning and program development
5	Aug. 1981	12 months	Education specialist
6	Aug. 1982	4 months	Agency superintendent with some experience in systems development
7	Jan. 1983	Present	Education specialist

Rapid turnover in project directors was virtually assured because the position was established as a 120-day temporary assignment; only two incumbents served for 1 year or longer.

Due to the directors' different management philosophies, their varying levels of data processing expertise, and the short time they had to familiarize themselves with their duties and responsibilities, a systematic, orderly approach to developing the system has not emerged. Further, the directors have offered little direction and guidance to area education office managers. Consequently, education managers at the offices visited expressed uncertainty about

- how the ADP equipment they had acquired for the system should be used,
- their role as coordinator in implementing the information system at the area level,
- headquarters' plan for using existing computer equipment in view of the Bureau's move to standardize computer hardware for the AADIX network, and
- what software was available.

When we checked in November 1983 with the Bureau, we found that it still had not established the Indian education information system. The acting director of the Bureau's Office of Data Systems said that the Bureau hopes to have the system established by 1986. The acting director expressed uncertainty about whether the ADP equipment that had been acquired for the system in 1979 could be used by the Bureau, because the Bureau has decided to place the

system on the AADIX network. The Bureau hopes that local offices can find some use for the ADP equipment; otherwise, it may be surplus.

In May 1984, the Bureau told us it had appointed a permanent manager to oversee development of the system. In addition, the Bureau has awarded a contract to the Minnesota Education Consortium Company to develop software for the system.

CHAPTER 4

FORMS MANAGEMENT PROGRAM DOES NOT

COMPLY WITH PAPERWORK REDUCTION

ACT REQUIREMENTS

The Bureau of Indian Affairs is not complying with provisions of the Paperwork Reduction Act, which state that an agency cannot collect information from the public unless it uses forms approved by the Director of OMB. The Bureau's paperwork management branch, which is responsible for ensuring that local offices comply with the act, has not been doing its job. We found 128 unapproved forms being used to collect education and social services data at the 17 local offices visited. In addition, 15 OMB-approved forms for the education program had not been distributed for local offices' use.

The Paperwork Reduction Act also states that individuals cannot be penalized for failing to comply with an information collection request if the form does not display a currently valid OMB control number or does not state that the request is not subject to the act. Not using approved forms could cause administrative problems for the Bureau.

UNAPPROVED FORMS ARE BEING USED TO COLLECT INFORMATION FROM THE PUBLIC

The Bureau's paperwork management branch does not monitor local offices to ensure that they are using approved forms, as required, and that approved forms are being distributed. As a result, the Bureau does not have control over its information collection efforts.

The paperwork management branch is responsible for submitting Bureau forms through the departmental IRM office to OMB for approval. According to the Paperwork Reduction Act, an agency is not to collect information from 10 or more persons unless the Director of OMB has first approved the proposed collection and assigned a control number to be displayed on the information collection request. The act defines an information collection request as a written report form, application form, schedule, questionnaire, reporting or recordkeeping requirement, or other similar method for collecting information.

Once approved by OMB, paperwork branch officials send the form to the respective program office for distribution to local offices, but the officials do not follow up to ensure that local offices receive and use approved forms. This responsibility rests with the program offices.

During visits to local offices, we obtained copies of all forms being used to collect information for the Bureau's

education and social services programs. Overall, we collected 128 forms--66 for education information and 62 for social services information. None of the forms displayed an OMB control number indicating they had been approved for use. Furthermore, 15 education forms that OMB had approved in August 1982 were not being used. According to paperwork management branch officials, local offices were not using these forms because the Office of Indian Education Programs had not provided them.

When we checked with the Office of Indian Education Programs in October 1983 to update our information, we found that it had, in fact, distributed the OMB-approved forms to local offices. The local offices were told that the education forms they were receiving were the official forms to be used and that no other forms were to be used to collect information from the public. The Office of Indian Education Programs had no plans, however, to monitor the local offices to ensure that they used the approved forms.

The social services forms we obtained also should have had OMB control numbers. In 1981 OMB gave the Bureau provisional approval for local offices to continue using locally developed forms for 2 years, allowing OMB time to review and approve the forms. The paperwork management branch instructed the social services branch to have local offices place the provisional OMB control number on locally developed forms, but the paperwork branch had no way of ensuring that this was done. In addition, the one OMB-approved social services form was not in use because a change in the program made it obsolete.

The social services branch agreed to provide 43 forms that needed OMB review and approval to the paperwork management branch by June 26, 1983. As of April 27, 1984, the branch had yet to submit acceptable clearance request packages for the forms. Although the branch's Indian child welfare staff submitted a draft clearance package for its forms in June 1983, the paperwork management branch determined that it was incomplete. The social services branch's general assistance staff had yet to submit any forms for review and approval.

In April 1983 the provisional clearance for social services forms expired. As a result, local offices were using unapproved forms to collect information from the public. When officials of the paperwork management branch asked social services branch officials why they had not submitted any forms, they said they did not have time because of a backlog of appeals cases that had to be closed, and because they were revising social services regulations.

USING UNAPPROVED FORMS COULD
CAUSE PROBLEMS IN THE FUTURE

The Bureau's dependence on unapproved forms could pose problems in managing various programs. The Paperwork Reduction Act's public protection clause (sec. 3512) states that a person cannot

be penalized for refusing to complete an unapproved form or a form that does not state the request is not subject to the act. Therefore, if a form used for the receipt of a benefit (such as admission to a post secondary education program) does not display a valid OMB control number or a statement that the form is not subject to the Paperwork Reduction Act, the Bureau cannot use a person's failure to comply as grounds for withholding the benefit. Rather, the Bureau must permit respondents to prove or satisfy legal conditions in some other manner.

By not collecting the appropriate information, Bureau personnel may find it difficult to determine the true amount of benefits to which the applicant is entitled, resulting in a breakdown in program administration. Furthermore, the Bureau would not have the documentation to support the expenditure of public funds.

CHAPTER 5

INTERIOR HAS NOT BEEN SUCCESSFUL IN CORRECTING THE BUREAU'S LONGSTANDING IRM SHORTCOMINGS

Although Interior's IRM office knew about the Bureau's long-standing IRM problems and had identified ways to improve the Bureau's management structure, it did not ensure that the Bureau took effective corrective action. The office believed it was to operate primarily in an advisory capacity, and therefore provided only advice and technical assistance. This approach is inconsistent with federal policy and Interior's departmental orders.

To control the waste and inefficiency resulting from what it called the Bureau's and Interior's mismanagement of ADP resources, the House Committee on Appropriations, in June 1983, directed the Bureau and Interior to undertake a series of actions before requesting additional funds. These actions are aimed at establishing management control over the Bureau's ADP activities. Although Interior and the Bureau have taken some of the actions directed by the Committee, they still have not fixed responsibility for IRM in one Bureau office. As a result, there is little assurance that the Bureau will be able to remedy its longstanding problems.

IRM OFFICE HAS IDENTIFIED STEPS FOR IMPROVING BUREAU MANAGEMENT OF INFORMATION RESOURCES

Interior's IRM office recognizes that the Bureau's information management practices are ineffective. According to departmental IRM office officials, the principal factors preventing the Bureau from establishing an IRM program are

- a lack of a management structure in the ADP, records management, paperwork management, and telecommunications areas;
- constant turnover in key personnel and the resultant strategy changes; and
- a lack of qualified personnel to manage IRM activities.

Bureau officials agreed with the first two items. Regarding the third item, they said they faced extreme difficulty in hiring and retaining qualified ADP personnel. According to these officials, the difficulty stems, on the one hand, from the statutory preference given to Indians in Bureau hiring and promotions and, on the other hand, from a shortage of qualified data processing professionals who are Indians.

Our review of the Indian preference legislation did not persuade us that its requirements create as great an obstacle to filling vacancies as the local office officials suggested. Clearly, the Bureau's Indian preference is not limited to initial appointments but includes promotions, reassignments, lateral transfers, and numerous reduction-in-force situations. Preference, however, is not absolute, and, in appropriate circumstances, non-Indians may be hired or promoted to further the Bureau's efficiency. Non-Indians are appointed on an exception basis only, and each such appointment must be separately justified and documented.

Officials from Interior's IRM office identified four steps the Bureau must take to establish an effective IRM program:

- Reorganize functional areas, such as ADP, records management, and telecommunications, so that clear lines of authority and responsibility are established.
- Regroup and develop a strategy for acquiring and using information technology, such as ADP equipment acquired for the AADIX network.
- Appoint a strong leader to pull the Bureau's various IRM functions together.
- Fix responsibility and accountability for program management.

Departmental IRM office officials concluded that, until the Bureau established a management structure fixing accountability and responsibility, Interior could do nothing to improve IRM at the Bureau.

IRM OFFICE'S PRACTICES ARE
INCONSISTENT WITH FEDERAL POLICY
AND INTERIOR DIRECTIVES

Although the IRM office identified steps for improving the Bureau's management of information resources, it did not ensure that the needed actions were effectively carried out. In addition, the IRM office has not fulfilled its assigned responsibilities at the Bureau. On the basis of its interpretation of the Paperwork Reduction Act and OMB Bulletin No. 81-21, the IRM office believed that (1) IRM structures were not required below the departmental level and (2) Interior's senior official⁶ was required to operate only in an advisory capacity. Officials in the departmental IRM

⁶Section 3506(b) of the act states that "The head of each agency shall designate . . . a senior official . . . who report(s) directly to such agency head to carry out the responsibilities of the agency. . . ."

office also told us that departmental policy gives bureaus a great deal of latitude in how they carry out their missions and how they report to the Department. The Assistant Secretary for Policy, Budget and Administration (Interior's senior official) has delegated to the director of the IRM office the authority for carrying out Interior's responsibilities under the Paperwork Reduction Act.

IRM Office did not carry out senior official responsibilities

We examined the Paperwork Reduction Act, OMB Bulletin No. 81-21, and departmental regulations to determine whether the departmental IRM office's interpretations complied with the act and applicable departmental orders. We concluded that all of the responsibilities assigned to the senior official contemplate an active, agencywide role. Providing assistance to subcomponents of an agency, such as Interior bureaus, on a purely advisory basis with no attempt to direct or monitor their information resources management activities would amount, in our view, to an abdication of a major part of the senior official's responsibilities. Section 3506(c) lists the following major tasks for which the senior official is responsible:

- Systematic inventories of the agency's major information systems.
- Periodic reviews of agency information management activities which are defined to include "planning, budgeting, organizing, directing, training, promoting, controlling, and other managerial activities involving the collection, use, and dissemination of information."
- The prevention of internal and external duplication of information systems.
- The development of procedures to assess the paperwork burden of proposed legislation affecting the agency.
- The acquisition of ADP equipment and services when the Administrator of General Services has delegated such functions to the agency under 40 U.S.C. § 759.

The remainder of the Paperwork Reduction Act similarly envisions an agencywide, directive role for the senior official. For example, section 3507(e) discusses OMB's delegation of authority to the senior official to approve agency information collection requests in appropriate circumstances. It is difficult to envision an OMB delegation to the Interior senior official that would include Department-level information requests but exclude Bureau-level requests.

Further, in characterizing the senior official's agencywide responsibilities, OMB Bulletin No. 81-21 uses such terms as

"developing," "reviewing," "implementing," "conducting and being accountable for," and "assisting." This language clearly indicates a much more direct and accountable role for the senior official than that of acting only in an advisory capacity, both on the departmental level and on the bureau level.

Chapter 10 of Interior's Departmental Manual continues the theme of the senior official's operational role. For example, section 10.3B(6) states that the IRM office's division of IRM program assessments "reviews, approves and monitors the acquisition of ADP resources . . . by bureaus and offices within the Department . . ." Section 10.3F states that the IRM office's division of telecommunications "is responsible for the coordination of telecommunications networking . . . for the Department and bureaus/offices."

Rules published by OMB (5 C.F.R. § 1320.8 (a)) to implement parts of the act explicitly describe the senior official's active role as follows:

"(1) The Senior Official shall report directly to the head of the agency and shall have the authority, subject to that of the agency head, to carry out the responsibilities of the agency under the Act and this Part.

"(2) The Senior Official shall independently assess all collections of information to insure that they meet the criteria specified in § 1320.4(b) and that the agency conducts no collection of information that does not display a currently valid OMB control number." 48 Fed. Reg. 13666, 13678 (Mar. 31, 1983).

Based on this interpretation, the IRM office has not fulfilled its assigned responsibilities at the Bureau, such as

- inventorying major information systems;
- reviewing information management activities related to planning, budgeting, organizing, directing, training, promoting, and controlling activities involving the collection, use, and dissemination of information; and
- ensuring that existing information systems do not overlap or duplicate one another.

We believe that the authority given to Interior's senior official and delegated to Interior's IRM office is adequate to meet all the operational and advisory responsibilities for the Interior Department, including the Bureau of Indian Affairs, and to perform all federal agency activities prescribed by the Paperwork Reduction Act.

Bureau IRM structure could be established

We could not conclude from our review of the Paperwork Reduction Act that agency components below the departmental level are required to establish IRM structures. We did determine, however, that, because the act clearly requires agencywide implementation of IRM responsibilities, nothing in the act precludes such formation. Therefore, to the extent that a formal IRM structure at the Bureau would help implement the act's requirements, it would clearly be appropriate.

This view is supported by House Report 835, 96th Cong., 2nd sess. 7 (1980), which states that the "intent [of the Act] is to establish an identifiable line of accountability for [IRM] activities between the Director [of OMB] and individual agencies and within agencies." In our opinion, the Bureau's distinct constituency and mission would clearly provide support for its own IRM structure, under Interior's supervision. This structure should parallel other Bureau authority and operations. For example, the Snyder Act of 1921 (25 U.S.C. § 13 (1976)) gives the Bureau authority to "direct, supervise, and expend such moneys as Congress may from time to time appropriate for the benefit, care and assistance of the Indians . . ." subject to the supervision of the Secretary of the Interior.

ACTIONS TAKEN TO CORRECT ADP MISMANAGEMENT AT THE BUREAU

The Bureau, in response to recommendations made in a congressional report, has taken steps to improve its management of information resources. Because the Bureau's current approach is similar to those used in the past, however, identified problems may not be resolved.

Bureau took steps to respond to congressional concerns

On May 20, 1983, we briefed the House Committee on Appropriations on the Bureau's approach to managing information resources. The Committee agreed with our assessment and, in a June 1983 report,⁷ stated that the waste and inefficiency resulting from the Bureau's and Interior's mismanagement were evident to those who studied it, but that little or nothing was done to correct identified problems. The report concluded that Interior's IRM program apparently had not touched the Bureau.

The Committee directed that, before requesting additional funds for data processing activities, the Bureau and Interior

--accurately inventory all owned and leased ADP equipment;

⁷House Report 253, 98th Cong., 1st sess. (1983)

- cancel leases for unused equipment and return the equipment to the supplier;
- appoint a highly qualified ADP management professional with sufficient authority, staff, and other resources to plan and manage the Bureau's ADP activity;
- reassign, hire, or otherwise appoint thoroughly competent professionals to all key ADP positions;
- study the data processing requirements of users and devise short- and long-range plans for meeting the requirements most efficiently;
- implement short- and long-range plans under the direct supervision of the highest management officials of the Bureau and Department; and
- develop and implement a data processing guidance and training plan.

In January 1984, the Bureau issued a report in response to the House Appropriations Committee's recommendations. According to the Bureau, the problem surrounding its ADP operations resulted, for the most part, from one major issue: the lack of a central manager whose sole responsibility was ADP. The Bureau report stated that "there are no magic cures," but that the establishment of an Office of Data Systems within the Bureau should greatly increase control over ADP operations. The office was to have sole responsibility for all ADP-related matters in the Bureau. The report stated this would assure ongoing management and support for the Bureau's ADP users and functions. The report further stated that the long-range solution was more complex and that rectifying the situation would take time and well-planned action. The report highlighted some of the Bureau's accomplishments and plans, as they related to the Committee's concerns:

- Preparing a position description for the Director of the Office of Data Systems.
- Preparing a preliminary organization structure for the Office of Data Systems.
- Establishing a task force to develop an inventory of all ADP equipment.
- Identifying certain ADP equipment as surplus.
- Placing a moratorium on the acquisition of new ADP equipment and software.
- Initiating a project to modify the Bureau's cost coding procedures and structure to provide more detailed and accurate cost data on ADP services, equipment, maintenance, and development expenditures.

Because the Bureau had not fully implemented these actions by August 1984, we could not assess their effectiveness. The approach being taken by the Bureau in rectifying its problems, however, is similar to that used in the past. For example, in January 1980, the Bureau issued an ADP management plan outlining its plans for establishing a cost-effective, integrated, Bureauwide data processing program. Under the plan, responsibility for Bureauwide data processing coordination, policy development, and standards was assigned to a central management and control group at the administrative services center. The group did not, however, provide the leadership needed for effective control over ADP resources. Inadequate guidance and an unclear delegation of authority by the Bureau's top management, combined with inadequate control over the expenditure of ADP funds, hampered the group's efforts.

Bureau needs to do more to
rectify identified IRM problems

Although the establishment of an Office of Data Systems can help overcome the Bureau's ADP equipment problems, we do not believe it goes far enough to overcome the Bureau's overall IRM problems. In particular, the Bureau needs to address issues related to (1) fixing responsibility and accountability for managing all the Bureau's information resources with one person and (2) hiring and retaining qualified ADP personnel. The Bureau plans to assign responsibility to the director of the Office of Data Systems for establishing, implementing, and reviewing Bureauwide policies, plans, and processes related to ADP and data communications systems. However, it has not provided the office the necessary authority to carry out these responsibilities. To illustrate, the Bureau has not made the office accountable for (1) controlling funds used in developing and maintaining information systems, (2) directing and coordinating local office information systems efforts, or (3) ensuring that Bureau offices use only OMB-approved forms when collecting information from the public.

Unless the Bureau addresses the issues of accountability and hiring, its efforts to correct longstanding IRM problems could continue to falter. In addition, ensuring that these issues are adequately addressed and that problems are corrected will depend on the departmental IRM office's effectiveness in carrying out assigned responsibilities.

CHAPTER 6

CONCLUSIONS, RECOMMENDATIONS, AND AGENCY COMMENTS AND OUR EVALUATION

The Bureau's inability to use information resources to their full potential is indicative of a systemic problem: the need for an organization, structure, and discipline for managing information resources. Such a structure could help fix accountability and responsibility and ensure that guidance and supervision are provided to Bureau offices in acquiring, installing, and using various information resources, such as computers, automated information systems, and forms.

The Assistant Secretary for Indian Affairs is not effectively managing the Bureau's information resources. In the past, two factors have hampered the Assistant Secretary's efforts. First, Bureau employees did not follow policies and procedures prescribed by the Paperwork Reduction Act, GAO, OMB, the Interior Department, and the Bureau. Second, the Bureau's management philosophy allows for the separation of accountability from responsibility in (1) managing ADP equipment and (2) complying with the requirements of the Paperwork Reduction Act in collecting information from the public.

Bureau management also diffuses responsibility for information systems development among 99 managers. As a result, the Bureau has spent millions of dollars acquiring and maintaining ADP equipment it could not use or did not need. It has also spent millions developing information systems that duplicate and overlap one another, experience prolonged developmental cycles, do not meet user needs, or simply do not work.

In our opinion, the Assistant Secretary for Indian Affairs could improve the Bureau's management of information resources by appointing an information resources manager reporting directly to the Assistant Secretary or the Deputy Assistant Secretary for Indian Affairs. This person would be responsible and accountable for managing all of the Bureau's information resources, including ADP equipment, information systems, and public-use forms. Leadership is needed at the Bureau level to ensure

- Bureau employees follow prescribed policies and procedures;
- opportunities for using ADP equipment and other ADP-related technologies, such as automated information systems, do not go overlooked;
- the Bureau does not continue to spend money acquiring, maintaining, and storing ADP equipment it does not need or cannot use;

- unjustified delays in establishing the AADIX network and the Indian education information system are reduced;
- management information system development efforts are coordinated so that the Bureau does not spend funds needlessly developing and maintaining redundant and overlapping systems;
- the Bureau's rising information systems development and maintenance costs are regulated;
- effective controls for managing inventories of ADP equipment, automated information systems, and public-use forms are established; and
- only approved forms are used to collect information from the public.

IRM problems are not just limited to the Bureau. The Secretary of the Interior's means for correcting the Bureau's longstanding IRM problems have not been effective. The Secretary's designated focal point for IRM departmentwide, the Office of Information Resources Management, while aware of the Bureau's problems, did not ensure corrective action was taken because the office believed it lacked the authority to do so. As a result, IRM within the Bureau has not received the attention from the departmental level necessary to ensure that resources are acquired and used to improve service delivery and program management, increase productivity, and reduce waste. Many of these problems could have been resolved and millions could have been saved had the departmental IRM office taken a more aggressive approach. In our opinion, the departmental IRM office's position is not consistent with the IRM oversight responsibilities of the Assistant Secretary for Policy, Budget and Administration or with the Paperwork Reduction Act.

Congressional concern over ineffective IRM management resulted in the passage of legislation limiting funding for the Bureau's ADP activities during fiscal year 1984. The Congress directed that the Bureau and Interior, before requesting further funding for ADP activities, take several steps designed to strengthen control over the Bureau's ADP equipment. For Congress' directives to have a meaningful, long-term effect, it is important that the directives are implemented conscientiously. In our opinion, Interior's Assistant Secretary for Policy, Budget and Administration must assess Bureau progress in implementing Congress' goals and ensure that the Bureau's IRM practices and procedures conform with the Paperwork Reduction Act, OMB directives, and departmental regulations.

RECOMMENDATIONS TO THE
SECRETARY OF THE INTERIOR

The Secretary of the Interior can and should take some steps to improve the management of the Bureau's information resources-- some to maximize their use, others to reduce inefficiency, some to do both. We recommend that the Secretary do the following:

- Direct the Bureau's Assistant Secretary for Indian Affairs to either expand the responsibilities of the director of the Office of Data Systems or appoint a senior official to serve as the Bureau's IRM manager. This person, who should report to the Assistant Secretary or the Deputy Assistant Secretary for Indian Affairs, would be responsible and accountable for managing all the Bureau's ADP equipment, information systems development, and forms. The Bureau should reassign, hire, or otherwise appoint professionals to assist this manager in carrying out the assigned responsibilities.
- Direct the Assistant Secretary for Indian Affairs to establish better controls over ADP equipment, systems development efforts, and paperwork management activities by doing the following:
 - (1) Adopting procedures for (a) effectively monitoring the Bureau's ADP equipment inventory, such as taking periodic physical inventories, to provide a check on Bureau property controls and procedures as well as to test the extent to which ADP equipment continues to go unused and (b) ensuring that local offices comply with GAO, OMB, Department, and Bureau regulations on the inventory and control of ADP resources.
 - (2) Identifying unused and underused ADP equipment and evaluating the feasibility of increasing the use of this available ADP technology to improve Bureauwide service and program management, beginning with the oil royalty management, individual Indian money, and education programs. The Bureau should dispose of any ADP equipment that cannot be adapted to the Bureau's missions and return any unneeded leased equipment to the vendor.
 - (3) Continuing to prohibit the delivery of additional equipment for AADIX until the following has been done:
 - (a) User and management requirements are defined and decisions are made on where and when processing for different types of data will be done.
 - (b) Software is developed or converted.
 - (c) Site development tasks are completed.

- (d) An effective hiring and training plan is established.
 - (e) The following duties, responsibilities, and authority of the AADIX manager are clearly defined: providing day-to-day supervision of the acquisition, installation, and use of equipment; coordinating development activities; following applicable government regulations and standards; settling disputes and conflicts; adjusting project schedules; and ensuring that resources requirements are met.
 - (f) AADIX project manager's resources are sufficient to permit visits to local offices to monitor the delivery, installation, and use of AADIX equipment.
- (4) Reviewing ongoing information systems development efforts and continuing only those efforts that are necessary to fulfill Bureau missions and that do not duplicate existing systems.
 - (5) Inventorying the Bureau's information systems, as required by the Paperwork Reduction Act, and identifying duplicative and overlapping systems. Any duplicative and overlapping systems should be evaluated for consolidation or elimination.
 - (6) Establishing unified direction and control over the Bureau's information systems development efforts. Authority to develop systems should be withdrawn from the various offices and vested in the Bureau's IRM manager, who should also be given authority to control the funds for such development.
 - (7) Ensuring that ongoing and future major ADP equipment acquisitions and systems development efforts are overseen by permanent, full-time project managers whose duties, responsibilities, and authority are clearly established.
 - (8) Appointing a staff with a high level of data processing expertise, especially in the area of software development, to assist the education system project director.
 - (9) Inventorying the forms used by Bureau offices to collect information from the public. Identify any forms that are needed in the operation of Bureau programs but have not yet been approved by OMB and submit these forms through the departmental IRM office to OMB for approval.
 - (10) Directing the Bureau's program offices to coordinate their forms management activities through the paperwork management branch. The offices should provide timely

information to the branch on the printing, distribution, and use of OMB-approved forms.

- (11) Making the Bureau's paperwork management branch accountable to the Bureau IRM manager for ensuring that OMB-approved forms are distributed and used.

--Direct the Assistant Secretary for Policy, Budget and Administration, Interior's designated IRM official under the Paperwork Reduction Act, to do the following to preclude a recurrence of the types of management problems described in this report:

- (1) Prohibit the Bureau from acquiring any additional ADP equipment and related software without the Assistant Secretary's approval until it demonstrates that it has established effective management controls over these resources.
- (2) Alert Bureau program and local offices to the consequences of using forms that do not display valid control numbers, and require the Bureau to take appropriate steps to get OMB approval on unapproved forms.
- (3) Review, on a cyclical basis, the Bureau's information resources management activities, providing broad audit coverage, particularly of the ADP equipment, systems development, and forms management areas.
- (4) Work with the Bureau to ensure that it develops and implements effective controls for managing its information resources.

The Bureau, by carrying out our recommendations, will be taking critical steps toward establishing an effective IRM program. Should the Bureau falter in its efforts, we recommend that the Secretary direct the Assistant Secretary for Policy, Budget and Administration to establish control mechanisms for overseeing the Bureau's ADP technology resources, information systems development efforts, and information collection activities.

AGENCY COMMENTS AND OUR EVALUATION

The Department of the Interior generally agreed with our recommendations. Interior stated that the recommendations would be useful in improving IRM at the Bureau and at other organizations within the Department. Interior told us that the Bureau either has corrected or is addressing many of the deficiencies and weaknesses noted in the report. In addition, according to Interior, the Bureau has acted on recommendations made by Interior's task force on Bureau ADP management.

Even though Interior agreed with our recommendations, it did not believe that the report described Interior's current approach to implementing IRM. According to Interior, it has sought to strengthen IRM by emphasizing long-range planning, active guidance, technical assistance, monitoring, and evaluation.

We believe that our report does describe the current approach used to implement IRM within the Department. In fact, Interior's description of IRM is identical to ones made by the director of the IRM office in a November 1982 interview and in a November 1983 statement of facts. In both instances, the director asserted that Interior's IRM approach involved long-range planning, guidance, technical assistance, monitoring, and evaluation of Bureau IRM activities.

Interior also said that its approach to improving the Bureau's management of information resources is not inconsistent with the responsibilities laid out in the Paperwork Reduction Act. As discussed on pages 22 through 25 of this report, the Paperwork Reduction Act and OMB Bulletin No. 81-21 envision an agencywide, directive role for agency senior officials. Interior's IRM approach, as described in the Departmental Manual and other internal directives is in compliance with the act's requirements and gives the senior official broad departmentwide operational and advisory functions envisioned by the act. Interior's senior official delegated his responsibilities in this area to the director of the IRM office who believed he was to act only as an advisor to the Bureau. This approach was followed with the Bureau until the Congress began cutting the agency's budget and issuing specific directions for improving the Bureau's IRM program. Then Interior's senior official established an ADP improvement task force to address the Bureau's longstanding IRM problems. The senior official also began working with the Bureau to establish an Office of Data Systems to be responsible for managing the Bureau's information resources. This is the type of direct involvement that Interior should have taken sooner to correct the problems existing in the Bureau and to fulfill the requirements of the act.

Although Interior has not adhered to the Paperwork Reduction Act in implementing IRM throughout the agency, its ongoing actions for improving IRM at the Bureau, when completed, will provide the Bureau a sound foundation for managing information resources. However, we are concerned that Interior may be relying too heavily on the Bureau to make improvements. In our opinion, Interior needs to ensure that the Bureau carries out corrective actions effectively and promptly. One way is for Interior to implement our recommendation calling for the Assistant Secretary for Policy, Budget and Administration to periodically review the Bureau's information resources management activities.

In responding to our recommendations, Interior said that the agency and the Bureau have taken steps to correct longstanding IRM problems. These actions are described below.

IRM manager

On October 24, 1983, Interior established, by Order No. 3098, an Office of Data Systems within the Bureau. Soon after, Interior appointed an acting director to the office and advertised an announcement for a permanent director.

On May 7, 1984, the Bureau issued a delegation of authority, giving the Director, Office of Data Systems, responsibility for managing all the Bureau's ADP equipment, developing automated information systems, and reviewing and recommending approval of any information collection instrument that might affect automated processing. Interior asserted that, by issuing Order No. 3098 and a delegation of authority, it had established unified direction and control over the Bureau's information systems development efforts.

The Secretary's order is a first step toward meeting our concerns. We believe that the order provides a good foundation for establishing unified direction and control over the Bureau's information systems development efforts. As of October 1984, however, the Bureau had not fully implemented the order. According to the acting director of the Office of Data Systems, the Bureau had yet to (1) appoint a permanent director for the office, (2) establish an organizational structure for the office, or (3) begin recruiting and hiring individuals to staff the office.

As a stop-gap measure, Interior has established an ADP improvement task force to carry out the responsibilities assigned to the Office of Data Systems until March 1985. The task force is composed of individuals from various Interior agencies assigned on a temporary basis. In October 1984, we found that events were taking place that limited the task force's ability to carry out its assigned responsibilities.

According to the September 4, 1984, progress report by the task force, the task force has not been able to carry out its assigned responsibilities. Originally the task force had 12 members. As of October 1984, it had been reduced to eight members because some task force members had decided to return to their respective bureaus. Consequently, the eight remaining people were performing the bulk of the work in managing the Bureau's ADP program. The report stated:

"It is critical that the ODS [Office of Data Systems] organization be approved and hiring begun. It is equally critical that continuity be maintained during the transition from Task Force to permanent organization. The best method of assuring continuity is to hire permanent personnel while the Task Force is in place and provide for a transition period."

On October 16, 1984, the acting director of the office stated that the Secretary had extended the task force to March 1985

because of the delays the Bureau was experiencing in getting the Office of Data Systems operational. The acting director also told us that, if the Bureau does not implement the order by the time the task force is scheduled to be disbanded, all gains made in establishing control over the Bureau's information systems development efforts could be lost. Therefore, we believe that, until the Office of Data Systems is fully operational, Interior cannot justly claim that unified direction and control over the Bureau's information systems development efforts have been achieved. Delays in implementing the Secretary's order also affects the Bureau's ability to establish unified direction and control over its ADP equipment resources and forms.

ADP equipment

In our draft report, we proposed that Interior conduct physical inventories of the types and condition of ADP equipment available at all Bureau offices and schools and compile what is available, where it is located, and how it is being used. We pointed out that the inventories should be conducted by qualified, independent parties under the supervision of a Department official who should approve the inventory results. Any discrepancies should be reported, followed up, and resolved.

Interior reported that the Bureau had completed a thorough physical inventory of all ADP equipment on June 30, 1984. According to the acting director of the Office of Data Systems, the inventory was conducted by independent, qualified ADP staff who were assisted by Bureau property management personnel. The results of the inventory are to be reported to Interior's Office of Information Resources Management. All discrepancies are to be reported, followed up, and resolved. The inventory project includes identifying unused and underused equipment and will result in recommendations concerning the feasibility of increasing the use of existing ADP technology to improve services and program management Bureau-wide. As part of this effort, all unneeded equipment will be disposed of. Leased equipment will be returned to the vendor. As of May 23, 1984, the Bureau reported it had returned 24 small leased computer systems, resulting in a fiscal year 1984 cost avoidance of \$151,560 and a fiscal year 1985 cost avoidance of \$363,744. Our work did not entail verifying the Bureau's reported equipment returns.

According to Interior, the Bureau is redesigning its property inventory system and is revising its system software to accommodate design changes. With the new system, the Bureau believes it will be able to effectively inventory, monitor, and control all leased and owned ADP and word processing equipment. In addition, Interior said the Bureau has completely revised and reissued its instructions on performing physical inventories, controlling utilization and disposal, and managing equipment within the Bureau. However, when we checked in October 1984 with the Office of Data Systems'

acting director, we were told that these instructions were awaiting Department approval and, therefore, had not been reissued. According to Interior, when operational, the redesigned property system and manual procedures will fully comply with GAO, OMB, Interior, and Bureau regulations on the inventory and control of ADP resources and will apply to all Bureau headquarters and local field offices.

In addition to these general, overall efforts, the Office of Data Systems is preparing specific ADP policies and procedures governing acquisition, use, and disposal. A moratorium on the acquisition of ADP equipment, software, and related services has been implemented Bureauwide. Future acquisitions must be approved by the Director, Office of Data Systems.

Regarding ADDIX, the entire development effort is being re-directed to ensure that hardware and software are standardized and that applications can be run identically at the Bureau's information management centers. In carrying out the redirection effort, the Bureau will, according to the acting director, Office of Data Systems, take action to implement all our recommendations for improving management control over the development and operation of the ADDIX network.

According to Interior, our recommendation that the Bureau be prohibited from acquiring additional ADP equipment and related software until it demonstrates that it has established effective management controls over these resources should be revised to apply only to major acquisitions, with the understanding that such acquisitions may be authorized after departmental review and approval. Interior said that, under the ADDIX contract, it had prohibited the Bureau from further acquisitions. The largest acquisitions not associated with ADDIX will continue to receive departmental review. We agree that ADP acquisitions may be authorized with departmental review and approval and have clarified our recommendational review accordingly.

We believe that Interior should not limit its oversight to major acquisitions only because (1) the Bureau does not plan to have its Office of Data Systems operational until March 1985; (2) the Bureau has yet to ensure that the office has the necessary authority to carry out its assigned responsibilities, as discussed on page 27; and (3) Interior's ADP task force has not been able to carry out its assigned responsibilities for improving the management of the Bureau's ADP resources. Until the Office of Data Systems becomes operational, the only means the Bureau has for managing its acquisition activities is the task force, which is having difficulty in carrying out its responsibilities. In addition, the task force is scheduled to be disbanded in March 1985. We believe that, until the Office of Data Systems becomes operational and demonstrates it can manage the acquisition of ADP resources, Interior should, through its IRM office, maintain control over all proposed Bureau ADP acquisitions.

Information systems

Interior said the Director, Office of Data Systems, will review ongoing information systems development efforts for duplication. Where systems duplication or unnecessary data collection requirements exist, the Office of Data Systems will consult with the affected program or administrative functional manager to combine duplicative data collection efforts and to eliminate unnecessary systems.

The Bureau plans to appoint an information systems analyst who, in coordination with the Director, Office of Data Systems, will inventory and review operational information systems, as required by the Paperwork Reduction Act. The initial effort is scheduled for completion by the end of fiscal year 1985, and inventory maintenance and review will continue as a permanent, ongoing effort thereafter.

The information systems analyst also will be responsible for coordinating the forms development and review functions of the branch of directives and regulatory reform with the Office of Data Systems. In addition, the analyst will be responsible for inventorying existing data collection forms and for keeping the inventory up-to-date. Forms will be submitted through the Department to OMB for approval. The analyst's activities will be closely coordinated with the Office of Data Systems.

Regarding the Indian education information system, the Office of Indian Education Programs has appointed a permanent manager to oversee development of the system. This office, in coordination with the Office of Data Systems, has determined that a contractor should help develop software for the system. A contract has been awarded to the Minnesota Education Consortium Company for this purpose. A student enrollment system is being developed and is to be implemented at each education information data processing site.

Forms management

Interior asserted that, during the fiscal years 1983 and 1984 information collection budget hearings at OMB, OMB had conveyed to the Bureau the consequences of using forms that do not display OMB approval numbers. Apparently, this approach was not effective because, on May 9, 1984, the Deputy Assistant Secretary for Policy, Budget and Administration again had to notify the Assistant Secretary for Indian Affairs of the consequences of not complying with OMB approval requirements.

The Bureau said it will reemphasize its existing procedure governing forms control in a memorandum to all office directors. On October 22, 1984, we checked with Interior's ADP improvement task force to determine if a memorandum had been issued to all directors. We were told that this action had not yet been completed. The Bureau also said it will require all offices to

submit documentation to the division of management research and evaluation of forms distribution. We believe that, rather than relying on the Bureau to do this, the Assistant Secretary for Policy, Budget and Administration, who is responsible for implementing the Paperwork Reduction Act, should directly alert Bureau program officials at the headquarters and local office levels to the consequences of using forms that do not display OMB approval numbers.

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Interior did not address our recommendation directed at establishing a mechanism for monitoring program office use of approved forms. Interior also did not describe how it would ensure that future major ADP equipment acquisitions and systems development efforts are overseen by permanent, full-time project managers with clearly established responsibilities.

Interior said it concurred with our recommendations calling for the Assistant Secretary for Policy, Budget and Administration to (1) review, on a cyclical basis, Bureau IRM activities providing broad audit coverage, particularly of the ADP equipment, systems development, and forms management areas and (2) work with the Bureau to ensure that it develops and implements effective controls for managing its information resources. In its written comments, however, Interior did not provide us with detailed information on its plans for implementing these two recommendations.

On August 3, 1984, Interior's IRM and Inspector General's Offices, advised us that, in responding to this report, they plan to conduct five reviews of Bureau IRM activities in fiscal year 1985. The planned reviews should provide broad audit coverage of the Bureau's ADP equipment, systems development, and forms management activities. The results of the audits should provide the Assistant Secretary for Policy, Budget and Administration the necessary feedback to assess Department efforts to ensure the Bureau develops and implements effective controls for managing information resources.

In our draft report, we proposed that, until Interior and the Bureau demonstrated that information resources management had improved at all levels in the Bureau, the Congress continue to limit the amount of ADP equipment and information resources being acquired by the Bureau. The Congress agreed with our proposal and placed funding limitations on the Bureau's acquisition of additional ADP equipment and information systems for fiscal years 1984 and 1985. The Congress is considering extending the limitation for fiscal year 1986.

PAST GAO REPORTS ON INFORMATION RESOURCESMANAGEMENT AT THE BUREAU OF INDIAN AFFAIRS

Our major reports related to information management at the Bureau of Indian Affairs are listed below.

- Major Improvements Needed in the Bureau of Indian Affairs' Accounting System (GAO/AFMD-82-71, Sept. 8, 1982).
- Congressional Monitoring of Planning for Indian Health Care Facilities Is Still Needed (GAO/HRD-80-28, Apr. 16, 1980).
- Alternatives for the Bureau of Indian Affairs Public School Financial Assistance Program (GAO/CED-79-112 Sept. 6, 1979).
- Oil and Gas Royalty Collections--Serious Financial Management Problems Need Congressional Attention (GAO/FGMSD-79-24, Apr. 13, 1979).
- Federal Management Weaknesses Cry Out for Alternatives to Deliver Programs and Services to Indians to Improve Their Quality of Life (GAO/CED-78-166, Oct. 31, 1978).
- Controls Are Needed Over Indian Self-Determination Contracts, Grants, and Training and Technical Assistance Activities to Insure Required Services Are Provided to Indians (GAO/CED-78-44, Feb. 15, 1978).
- More Effective Controls Over Bureau of Indian Affairs Administrative Costs Are Needed (GAO/FGMSD-78-17, Feb. 15, 1978).
- Bureau of Indian Affairs Not Operating Boarding Schools Efficiently (GAO/CED-78-56, Feb. 15, 1978).
- The Bureau of Indian Affairs Needs to Determine How Well Its Indian Training Program is Working and Assist Tribes in Their Training Efforts (GAO/CED-78-46, Feb. 13, 1978).



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

MAY 23 1984

Mr. J. Dexter Peach
Director, Resources, Community and
Economic Development Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Peach:

The Department of the Interior offers the following general comments in response to the draft report to the Congress entitled **IMPROVED MANAGEMENT OF INFORMATION RESOURCES AT THE BUREAU OF INDIAN AFFAIRS COULD REDUCE WASTE AND IMPROVE PRODUCTIVITY**. Enclosed are specific comments to the text of this report.

We generally agree with the recommendations to the Secretary. However, we do not feel that the draft GAO report describes the current climate in which information resources management (IRM) is implemented within the Department. The Department has sought to strengthen IRM in the Bureau of Indian Affairs (BIA) by emphasizing long-range planning, active guidance, technical assistance, monitoring and evaluation. During the past year, recommendations of the 1983 Department Task Force on BIA ADP Management have been acted on by the BIA providing a sound foundation for directing future ADP efforts. Also, many of the deficiencies and weaknesses noted in the draft GAO report have either been corrected or have been incorporated in the improvements undertaken by the BIA. Overall, we feel the Department's IRM approach is not inconsistent with the responsibilities laid out in the Paperwork Reduction Act, as implied by the draft GAO report.

GAO's recommendations will be useful in improving the management of information resources in BIA and other organizations of the Department. We are satisfied that the recommendations provide support for certain significant actions we have initiated. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert M. Wright".

Deputy Assistant Secretary
Policy, Budget and Administration

RMW:lcw/rrp

RESPONSE TO GAO DRAFT REPORT

IMPROVED MANAGEMENT OF INFORMATION RESOURCES
AT THE BUREAU OF INDIAN AFFAIRS COULD REDUCE
WASTE AND IMPROVE PRODUCTIVITYRecommendation:

Require the Assistant Secretary for Indian Affairs to appoint a senior Bureau official to serve as the Bureau's IRM manager. This person, who should report to the Assistant Secretary or the Deputy Assistant Secretary for Indian Affairs, should be responsible and accountable for managing all the Bureau's ADP equipment, information systems development, and forms. The Bureau should reassign, hire, or otherwise appoint thoroughly competent professionals to assist this manager in carrying out the assigned responsibilities.

Response:

On October 24, 1983, the Office of Data Systems reporting to the Deputy Assistant Secretary - Indian Affairs (Operations) was established by Secretary's Order No. 3098 (copy attached). Immediately following that action an Acting Director of the Office was appointed and the Director's position was advertised to seek a permanent employee. The Director, Office of Data Systems will be responsible for managing all the Bureau's ADP equipment, automated information systems development, and for reviewing and recommending approval of any information collection instrument, form, format or requirement which may result in or impact on automated information data processing.

A Bureau of Indian Affairs - Manual Bulletin delegating the authority to execute the above responsibility to the Director, Office of Data Systems and removing such authority from all the Bureau officials was issued on May 7, 1984. (Copy Attached)

Upon the appointment of an Acting Director, Office of Data Systems, a staff of qualified ADP professionals were assigned to ODS to assist in carrying out its responsibilities.

Recommendation:

Require the Assistant Secretary for Indian Affairs to establish better controls over ADP equipment, systems development efforts, and paperwork management activities by doing the following:

- (1) Conducting physical inventories of the types and condition of ADP equipment available at all Bureau offices and schools and compile what is available, where it is located, and how it is being used. The inventories should be conducted by qualified, independent parties under the supervision of a Department official who should approve the inventory results. Any discrepancies should be reported, followed up, and resolved.

Response:

A complete physical inventory of all ADP equipment was commenced and will be completed by June 30, 1984. The inventory is being conducted by qualified ADP staff who are being assisted by Bureau Property Management personnel. The results of the inventory will be reported to the Department's Office of Information Research Management. All discrepancies will be reported, followed up, and resolved.

Recommendation:

- (2) Adopting procedures for (a) effectively monitoring the Bureau's ADP equipment inventory, such as taking periodic physical inventories, to provide a check on Bureau property controls and procedures as well as to test the extent to which ADP equipment continues to go unused; and (b) ensuring that local offices comply with GAO, OMB, Department, and Bureau regulations on the inventory and control of ADP resources.

Response:

The Bureau has recently redesigned its property inventory system and is in the process of revising its system software to accommodate design changes. The new system design includes the capability to effectively inventory, monitor, and control all leased, owned, or otherwise held BIA ADP and word processing equipment as well as all other capitalized equipment. In addition, the Bureau has completely revised and reissued its Bureau manual part which sets forth procedures for performing physical inventories, controlling utilization and disposal, and otherwise managing equipment within the Bureau.

The redesigned property system and manual procedures are in full compliance with GAO, OMB, Departmental, and Bureau regulations on the inventory and control of ADP resources and are applicable to all BIA and OIEP headquarters and local field offices. In addition to these general, overall efforts, ODS is preparing specific ADP policies and procedures governing acquisition, utilization (including sharing of equipment resources), and disposal.

Recommendation:

- (3) Identifying unused and underused ADP equipment and evaluating the feasibility of increasing the use of this available ADP technology to improve Bureauwide service and program management, beginning with the minerals management, individual Indian money, and education programs. The Bureau should dispose of any ADP equipment that cannot be adapted to the Bureau's missions and return any unneeded leased equipment to the vendor.

Response:

The current inventory project includes identification of unused and underused equipment and will result in recommendations concerning the feasibility of increasing the use of existing ADP technology to improve Bureauwide services and program management. Unneeded equipment disposal actions including return of unneeded leased equipment to vendors will also result from the effort. Additionally, it is important to note that recent ODS efforts resulted in the return of 24 B94 systems (leased equipment items) resulting in an FY 1984 cost avoidance of \$151,560 and an FY 1985 cost avoidance of \$363,744.

Recommendation:

- (4) Continuing to prohibit the delivery of additional equipment for AADIX until the following has been done:
 - (a) User and management requirements are defined and decisions are made on where and when processing for different types of data will be done.
 - (b) Software is developed or converted.
 - (c) Site development tasks are completed.
 - (d) An effective hiring and training plan is established.
 - (e) Clarify the AADIX manager's duties, responsibilities, and authority in the following areas: providing day-to-day supervision of the acquisition, installation, and use of equipment; coordinating development activities; following applicable government regulations and standards; settling disputes and conflicts; adjusting project schedules; and ensuring that resources requirements are met.
 - (f) Ensure that the AADIX project manager's resources are sufficient to permit visits to local offices to monitor the delivery, installation, and use of AADIX equipment.

Response:

A total moratorium on the acquisition of ADP equipment, software, and related services has been implemented Bureauwide. Any future such acquisitions must be approved by the Director, Office of Data Systems. With regard to AADIX, the entire systems development effort is being redirected to ensure that hardware and software are standardized and that applications can be run identically at the Bureau's Information Management Centers.

Recommendation:

- (5) Reviewing ongoing information systems development efforts and continuing only those efforts that are necessary to fulfill Bureau missions and that do not duplicate existing systems.

Response:

This is being accomplished by the Office of Data Systems through the exercise of the authorities delegated to the Director. Where systems duplication or unnecessary data collection requirements exist, the affected program or administrative functional manager will be consulted and duplicative data collection efforts will be combined and unnecessary system will be eliminated.

Recommendation:

- (6) Inventorying the Bureau's information systems, as required by the Paperwork Reduction Act, and identifying duplicate and overlapping systems. Any duplicate and overlapping systems should be evaluated for consolidation or elimination.

Response:

The Bureau's Management Research & Evaluation Division will establish an information collection analyst position which will coordinate with ODS to inventory and review information system as required by the Paperwork Reduction Act. Any duplicate or overlapping systems will be evaluated for consolidation or elimination. The initial effort is scheduled for completion by the end of FY 1985, and inventory maintenance and review will continue as a permanent, ongoing effort thereafter.

Recommendation:

- (7) Establishing unified direction and control over the Bureau's information systems development efforts. Authority to develop systems should be withdrawn from the various offices and vested in the Bureau's IRM manager, who should also be given authority to control the funds for such development.

Response:

This has been accomplished through the issuance of the attached Secretary's Order and Delegation of Authority referenced earlier.

Recommendation:

- (8) Ensuring that ongoing and future major ADP equipment acquisitions and systems development efforts are overseen by permanent, fulltime project managers whose duties, responsibilities, and authority are clearly established. In particular, the Bureau should, as soon as practicable, appoint a permanent project manager for the Indian Education Information System.

Response:

Again, refer to the attached Secretary's Order and Delegation of Authority. In addition, the OIEP has already appointed a permanent manager of the Indian Education Information System. This manager is fully cognizant of OIEP's requirements and has worked closely with the Director and staff of ODS since their appointment in November of 1983.

Recommendation:

- (9) Appointing a staff with a high level of data processing expertise, especially in the area of software development, to assist the education system project director.

Response:

The OIEP in coordinating with ODS, has determined that software for the Indian Education systems project should be developed through contract assistance. A current contract is in effect with the Minnesota Education Consortium Company for this effort. The Student Enrollment Systems is in production and will be implemented at each ADP site.

Recommendation:

- (10) Inventorying the forms used by Bureau offices to collect information from the public. Identify any forms that are needed in the operation of Bureau programs but have not yet been approved by OMB and submit these forms through the departmental IRM office to OMB for approval.

Response:

The information system analyst position to be established in the Division of Management Research and Evaluation will, in addition to the duties described earlier, have responsibility for inventorying existing data collection forms and for maintaining that inventory in an up-to-date manner. Any forms that are needed but which have not yet been approved by the OMB will be submitted through the Department to the OMB for approval. The activities of this position will be closely coordinated with ODS.

Recommendation:

- (11) Directing the Bureau's program offices to coordinate their forms management activities through the Paperwork Management Branch. The offices should provide timely information to the Branch on the printing, distribution, and use of OMB-approved forms.

Response:

The existing BIAM procedure governing forms control will be reemphasized through a memorandum to all office directors. We will also require all offices to submit documentation to the Division of Management Research and Evaluation of their distribution.

Recommendation:

- (12) Making the Bureau's Paperwork Management Branch accountable to the Bureau IRM manager for ensuring that OMB-approved forms are distributed and used.

Response:

As mentioned in the response to previous recommendation, the information systems analyst position will be responsible for coordinating the forms development and review functions of the Branch of Directives and Regulatory Reform with the ODS.

Recommendation:

Direct the Assistant Secretary for Policy, Budget and Administration, Interior's designated IRM official under the Paperwork Reduction Act, to do the following to preclude a recurrence of the types of longstanding management problems described in this report:

- (1) Prohibit the Bureau from acquiring any additional ADP equipment and computer software until it demonstrates that it has established effective management controls over these resources.

Response:

This recommendation should be revised to apply only to major acquisitions, with the understanding that such acquisitions may be authorized after Departmental review and approval. In effect, the Bureau has been prohibited from further acquisitions under the AADIX contract by Departmental actions taken from September 23 through November 10, 1983. The largest acquisitions not associated with the AADIX will continue to receive Department review.

Recommendation:

- (2) Alert Bureau program and local offices to the potential consequences of using forms that do not display currently valid control numbers, and require that the Bureau take appropriate steps to get OMB approval on needed but currently unapproved forms.

Response:

The consequences of using forms that do not display OMB approval numbers have been conveyed to BIA officials during FY 1983 and FY 1984 Information Collection Budget hearings at OMB. In conjunction with those communications, the most recent communication to BIA in this regard is attached.

Recommendation:

- (3) Review, on a cyclical basis, the information resources management activities of the Bureau, providing broad audit coverage, particularly of the ADP equipment, system development, and forms management areas.

Response:

We concur.

Recommendation:

- (4) Work with the Bureau to ensure that it develops and implements effective controls for managing its information resources.

Response:

We concur.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

AUG 11 1954

Memorandum

To: Assistant Secretary - Indian Affairs

From: Deputy Assistant Secretary - Policy, Budget and Administration

Subject: BIA Compliance with the Paperwork Reduction Act

I have recently received the attached copy of a letter sent by the Chief of the Regulatory Policy Branch at the Office of Management and Budget. This letter provides a good occasion to review the Bureau's compliance with the clearance provisions of the Paperwork Reduction Act.

Much progress has been made by Bureau employees in identifying uncleared information collections. There are, however, as the attached letter indicates, serious problems with the quality of clearance packages submitted to OMB and with adherence to schedules for clearance. Our feeling in this Office is that these problems result in large part from failure of a single official to retain responsibility for all aspects - technical as well as policy - of the information collection budget and the clearance process. Our experience has been that different officials at different levels of responsibility represent the bureau at almost every meeting connected with this program. While we hope the bureau will continue to send top level officials to meetings relating to information collection, we feel it is extremely important that there also be a single official who attends all meetings and works with your program officials as necessary to explain the requirements of the clearance process and review completed work for adherence to OMB standards. This procedure has worked well for other bureaus.

Appointment of a single official and alternate to serve as clearance officer for the bureau will be only the first step towards meeting OMB's concerns. Ensuring responsiveness of bureau program officials to your clearance officer's requests will also be necessary. In the past, failure of program officials to supply information by scheduled deadlines has been a prime cause of the bureau's failure to meet OMB deadlines. If the one month deadline mentioned in the letter is to be met, the timely cooperation of program officials is essential. This should be emphasized in the strongest possible terms.

As the Office of Management and Budget continues to press the Department for results in this and related areas of paperwork reduction, I request you to submit by June 22 a revised response to my February 7 memo. The revised response should, as discussed at the March 20 meeting, be accompanied by specific evidence of program changes, e.g., copies of old and new forms, copies of old and revised directives or regulations, etc. You may wish to suggest to those preparing the response to review the definition of program change found in 381 DM 11.

In order bring the bureau into compliance with other OMB requirements in this area, renewals should be submitted by June 22 for each of the nine expired clearances on the list attached to this memorandum. These renewals should meet the criteria contained in the Department's Information Collection Handbook. I would also like by June 22 to receive a memorandum clarifying the status of 25 CFR Subchapter J (OMB number 1076-0023) and Subchapter L (OMB number 1076-0024). These two subchapters are listed in the attachment to OMB's letter of January 11, 1984 as not requiring submission to OMB, yet the attachment to your letter of May 2 indicated that these subchapters contain information collections requiring submission.

It is important to recall that the Paperwork Reduction Act and 5 CFR 1320 required that all information collections have up-to-date clearances by December 31, 1983. Technically, no information collection should be in use which does not now have a valid clearance. It is also important to note that the Assistant Secretary - Indian Affairs committed the bureau in the FY 1984 information collection budget to large decreases in the burden placed on the public by collection of information. Failure to meet these requirements and commitments will place the bureau and the Department at a definite disadvantage at the FY 1985 information collection budget hearings. Your personal attention to this situation will be appreciated.

Oscar W. Mueller, Jr.

Oscar W. Mueller, Jr.

Attachment

PIR:Strylowski:pjd:5/8/84:d1-brdn/mem:x6191

PIR:Dir RF

PIR:DRD Chron

PIR:Strylowski



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

MAY 18 1984

Memorandum

To: Director, Office of Administration, BIA
From: Director, Office of Information Resources Management
Subject: Response to February 7 Memorandum on Burden Reduction

The material transmitted by your May 2, 1984 memorandum cannot satisfy our February 7 request for details of reductions in information collections made by the bureau. The material transmitted was specifically rejected as inadequate by the Office of Management and Budget at a meeting held there on March 20, 1984, at which the bureau was represented by Orville Hood and Glenn Miller.

To satisfy the requirement for reductions in burden and to comply with information collection burden levels mandated by OMB, the bureau must submit evidence of program changes which have been made to actually reduce the amount of information collected from the public. The attachment submitted with your memo does not, as OMB pointed out, do this. The attachment has these specific defects:

1. The attachment calculates reductions from hours in use as of February 1984. OMB expects deductions to be calculated from the September 1983 base, which, as approved by OMB, is 3,788,605.

2. Hours associated with information collections which OMB has decided not to review (referred to in the attachment as "exemptions") are not considered to be reductions.

3. Hours contained in the column labeled "less BIA actions" are only allowable to the extent that they represent demonstrable program changes. Of the thousands of hours listed in this column, only the 9,422 hours connected with the Bowhead Whale have been shown to be a program change, since the survey has been eliminated.

The above points were covered in detail at the March 20 meeting at OMB.

Once the bureau has appointed a clearance officer and alternate, the Office of Information Resources Management will work with them as necessary to explain OMB procedures and standards. I feel certain that a combination of greater expertise within the bureau and increased compliance by program officials will enable you to meet OMB's deadlines and criteria.

(Signed) Joseph E. Doddridge, Jr.

Joseph E. Doddridge Jr.

Attachment

PIR:Strylowski:pjd:5/1/84:dl-bia-pra

PIR:Dir RF

~~PIR:DRD Chronm~~

PIR:Strylowski



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ORDER NO. 3098

Subject: Establishment of the Office of Data Systems,
Bureau of Indian Affairs

Section 1. Purpose. This order provides for the establishment of the Office of Data Systems within the Bureau of Indian Affairs (BIA): the transfer of all functions relating to bureau-wide management of automatic data processing (ADP) and data-communications services and resources from the Office of Administration to the Office of Data Systems; and the abolishment of the Administrative Service Center (ASC) within the Office of Administration. The purpose of this action is to strengthen and improve data resource management, ADP technical management, services and supervision, and promote more effective utilization of ADP and data-communications resources supporting BIA's programs throughout the Nation.

Section 2. Authority. This Order is issued in accordance with the authority provided by Section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262).

Section 3. Establishment of Office and Transfer of Functions.

a. The Office of Data Systems is hereby established in the Bureau of Indian Affairs. The Office is to be headed by a Director who will serve as ADP manager as described in 306 DM 4.3 and report to the Head of the Bureau.

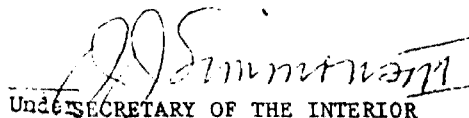
b. ASC is abolished and its functions relating to ADP and data communications are transferred to the Office of Data Systems. All other functions in the abolished ASC are transferred to the Albuquerque Area Office except for the Branch of Fedstrip and Inventory Services. The Branch of Fedstrip and Inventory Services is to remain in the Office of Administration and shall report to the Division of Property Management.

c. This Order does not include the transfer of ADP systems or the reassignment of BIA staff affiliated with the ADP systems presently operated by the Offices of Trust Responsibilities, Indian Services, Indian Education Programs, Administration (excluding ASC); Facilities Engineering or School Facilities staffs; or the Bureau's field offices.

Section 4. Responsibilities of the Office of Data Systems. The Office of Data Systems shall have the responsibility for establishing, implementing and reviewing bureau-wide policies, plans and processes related to ADP and data-communications systems. This responsibility shall encompass all aspects of ADP and data-communications management bureau-wide including the acquisition, utilization and disposal of all data, software, hardware and services. The Office shall have responsibility to review and recommend approval or disapproval of the acquisition, use, modification or discontinuance of any ADP or data-communications service or resource that may be requested by any program directorate or any of the Bureau's field offices. Further, the Office of Data Systems shall have the responsibility of continuing to operate the centralized ADP systems now located at the Administrative Services Center.

Section 5. Administrative Provisions. The Assistant Secretary - Indian Affairs shall take appropriate action to effect the transfer of personnel, funds, and property to implement the provisions of this Order as well as assure that this transfer is appropriately documented in the Departmental Manual in accordance with the provisions of Section 6 of this Order.

Section 6. Effective Date. This Order is effective immediately. Detailed organization statements reflecting this Order will be published in the Departmental Manual prior to the expiration of this Order. This Order shall terminate and be considered obsolete on September 30, 1984.


Under SECRETARY OF THE INTERIOR

DATE: OCT 24 1983



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

WASHINGTON, D.C. 20245

Memorandum

To: Holders of 10 BIAM

From: Deputy Assistant Secretary - Indian Affairs (Operations)

Subject: Delegation of Authority to Director, Office of Data Systems

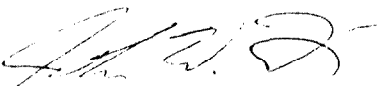
On October 24, 1983, the Under Secretary signed Secretary's Order No. 3098 thereby establishing the Office of Data Systems in the Bureau of Indian Affairs. That Order delineated the responsibilities of the Office, and the purpose of this delegation of authority is to ensure that the Director, Office of Data Systems has sufficient authority to fully execute those responsibilities.

The Director, Office of Data Systems is authorized to exercise the authority delegated to the Deputy Assistant Secretary - Indian Affairs (Operations) in 209 DM 8 pertaining to information resources management. This authority includes, but is not limited to:

- approval of the acquisition, utilization and disposal of all data, software, hardware and services associated with the Bureau's ADP activity;
- review of and approval for the acquisition, use, modification or discontinuance of any ADP or data-communications service or resource that may be requested by any program directorate or any of the Bureau's field offices;
- review and recommend approval or disapproval to the Director, Office of Administration of any information collection instrument, form, format, or requirement which may result in or impact on automated data input or processing;
- review and recommend approval or disapproval of requests for organizational modifications that directly involve, impact upon, or affect information resources staff within any program directorate or any of the Bureau's field offices; and

- review and recommend approval or disapproval of ADP systems related budgetary requests and resource allocation plans prepared by any program directorate or any of the Bureau's field offices.

Any authority pertaining to the responsibilities assigned to the Director, Office of Data Systems by Secretary's Order No. 3098, whether specified or implied, previously delegated to another Central Office Director or Area Director is hereby rescinded.



Deputy Assistant Secretary - Indian
Affairs (Operations)

Filing Reference: 10 BIAM

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