

**Consultation: Indian Land Title and Records Proposed Rule
January 14, 2021
1:00 pm CT**

Coordinator: Welcome and thank you for standing by. At this time all participants are in a listen-only mode until the question-and-answer session of today's call. At that time if you would like to ask a question, you may press star 1. Today's conference is also being recorded. If you have any objections, you may disconnect at this time. I would now like to turn the meeting over to Ms. Elizabeth Appel. You may begin.

Elizabeth Appel: Good afternoon everybody. My name's Liz Appel. I'm with the Office of Regulatory Affairs and Collaborative Action. And I'd like to turn it over to Johnna Blackhair, our Deputy Director for Trust Services with the BIA, to welcome everyone.

Johnna Blackhair: Good afternoon. Thank you Liz. Welcome to our consultation for the modernization of our land titles and records office and the transactions that are handled through our Division of Land, Titles and Records in our offices throughout the 12 regions.

Today we have with us the Solicitor's Office and the Division of Land, Titles and Records, Ms. (Debbie Cobrik) and Mr. Rick Zephier.

Elizabeth Appel: Great. Thank you Johnna. So what we'll be doing today - I'll give an overview of the regulation and then we'll walk through each of the subparts. And then we'll open it up for questions and comments. So I will be - if you'd like to follow along there is a PowerPoint presentation in PDF form that's available on the Web. And I will direct you where to find it. So if you can just bear with me for a few minutes.

If you're in front of your computer and you go to BIA.gov that takes you to the main BIA page. And then in the upper right - I'm sorry, left hand corner there is a tab, About Us. And if you click on that tab and go to the first link in that tab, that's Assistant Secretary-Indian Affairs. And you click on that. That should take you to the Assistant Secretary-Indian Affairs main page.

And on that page you'll see on the left hand side, a list of offices, each of which has a link. And if you go towards the bottom, the third up from the bottom is Regulatory Affairs and Collaborative Action. If you click that Regulatory Affairs and Collaborative Action, that brings you to the main Office of Regulatory Affairs and Collaborative Action or RACA page.

And in that left hand list of links again, the third item down is something called Regulations and Other Documents in Development. If you click on that, that will take you to a page where the third bullet down is Indian Land Title and Records. And the first bullet under that title is the presentation to follow along.

And the alternative if you want to try and type the address directly into your address bar; this is a long address so again, please bear with me for a minute. It's www.BIA.gov/AS-IA/RACA/Regulations-And-Other-Documents-In-Development. And that again, will take you to the regulations page where

you can find the bullet for Indian Land, Title and Records, and the sub bullet with the presentation.

And if you've had trouble following that and would like a copy of the presentation, please feel free to email me either at Consultation@BIA.gov or at Elizabeth.Appel@BIA.gov. So to get some background on the proposed rule that we'll be discussing today, we'll be referring to Indian land.

And what we're referring to when we say Indian land, is land that the United States holds in trust or restricted status for individual Indians and tribes. And when we talk about title documents for Indian land we're talking about title documents for conveyances, probate orders, encumbrances like mortgages, liens, leases, rights of way, etc.; plats, cadastral surveys and other surveys.

The Bureau of Indian Affairs Land, Title and Records Office or LTRO, maintains title documents for Indian land. The LTRO has several physical offices across the United States. In 1965 they were established as title plants to serve BIA, what was then called area offices. Each LTRO office is assigned a geographic area based on either the BIA region or tribal reservation, and that LTRO office records title documents primarily within that designated geographic area.

The current regulations governing Indian land, title and records in the LTRO are found at 25 CFR Part 150. Those regulations were put in place in 1981 and haven't been updated since that time, in 40 years. So as a result, the LTRO location, specific locations that are listed out in Part 150, are no longer accurate. Additionally, LTRO operates a lot different now. It maintains its title documents primarily through an electronic system rather than solely through hard copy.

That electronic system is known as the Trust Asset Accounting Management System or TAAMS. And then another major development in the past 40 years that aren't - is not reflected in the current regulations, is that there's now new categories of documents that don't require secretarial approval but they still need to be recorded in the LTRO because they affect who's authorized to use Indian land.

And an example of a document that falls in that category is a lease under a tribe's approved HEARTH regulations. So the proposed rule - our approach in revising these regulations is in the proposed rule basically to modernize the regulation. So rather than referring in the regulatory text, to the physical locations of each LTRO office, we instead refer to BIA's Web site where we will keep the LTRO office locations listed and updated so that at any given time that list is accurate.

The proposed rule would also address LTRO's electronic maintenance of title documents through TAAMS and address recordation of those new categories of documents that I just referred to. Additionally, the proposed rule would clarify the LTRO's role is a support office for BIA realty staff, for land transactions that are requested by Indian landowners. And as a support office for the Office of Hearings and Appeals, or OHA, for title matters related to probate.

The proposed rule would also clarify LTRO's role with respect to title defects. So how it handles title defects in the course of its operation. And it would allow the BIA director to delegate recording responsibilities to another office for certain transactions on an as needed basis, and allocate workloads among the LTRO offices, for efficiency.

There are five subparts in the proposed rule and we'll walk through each of those briefly. Subpart A is the sort of overview purpose and definitions; Subpart B addresses the record of title to Indian lands; Subpart C addresses procedures and requirements to record documents; Subpart D talks about when the information, the title documents that - in the Record of Title, may be disclosed and to whom; and then the last subpart, Subpart E, discusses records.

So to begin with, Subpart A describes what the record of title is and that is BIA's repository of title documents for Indian lands. This part also describes the responsibilities for LTRO to record title documents, maintain the record of title, and provide report on title to Indian lands.

And if you're following along in the presentation that was slide 7. And you'll see in the lower right hand corner, the section number of the proposed rule that addresses the content on each slide. So slide 8 or Section 150.2, the proposed rule adds new definitions for several items that - for clarity. So for example, there are now definitions for certified, certified copy, and certifying officer, because those are terms that are used pretty commonly in the title - the LTRO world. so that is to help clarify.

And defect or title defect is also defined. IRU is defined just for plain language purposes. And then Office of Hearings and Appeals, OHA, and probate inventory report, are defined as are record of title, region, and the integral term, title.

Additionally, several definitions would be clarified through the proposed rule, so the definition of agency would be revised to clarify that contracting and compacting tribes are included in that term. Indian land would be revised to limit it to just trust or restricted land. There are, in the current definition of

Indian land, additional categories included in the scope of that definition, but as we'll talk about later, those categories are now moved to a new section of the regulation.

The definition of recording was revised to remove a substantive statement as to the significance of recording. Title document was revised to provide some examples. Title examination was revised to (provide) detail. And then tribe was revised to refer to the List Act of 1994. The proposed rule also deletes some definitions for terms that are no longer used. So Administrative Law Judge, Commissioner, Land, and Superintendent would all be deleted under the proposed rule.

That is Subpart A. And then Subpart B, record of title to Indian lands, provides a new section that describes the purpose of the record of title. And the purpose is twofold for - to provide BIA with a record of title to Indian land. And then second, to provide the public with constructive notice that those title documents exist. So particularly for future purchasers, creditors, or other interested parties.

And then Subpart B includes - carries forward a current section on the fact that LTRO maintains the record of title with no change to that section. Subpart B then lists the services that LTRO provides to maintain record of title.

And those include recording title documents that are submitted by an agency, region or OHA; providing certified copies of title documents that are in the record of title; examining the record of title and certifying findings of title examinations; providing and certifying title status reports or TSRs; preparing, maintaining, and providing land status maps; providing and certifying probate

inventory reports; and providing other services and reports based upon the information in the record of title.

Then Sections 104 and - I'm sorry, 150.104 and 150.105 provide that LTROs generally maintain the record of title electronically. So that is a new section. And it provides that each LTRO office has primary responsibility to maintain the record of title under its assigned geographic area. And that BIA is going to keep a list of what those assigned areas are, on the Web site.

So this is where it's taking what's currently just a list of physical addresses of LTRO office and instead moving it to the Web site where it can be kept more current, as well as the areas of responsibility of each of those offices. And then another new provision in the proposed rule is that the LTRO offices may assist in maintaining the record of title or other geographic areas as needed. So it provides the BIA director some flexibility in reassigning workloads to avoid backlog.

In proposed section 150.201 discusses what's recorded in the record of title and provides a mandatory provision that all title documents for Indian lands must be recorded. So all title documents for Indian land being land that the US holds in trust or restricted status for tribes or individuals, have to be recorded in the record of title.

And the proposed rule then addresses the new categories of documents that don't require secretarial approval. So the proposed rule says that even if the document reflects a transaction that didn't require secretarial approval, if it affects Indian land then it must be recorded in the LTRO. And it - the proposed rule lists as examples of those documents, the HEARTH leases that we referred to earlier, service line agreement which are no longer required to

be approved by the secretary, leases of tribal land by a 477 corporate entity under a charter, and sub leasehold mortgages.

And then proposed 150.201 provides the LTRO may also record certain other documents. So these are the categories of documents that used to be or are currently in the current Part 150, included in the definition of Indian land. The proposed rule moves them out of definition of Indian land so the Indian land refers exclusively to trust or restricted lands and is mandatory to be recorded in the LTRO.

And now these other documents are documents that may be - the LTRO may in their discretion, record in the LTRO, but do not have to be recorded in the LTRO. So those documents include documents that demonstrate rights of use, occupancy, and/or benefit of certain tribes to US government lands or other non-Indian lands, and certain documents regarding Indian lands that are not title documents.

The proposed rule provides some information on how to find documents for Indian land, title documents for Indian land. So first, individual entities are instructed to check the LTRO and then in certain circumstances, also check federal, state and local records of title. And the requirement to record with LTRO does not eliminate or supersede any federal law that requires recording in other records of title. So for example, title documents for Indian land within the jurisdiction of the Osage Nation or other Oklahoma tribes that - those federal statutes and regulations requiring recording in the county records, for example, would still apply.

Subpart C continues on to discuss the mechanics of recording and that only an agency region, or OHA may submit title documents to an LTRO for recording. So the landowner's main points of contact are the agency or region

and they serve the agency or region. OHA serves as the liaison to the LTRO for recording documents. LTRO is the designated office to record title documents, but the BIA director can delegate authority to another office by documenting the types of transactions that the delegation applies to.

So this is intended to provide flexibility if an occasion arises where the BIA director needs to delegate authority just for a limited purpose, to another office. And Subpart C discusses the minimum requirements for recording. So in order to be recorded, the title document must include a title - I'm sorry, a legal description and if required, the tract number, signature of the parties to the document, proper notarization of signatures if that applies, and then signature and citation to authority of the approving official for the transaction, and the approval date of the transaction.

If the transaction was deemed approved, then the minimum requirement for recording only includes the legal description, signature of parties to the document, and proper notarization if applicable, because there would be no approving authority - approving official signature. And then proposed Section 150.206 discusses what the LTRO does if there are errors in the document to be recorded.

So this discusses title defects. And if the LTRO discovers that one or more of those minimum requirements for recording, is missing, then the proposed rule provides the LTRO will notify the originating office and request a correction before recording.

If the LTRO discovers one or more of the minimum requirements has an error, so all the requirements are present but there is an error, then the LTRO is going to record the title document but record it with a notation on title and then notify the originating office to request a correction. Once the originating

office corrects the error that's on the document then LTRO will remove the notation.

If LTRO discovers during a title examination, that a previously recorded title document contains - or creates a title defect, then LTRO will similarly, record the title document with a notation on title and notify the originating office, to request a correction. And then upon correction, remove the notation. If the defect is in a probate record then the LTRO will notify the agency or region, to initiate corrective action with OHA.

So that is Subpart C, recording document. Subpart D, disclosure of title documents and reports, discusses how LTRO certifies copies and that is by affixing an official seal on the copy that shows that the copy is a true and correct copy of the recorded title document. This subpart also lists what report - types of reports that the LTRO can provide. So there are certified reports which may include certified TSR, a land status map, or a probate inventory report. Or LTRO can provide uncertified reports that are based on information in the record of title.

Sections 150.303 to 304 address who can request and receive copies of title documents or LTRO reports. So owners of an interest in Indian land for the Indian land in which they own an interest, can request and receive any information about the interest that they own; the tribe with jurisdiction over Indian land, can request title documents or reports for the land that's subject to the tribe's jurisdiction.

And any person or their legally authorized representative who's leasing, using or consolidating Indian land or is applying to lease, use or consolidate Indian land, can obtain copies of title documents or LTRO reports. Anyone else who doesn't fall into any of those categories, must file a Freedom of Information

Act, or FOIA request. And copies can be requested, or LTRO reports can be requested through the region or agency office.

In order to obtain information, copies or LTRO reports, basically the information that the requester has to provide, is sufficient information for LTRO to be able to identify the tracts of property of the interest that they're inquiring about. So there are several options of information that a requester may provide. They can provide their name and date of birth or ID number if they're asking about their own interest. Or they can provide the name of the reservation where the land is located, and either the tract number or legal description; or the agency name and either the tract number or legal description.

Or they can just provide the legal description of the tract, or another title document pertaining to the tract, or the allotment number including the tribe or land area code, or the name of the original allottee. Persons who are leasing, using or consolidating land or applying to do so, would have to provide an additional - additional information to show that they fall into that category, so they're entitled to copies or LTRO report.

And a new section in the proposed rule is that LTRO may charge a fee for each copy of a recorded title document. But will not charge a fee to Indian landowners or their legally authorized representatives, for copies of title documents or reports for Indian land in which they own an interest. And the fee - the fees that LTRO may charge are set out in 43 CFR 2 Appendix A, which is the FOIA, Freedom of Information Act fee schedule.

An example of the fee rate is that there's a fee of 15 cents for each single cited page. LTRO has - in its discretion, may waive all or part of those fees. But any paid fees are nonrefundable. And if you're able to follow along in the

presentation, there's a screenshot on slide 25, of the fee schedule that LTRO proposes to follow, the FOIA fee schedule.

And then Subpart E, the last subpart, addresses ownership of records and provides the LTRO records are the property of the United States and federal records, if they're made or received by DOI or a contracting/compacting tribe in the conduct of a federal trust function. Or if they evidence the organization functions, policies, decisions, procedures, operations or other activities undertaken in the performance of a federal trust function. Other records that a tribe or tribal organization makes or receives in conducting business with DOI are the tribe's property.

So for records that the United States owns, tribes, tribal organizations and other organizations that make or receive those federal records, have to preserve them in accordance with the Federal Records Act. For records that are made or received in conducting business with DOI that the tribe owns, then tribes and tribal organizations should preserve those records for the period of time authorized by the archivist of the United States, for similar Department records under the Federal Records Act.

And that closes out the Part E. So our next step, we have - we're currently in the public comment period on the proposed rule. The comment deadline is February 9, 2021. And written comments can be sent to Consultation@BIA.gov or through the public portal, www.Regulations.gov. Since we're in maximum telework here at the federal government, due to the pandemic, there's no need to send a duplicate hard copy if you email your comment. And we have a goal to publish the final rule in late spring.

So with that, I think we're ready to open it up for input from tribes.

Coordinator: If you - if you would like to ask a question please press star 1 and record your name clearly when prompted. To withdraw you question you may press star 2. One moment please for our first question.

Johnna Blackhair: Thank you, Liz. While we're waiting for our first question I would just like to share our efforts in the Office of Trust Services, to modernize our systems as well as provide and expedite processes to better serve Indian Country. And improving our trust asset account management system and our business processes and flows.

So after we get the comments from our tribal leadership in this formal consultation, we'll move forward with coordinating the handbooks and the virtual trainings. No time more than during this pandemic has it been more apparent that we needed to update these outdated 40 year regulations and come into compliance with our current systems and operations and how we manage these trust transactions.

So thank you for the presentation, Liz.

Elizabeth Appel: So do we have any comments? If you have a comment or question, please feel free to press star 1 and the operator will open your line for you.

Coordinator: Our first question comes from (Elizabeth Homer). Your line is open.

(Elizabeth Homer): Thank you. Can you all hear me?

Elizabeth Appel: We can. Thank you.

(Elizabeth Homer): Awesome. All right. Thank you. My question is on Section 150.3. And it says a tribe may contract or compact under, you know, 638, to administer on

behalf, any portion of this part that is not an inherently federal function. And I know that there is no definition in the definition section, of inherently federal function. Is there something that fleshes out this inherently federal function term someplace else, or is this something that could be put into this document?

Elizabeth Appel: We have Conor Cleary from our Office of Solicitor Division of Indian Affairs with us today. Conor, would you like to address that question?

Conor Cleary: Sure. That same question came up on Tuesday as well. And so I'll give the same answer that I did then which is that we have not codified the definition of inherently federal function in the regulations because the meaning of the term differs depending on the context.

And to avoid any confusion or implication that, you know, the definition contained in 150 translates elsewhere, it's really examined on a case by case basis, and is - as far as any particular location, most of this is developed through, you know, either the policy level or in federal and administrative caselaw, that in the given situation, will examine whether a particular function is inherently federal in the context it's brought up. I know that's not particularly (helpful).

(Elizabeth Homer): Is it possible - yes. Yes. Is it possible to give some examples that fit this particular context? Because I think in the, you know, in the handbook for reg writing, I think that it does recommend that, you know, there at least be examples so that we kind of have a, you know, an idea of the kind of thing that would not be compactable or contractable.

Conor Cleary: Sure. Well and certainly any particular example of something that we could take a look at. What I would say for purposes of this call, is we certainly

welcome, you know, written comments with respect to this part of the rule, pointing out the need for greater clarity and perhaps suggesting examples that seem to fall on either side of that divide, whether they're inherently federal or whether they're not.

And then we, you know, can take a look at those in the comment review and that may provide some greater context on what people are specifically asking about, rather than me trying to identify, you know, any on the call. I would...

(Elizabeth Homer): Right. Well I...

Conor Cleary: ...strongly...

(Elizabeth Homer): ...yes, I'm not expecting that. I understand. Is it okay for me to ask all of my questions or should I back out, let somebody else ask their question and then try to come back in?

Elizabeth Appel: Let's - if you don't mind, since this is a formal consultation, let's give it a couple minutes to see if we have any officially designated tribal representatives.

(Elizabeth Homer): Okay. Okay, yes. That's what I - I thought you might want to do that.

Elizabeth Appel: Okay. Thank you.

Coordinator: Our next question comes from (Elizabeth Cook). Your line is open.

(Elizabeth Cook): Hi. Good morning. This is (Elizabeth Cook).

Elizabeth Appel: Good morning.

(Elizabeth Cook): I'm an attorney. Hi. I really just have a general question regarding some of the amendments to the land, title and records regulations and whether there will be any effect based on some of these new updates on the fee to trust process and the use of the TAAMS system.

Elizabeth Appel: (Donna), (Debbie) or Rick, would you like to respond?

Johnna Blackhair: Sorry. I was on mute. (Debbie), do you want to respond to that question, please?

(Debbie Cobrik): So it - the question is what kind of impact does the LTRO regulations update have with the fee to trust module? Is that my understanding?

(Elizabeth Cook): Yes. And yes, specifically the TAAMS system, because now, you know, each region, you know, uses TAAMS and so it's, you know, very specific and, you know, there are certain steps and certain things. So I was just curious yes, if it did have any impact on that.

(Debbie Cobrik): It does not have a negative impact on the fee to trust activities that have been established and are (attached) in the fee to trust handbook. But those two support the fee to trust activities.

(Elizabeth Cook): Okay. Thank you.

Coordinator: I would like to remind participants that to make a comment or ask a question, please press star 1 and record your name clearly when prompted. To withdraw your question you may press star 2. I show no questions in queue.

Elizabeth Appel: Okay. Do we have any - any tribal leaders with us who might want to make a comment before we open it up further? Okay. Hearing none, Ms. (Homer), if you'd like to press star 1 and ask your other questions, that would be welcome. Or anyone else who has a question or a comment.

Coordinator: I have (Elizabeth Homer) in queue. Your line is open.

(Elizabeth Homer): Oh, thank you. My next question is on 150.104 and this is a section that references that certain title documents may exist only in physical copies and not electronically. And I'm wondering if there is some kind of index or if you're accessing - is there some kind of an index where you can know the difference, you know, between what is being electronically stored and what is only physically stored.

Elizabeth Appel: So I think - and (Debbie) can - and Rick can correct me if I'm wrong, but I think that the - nearly all records are stored electronically. But there may be instances where for whatever reason, a record is only in physical copy. And so I understand your question to be how do you know if something is in a physical copy rather than electronic. And I think that with LTRO, LTRO would know that. (Debbie) and Rick can...

(Elizabeth Homer): Okay. Because this is not going to be a public - publicly accessible database at all; this is just accessible to the staff is what you're saying?

Elizabeth Appel: Right.

(Elizabeth Homer): So they're going to know what they have and what they don't have. Okay. That makes sense to me. My question is what kind of, you know, and this is a little bit off the regulation but it is something that, you know, I think that there might be others concerned about, is what is the backup on this system? I

mean this is like an incredibly important database. I mean I can't think of anything more important.

You know, what kind of backup or security system or, you know, is there redundant maintenance of this documentation? Is there a backup paper copy of Indian land records? Can you kind of address those security issues?

Elizabeth Appel: So this is definitely beyond my subject matter expertise to the extent I have any in this topic. But I don't know if we - I don't know if we have any TAAMS experts on the line.

Johnna Blackhair: Well the design of TAAMS enables BIA to have title staff work from any of those locations, complete the work digitally and electronically in remote locations. Thankfully, (Debbie Cobrik) was on the design team for TAAMS in, I forget how far back, the early 2000s. So she can probably answer those questions. She's also key in our modernization effort as we build out our modules within TAAMS with our staff and our subject matter experts in the field. So (Debbie), go ahead and answer please.

(Debbie Cobrik): Thank you, Johnna. And yes, there are system backups for the TAAMS system, in place. I can't go into detail with that not being, you know, specifically in an IT specific but there are...

Johnna Blackhair: Right. Yes.

(Debbie Cobrik): ...backup measures in place. I can also say that even though records are now becoming all electronic through the land title system, there is still paper records that are in the agency environment or the region environment, for those transactions that they're approving. And they're providing scanned copies of the paper transactions, to the LTRO for recording.

So you still have your paper system that is added, the agencies and regions as they process their transaction. Or hard copy records have been transferred to the records system, (NARA) for example. So there's always a paper record to go with what the electronic record is. And depending on where your location is, if the LTRO still has possession of the hard copy record in their system of record and haven't transferred it to the record center yet, but there is always that still in place there.

So we don't have a fully paperless environment right now, from transaction point from the agency to the LTRO. So there is still paper records there in addition to the electronic record that we have to the reporting process in TAAMS by the LTRO.

(Elizabeth Homer): Okay. Thank you. That's very helpful. You know, I guess I'm just of that age where it's really hard to let go of the paper. So that's why I ask. And then I have just one other little question. In 150.202 it says must I check with any other government office to find title documents for Indian lands. And I'm just wondering, to whom this I is referring. Is this just the person who's checking for the records? Is it for the lessors? I mean I guess I'm a little confused about this provision. It's the due diligence provision.

Elizabeth Appel: Yes. So that is (option) of the plain language that sometimes ends up not being so plain language. So it's from the perspective of anyone looking for title documents for Indian lands. So anyone who would be seeking Indian land title documents should be checking with the agency region who would check with the LTRO.

But in certain circumstances they would also have to check other records of title, whether it be the county records of title or others.

(Elizabeth Homer): All right. Well thank you very much. I really appreciate your answering my questions.

Elizabeth Appel: Thank you. Thank you for your comments.

Coordinator: I show no further questions in queue.

Elizabeth Appel: Okay. Anyone else have a comment or question? Please feel free to press star 1. And if you are thinking about questions or comments that you want to provide, there's always the opportunity to provide them in writing. Again, we're accepting comments until February 9th. And you can send those to Consultation@BIA.gov or through the Regulations.gov Web site.

If we have no other comments today I think we'll close out early. But I want to make sure that we're giving everyone the chance. If you would like to ask a question or make a comment, please do so now.

Coordinator: We have one question in queue.

Elizabeth Appel: Great.

Coordinator: Our question comes from (Panu Scout). Your line is open. (Panu Scout), your line is open.

(Panu Scout): Hello. This is (Panu Scout). I work for the Pueblo of (San Filippe). I would just like to...

Elizabeth Appel: Hi.

(Panu Scout): ...point out that - hi. Thank you. I would just like to point out that our governor, our leadership was not able to attend this call today because he is taking care of COVID-19 emergency functions. And...

Elizabeth Appel: Understood.

(Panu Scout): ...so while these land issues are of great importance to the Pueblo, the timing is not great. Here in New Mexico, at least for the Pueblo of (San Felipe), we are experiencing the emergency in a strong way. So it's hard to attend to these sorts of administrative functions when we're in an emergency situation.
Thank you.

Elizabeth Appel: Thank you for that comment. And that's totally understandable. I hope that you and everyone on the call, is staying safe. We have been trying to balance the keeping - keeping things moving forward as far as regulatory updates that are needed against, you know, we know that tribes have a lot of demands on them right now especially, so I hope that you all have the opportunity to take a look at these and provide some written comments.

Coordinator: I show no further questions in queue.

Elizabeth Appel: Well I want to thank everybody for joining today. I hope everyone is staying safe. And this is the last call if you'd like to make any comments, to press star 1. Otherwise, I will turn it back to Johnna to close us out.

Johnna Blackhair: Thank you, Liz. And thank you, everyone, for participating today. The Department of Interior, the Bureau of Indian Affairs is looking to better ensure effective operations and delivery of services through these mechanisms and these tools, so that we can best serve Indian Country. Coordination in this

tribal engagement is important to the Bureau of Indian Affairs and to the Office of Trust Services as we finalize this rulemaking process.

We would appreciate your comments, your suggestions. Each and every one of them are valued and appreciated as we move forward in providing this much needed work for Indian Country through these rules. I appreciate the time and attention and the work put forward by Liz, by Conor in our Solicitor's Office and by (Debbie) and Rick, to make this possible.

Like I said earlier, this has been 40 years in the making. A lot has happened during that 40 year time period. And in order for us to move forward and work in this modern era and digital age, we need to work together to show that our records are protected, preserved, our title is secure. And appreciate your time and attention and look forward to seeing your comments and your suggestions.

Thank you. Have a good day. Stay safe. And we'll talk to you again soon.

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