

INDIAN AFFAIRS DIRECTIVES SYSTEM HANDBOOK

1 IAM 1-H



Office of the Assistant Secretary - Indian Affairs
Office of Regulatory Affairs and Collaborative Action

#25-04, Issued: 10/17/24
Replaces #15-04, Updated: 11/24/14

FOREWORD

This handbook documents the procedures required to implement the Indian Affairs' (IA) Directives System, as detailed in Part 1 of the Indian Affairs Manual (IAM), and specifically in 1 IAM 1: Indian Affairs Directives System - General. This handbook supersedes all previous versions of the Directives Handbook.

This handbook is intended to assist all IA employees as they develop and/or update operational policies and procedures. Employees who have questions or comments regarding the Directives Handbook may contact Office of Regulatory Affairs and Collaborative Action's (RACA) Directives staff through the following email: IAPolicy_and_Directives@bia.gov.



October 17, 2024

Wizipan Garriott
Principal Deputy Assistant Secretary – Indian Affairs

Date

Table of Contents

CHAPTER 1 OVERVIEW	1
1.1 <i>Types of Policy</i>	2
1.2 <i>Parties to Development</i>	3
1.3 <i>General Guidance and Writing Tips</i>	4
CHAPTER 2 DIRECTIVES SYSTEM COMPONENTS	8
2.1 <i>The Indian Affairs Manual (IAM)</i>	9
2.2 <i>Regional Directive (RD)</i>	11
2.3 <i>Handbook (HB)</i>	12
2.4 <i>National Policy Memoranda (NPM)</i>	14
2.5 <i>Regional Policy Memoranda (RPM)</i>	15
2.6 <i>Assistant Secretary's Order (ASO)</i>	16
CHAPTER 3 ROUTING, SURNAMING, & SIGNATURES	17
3.1 <i>Use of the Data Tracking System (DTS)</i>	18
3.2 <i>Signature Authority Requirements</i>	20
Attachment 1 Formatting the Document Identification Number (DIN)	21

CHAPTER 1 OVERVIEW

The Indian Affairs (IA) Directives System documents the **policies** and **procedures** of the offices and functions under the authority of the Assistant Secretary of Indian Affairs (AS-IA), and is managed by the AS-IA's Office of Regulatory Affairs and Collaborative Action (RACA). The IA Directives System documents why, how, and what IA employees must do (and in some cases, not do). However, the IA Directives System is applicable *only* to IA employees (i.e., Federal Government employees), and it should not be used to tell the public (this includes Tribes) what they may or may not do (unless specifically documented in a Tribal contract or compact, or other legal or Department of the Interior (DOI) directive). Instead, laws and regulations are passed and published to tell the public/Tribes what they may or may not do (and in some cases, how to do it). Compliance with the IA Directives System is **mandatory for IA employees**¹.

The IA Directives System also:

- facilitates IA's compliance with the law to have accurate and accessible documentation for staff and the public;
- provides appropriate controls and documentation of IA program and administrative functions;
- provides structure and guidance to develop and publish consistent program policy and procedures, and thereby mitigate financial losses due to litigation;
- documents policy and procedure clearly and accurately to enable employees to perform their duties and responsibilities, and facilitate desired program results; and
- improves accountability and consistency across IA.

The two terms—*Policy* and *Directives*—are often used interchangeably. *Policy* conveys a deliberate plan of action to guide program decisions and to achieve desired results. *Directives* provide a formal means of communicating a specific instruction, often to support consistent application of, or changes to, policies and procedures. A directive usually instructs an employee (office, agency, organization) to *do* something, and can be written (in the form of policy) or verbal. However, throughout the remainder of this handbook, references to “policy” or to “directives” should be interpreted to mean policies and/or directives as part of IA's Directives System.

¹ Although the Bureau of Trust Funds Administration (BTFA) falls under the scope of the AS-IA, BTFA manages its own policies and is therefore mostly excluded from the IA Directives System at this time. BTFA policies and procedures are available on their respective SharePoint site: <https://doimspp.sharepoint.com/sites/btfa-official-documents/SitePages/Policies.aspx>.

#25-04, Issued: 10/17/24

Replaces #15-04, Issued: 11/24/14

Policy is required by law (the Federal Records Act and sections of the Administrative Procedure Act), which mandates that all government agencies provide, and make available to the public:

- proper documentation of their organization and functions;
- policies and procedures which ensure consistent and fair application of benefits or services; and
- the necessary policies and procedures to ensure a safe, effective, nondiscriminatory work place.

Additionally, as stated by the Government Accountability Office (GAO) in its document, *Standards for Internal Control in the Federal Government* (GAO-14-704G), “Internal control comprises the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity.”

This handbook provides guidance to assist IA employees in developing policies and procedures (and supporting documentation, if necessary) that affect IA programs and activities. The most current directives templates are available on RACA’s SharePoint site and should be downloaded from there: <https://doimsp.sharepoint.com/sites/doi-asia-raca/SitePages/IA-Directives-System.aspx>.

1.1 Types of Policy

IA’s Directives System is considered *operational policy* (i.e., internal policy and procedure), and its components apply to Federal Government employees only as stated previously (unless specifically written in to a Tribe’s compact or contract or other requirement, as noted above). Therefore, this type of policy does not require Tribal consultation.

Additionally, it should be noted that there is a difference between broad-based organizational “policy” (i.e., approaches to an issue or key initiatives by the current leadership/Administration) vs. operational policy. For example, a broad-based policy approach or initiative might be something like “Youth Service Corps” or “Investing in America”. These are usually externally-focused efforts that typically have a public and/or Tribal impact, and in some cases may require Tribal consultation.

Operational policy such as that documented in the IA Directives System is intended to document overall IA responsibilities, functions, authorities, and procedures, but it’s not intended to necessarily be all-encompassing, addressing every possible scenario or issue that could arise in the course of normal operations. In order to be effective, directives must be *published* and *available*, in addition to being as *accurate* and as *current* as possible.

Along these lines, situations may arise in the course of daily operations which require specific and timely action by IA employees and managers. A verbal directive may be given in these instances. Or, in some cases, Bureau Directors and leadership (based on authorities delegated by the DOI Secretary and/or the AS-IA) may decide to publish “policy” by personal memorandum. While personal memoranda are not published as part of the IA Directives System, these memoranda are still “directive”, and provide guidance for supervisors and/or employees required

for the performance of their duties. However, the challenges presented by “policy-by-memo” include:

- The memorandum is usually sent to a select group of people, and is not available electronically, or is not available in a central location for all IA employees to readily access.
- IA may have difficulty or lack the ability to produce these memoranda should it face a related records discovery request.
- The memorandum does not become permanent, formal IA policy until the memo contents are converted to one of the applicable IA Directives System components (see Chapter 2 of this handbook for more information).

Due to these challenges, directives should be developed in the appropriate policy template and officially added to the IA Directives System whenever possible, rather than issued by personal memorandum.

1.2 Parties to Development

IA offices/programs are considered the “originating” or “authoring” office, as well as the subject matter expert(s) (SMEs) regarding what and how functions are performed within their program; where and how information and decisions are secured; what requirements must be met to get benefits or service; and/or what procedures must be followed. Therefore, the originating office is responsible for ensuring that the directive’s content is as accurate and current as possible in order to meet regulatory, legal, and/or Departmental requirements.

The originating office is also responsible for working with RACA to maintain and revise their current policies and related procedures; develop new policies and procedures as needed; update Parts of the Indian Affairs Manual (IAM) as necessary; and to remove outdated information under the components of the Directives System within their area of authority.

The originating office should consider from the onset who might need to be involved in the development and naming of the directive. If another office, program, or functional area (e.g., Office of the Special Trustee (OST), Office of Hearings and Appeals (OHA)) is assigned taskings or responsibilities within the document, the referenced group may need to review what is being proposed.

In some cases, it may be appropriate to involve the Office of the Solicitor (SOL) in developing and/or reviewing a directive before it is approved by management/senior leadership. However, SOL involvement in the development and/or review of IA’s operational policies is *not required*. RACA will work with IA offices/programs to determine if/when SOL involvement is necessary.

1.3 General Guidance and Writing Tips

Directives are intended to convey basic requirements (including enough details to make the government's position clear) and should generally be limited to a few pages. If a policy, such as an IAM chapter, becomes longer, consideration should be given to reconstructing the material into additional components (for example, into an IAM chapter *and* a handbook, or into multiple IAM chapters). Handbooks provide a greater level of detail regarding *how* IA programs and staff carry out their responsibilities; they document the *procedures* required to implement the policy. Note that in IA, handbooks are not created to supplement National Policy Memorandums (NPMs) or Regional Policy Memorandums (RPMs), since these are considered “temporary” policy (see Chapter 2 of this handbook for more information).

Directives should be written in plain language² which is simple, and easily understood. Technical language may be included if absolutely necessary in a handbook for a specific group of employees trained for a specific task, but in general, technical language and legal jargon should be avoided at the policy level. Programs are encouraged to write directives as if they are writing them for a member of the public who knows nothing about the topic or function, rather than writing them as if for their peers.

Directives have standard formats that are generally unique to an organization. While formats differ in terms of how materials are organized, IA's directives typically contain certain required sections. For example, all IAMs will have the following sections:

- A **Purpose** section, explaining why the policy is being issued, and its desired effect.
- A **Scope** section, describing who the policy affects and what operations or areas are impacted by the policy. Scope may also expressly exclude certain people or activities from the policy requirements.
- A *brief* **Policy** statement, indicating the specific course-of-action or requirements being created.
- An **Authority** section, indicating the specific regulations, statutes, and other guidance (including handbooks and Executive Orders (EOs), etc.) that permit and/or guide the originating office to issue the policy and perform the functions described. Note that case law is not [usually] included in IA's operational policies.
- A **Responsibilities** section, indicating which office/staff is responsible for carrying out specific tasks related to the policy topic.

² The Plain Writing Act of 2010 was signed on October 13, 2010. The law requires that federal agencies use clear government communication that the public can understand and use. More information can be found on:

<https://www.plainlanguage.gov/>.

#25-04, Issued: 10/17/24

Replaces #15-04, Issued: 11/24/14

After this point, there are some additional optional sections that may be included, and are dependent on both the content and the type of policy being developed/updated. Judgment as well as discussion(s) with RACA should be used to determine which sections are necessary to provide proper documentation of the material being conveyed. Some policies may contain additional sections, such as:

- **Definitions**, providing clear and unambiguous definitions for unique terms and concepts found in the policy document. Note: if there is a companion handbook, the Definitions section should be included in the handbook instead.
- **Standards, Requirements, and Procedures** section if it isn't too lengthy. While there is no set limit on the number of pages for an IAM (or for the length of this section), consideration should be given to developing a companion handbook if procedural details are detailed and extending beyond five or more pages. However, it doesn't make sense to create a handbook for just a few pages of procedural detail when it can easily be included in the IAM chapter. The originating office and RACA can discuss options and the best course of action to document this type of content.
- **Reports and/or Forms** section, to explain reporting processes and/or forms and other documents that may be required to fulfill the intent of the directive.

Additionally:

- All font(s) should be in Times New Roman (TNR), size 12 (except for headers and footers, which are already set in the templates).
- One space should be used between sentences.
- Tribe/Tribal and names of Tribes should always be capitalized.
- Footnotes should be in TNR, size 10; and footers should be in TNR, size 11.
- Acronyms should be used sparingly and only after the acronym has been spelled out the first time it is used in a document. An "Acronym" listing or attachment is usually not needed but may be included in a handbook if a significant number of acronyms are used throughout the handbook. Typically, this will be included as an Attachment.
- Attachments (not "Appendices") should be used sparingly; and if used, should be easy to read (e.g., scanned documents are not easy to read), and limited in length and number. Many times, it is more appropriate for RACA to post the item on the [IA Online Forms webpage](#) under '[Indian Affairs Specific Forms and Guidance](#)' rather than adding it as an Attachment to the directive. This also allows the program flexibility to edit and change the Attachment as needed.

- The use of pictures, tables, charts, and other illustrations is strongly discouraged as these make it difficult to ensure the directive is 508 compliant (see section 1.3.2 of this handbook for more information).

1.3.1 Getting Started

Specific guidance for developing each type of directive can be found in Chapter 2 of this handbook. Additionally, the presentation “How to Develop a Policy or Directive” provides guidance on developing directives, and is located on RACA’s SharePoint site here: <https://doimsp.sharepoint.com/sites/doi-asia-raca/SitePages/IA-Directives-System.aspx>.

Here are some tips for getting started:

- 1) Do some research:
 - Review the regulatory language which governs your program or office.
 - Make sure there isn’t already an IAM chapter (or other directive) that covers your topic.
- 2) If it’s a *new* IAM chapter (or other directive), look at the currently published IAM online to determine where your chapter will likely be located: <https://www.bia.gov/policy-forms/manual>. Other directives can be found online through this webpage: <https://www.bia.gov/directives-system>.
- 3) Collaborate with your office colleagues and immediate supervisor/management (as needed) to develop the content of your directive by doing the following:
 - Outline the primary functions your office is responsible for and/or your office’s key ‘mission areas’ (valuable when organizing policy chapters).
 - Gather and catalog any recent “policy-by-memo” or other internal guidance that might be useful (i.e., memos or bulletins issued by your office/program management that describe policy, process, or procedure).
 - If necessary, research laws, government-wide policy, state/federal regulations, or other sources of information that may impact your content (including the authority(ies) by which your program operates).
 - Remember to use the current templates provided for policy development. **You cannot create your own template.** Also, do not edit/change the format of any template. The templates are provided on the IA Directives internal SharePoint site here: <https://doimsp.sharepoint.com/sites/doi-asia-raca/SitePages/IA-Directives-System.aspx>.

- If you are *updating* a directive, reach out to RACA to request the ‘final’ Word version of the directive as it’s currently published; this might make updates easier for the program (unless the current directive version is out of date or very old; then the program will need to use the latest directive template as posted on RACA’s SharePoint site).
- 4) Circulate your draft internally for comments and review within your office, as well as to RACA. Send your draft to RACA **early on in the process** so that all parties are able to address concerns/issues as soon as they arise, and ensure that the correct format is in use. RACA may also be aware of historical issues, current discussions/concerns, the need to involve SOL, or other issues that may impact or influence your policy as well as the timeline for completion.
 - 5) Remember to use plain language (www.plainlanguage.gov); avoid technical and legal jargon!
 - 6) Remember your audience: *our employees*; but the policy must be **understandable by all**. Directives should be written in such a way that a brand new employee or a member of the public who knows nothing about the topic can read the directive and understand it.

1.3.2 Compliance with Section 508 Requirements

In 1998, Congress amended the Rehabilitation Act of 1973 to require Federal Government agencies to make their electronic and information technology accessible to people with disabilities. Under Section 508, agencies must give disabled employees and members of the public access to information that is comparable to access available to others. The Department, and thereby IA, is committed to making its information and communication technology accessible to individuals with disabilities by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

In simplest terms, this means that all documents published online – such as IA’s directives, forms, etc. – must be compliant to the greatest extent possible with 508 requirements. Along these lines, the Department discourages the use of pictures, tables, charts, illustrations, and the like as they are difficult and time consuming to make 508 compliant. RACA strives to ensure that directives and forms are 508 compliant before posting them to the IA webpage(s). However, RACA’s resources are limited, and RACA strongly encourages programs/offices to use *words* (vs. pictures, tables, etc.) to convey directive content.

If a program/office feels strongly that a table or illustration, etc. is critical to explaining the content of its directive, RACA will discuss options with the program/office. In some cases, the program/office may need to hire a contractor, work with its internal [webpage] Content Manager, or request assistance from IA’s Office of Information Technology (OIT) to perform 508 compliance checks (and address issues) on pictures, tables, etc. that are included in a directive.

Additional Departmental guidance on 508 compliance can be found in 375 DM 8: Section 508 Program and Responsibilities, and online here: <https://www.doi.gov/ocio/section508>. IA guidance can be found here: <https://www.bia.gov/webstandards/design/accessibility>.

CHAPTER 2 DIRECTIVES SYSTEM COMPONENTS

There are six components of the IA Directives System:

- **Indian Affairs Manual (IAM) chapters** are considered permanent policy which describe (in general) what the program or functional area is responsible for (what they do), under what authority they do it, and the specific responsibilities of program and other staff to implement the policy.
- **Regional Directives (RDs)** are usually companions to IAM chapters, providing additional information and instructions that apply to employees within the jurisdiction of a particular regional office.
- **Handbooks (HBs)** convey the processes and procedures IA employees use to perform their duties, and should tie to a companion IAM policy chapter.
- **National Policy Memorandums (NPMs)** are temporary policies which provide interim instructions regarding the official duties and responsibilities of IA employees. These policies are effective for one year, after which they may be extended for another year (with a maximum of two extensions); or, be converted to an IAM; or, be allowed to simply expire.
- **Regional Policy Memorandums (RPMs)** adapt interim national policy to circumstances unique to particular regions, and are considered temporary. They follow the same effective and extension process as NPMs.
- **Assistant Secretary's Orders (ASOs)** are temporary directives by which the AS-IA may issue delegations of authority, special assignment of functions, initial functional statements establishing new organizational units, and emergency directives.

The most common directives in use by IA are IAMs, NPMs, and HBs.

The following sections describe in more detail each of the six components of directives, and the process for developing/updating each one. **Not every element of every template will apply to every program.** As stated previously, the most current version of the templates and examples are located on RACA's SharePoint site and should be downloaded from there. **Do not alter templates for any reason.**

2.1 The Indian Affairs Manual (IAM)

The IAM documents IA’s “permanent” policy for its functions and programs. However, that does not mean it can’t be modified or edited. In fact, all directives—in particular IAMs—should be reviewed and updated *every two years* in accordance with Departmental policy (at a minimum: they should be reviewed, surnamed, and given new release numbers every two years).

The IAM is organized into sections called Parts, which reflect the major IA functions and programs (for example: Budget, Trust, Education, Forestry) under the authority of the AS-IA. Each Part is further divided into chapters, which describe (in general) *what each program or functional area does, under what authority they do it, and the key responsibilities of staff/management*. The current version of the IAM is located online here: <https://www.bia.gov/policy-forms/manual>.

Situations may arise where a program office and RACA will work together to revise and/or re-number Parts of the IAM as well as policy chapters. This usually occurs if a program/office has been re-organized, or is rescinding policy chapters and wants to improve the organization of its IAM Part(s).

2.1.1 Developing/updating an IAM chapter

To develop or update an IAM chapter, the following steps apply:

- 1) The office with primary subject responsibility (again, the “originating” or the “authoring” office) contacts RACA to inform them of their policy need, request guidance on development as needed, including the correct type of directive required, and obtains the current template(s) if unable to locate it on RACA’s SharePoint site. They may also request the ‘final’ Word version of the IAM currently posted on-line to facilitate their updates. However, depending on the issue date of the policy, the program may need to copy and paste content into the most recent version of the IAM template. This can be discussed when the originating office contacts RACA about their policy needs.
- 2) The originating office then updates or develops the initial chapter content. This office is the SME regarding what and how functions are performed; where and how information and decisions are secured; and what requirements must be met to receive benefits or service(s). The originating office’s responsibility for content ensures that program attributes are documented accurately and in compliance with regulatory requirements.
- 3) The originating office should circulate the draft internally for review and comment as needed.
- 4) The originating office then sends the draft to RACA via email for review and assignment of a new release number.

- 5) RACA will review the draft, make edits using track changes (usually), and add comments where needed. RACA will send the edited version back to the originating office/program's Point of Contact (POC) via email for them to review and address the items noted. This may occur several times where drafts are emailed back and forth between RACA and the program/office POC.

Note: Flexibility is important to directive development and maintenance. In some cases, RACA will provide programs with more extensive input regarding content, including research, initial policy drafting, and other assistance as requested by the program and as RACA resources allow.

- 6) Once the chapter text is revised in response to edits and comments, the originating office and RACA will determine together when the directive is 'final'.

Note: All edits will be done in Word and will be completed before surnaming begins. As discussed in Chapter 3 of this handbook, RACA does not use the Policy Database within the Data Tracking System (DTS) for editing, only for obtaining surnames and final [digital] signature.

- 7) RACA will work with the originating office to determine the appropriate surnames that are required, and RACA will then request email surnames from originating office staff/management as necessary. This is due to Policy Database routing limitations in DTS (again, see Chapter 3 of this handbook for more information).
- 8) RACA then uploads and routes any email surnames obtained—along with the 'final' version of the policy (converted to Adobe PDF)—into the DTS for additional (usually management's) surnaming and final [digital] signature of the appropriate senior management official. Only RACA uploads the document into the DTS Policy Database and establishes the routing. There is *no hard copy surnaming*; therefore, there is no Transmittal or Clearance Record anymore.

Note: RACA requires surnames (whether via email or in DTS) from ***all program staff/management who provide input to a directive***, not just Directors/senior management.

- 9) As stated above, RACA does not use DTS for editing purposes; all edits should be made during the back-and-forth review and editing process prior to the policy being deemed 'final'. However, in the event that something was missed, or an edit/comment is received through the surnaming process in DTS, RACA will coordinate any recommended changes or corrections with the originating office, as well as any additional surnaming (as needed).

Note: This coordination and additional editing is done via email, *not* through DTS. RACA will upload an edited 'final' document as a new version in DTS and will add a 'Route Comment' explaining why the directive was edited, and any other details as necessary.

- 10) Once the policy is digitally signed in DTS, it is routed back to RACA for final processing.

11) Once RACA has completed final processing, RACA then uploads and publishes the policy to the IA Directives website, and sends an email communication announcing publication of the policy (with a link to the Directives website) to IA senior leadership, Deputy Directors, appropriate Chiefs of Staff (COS), Regional Directors and Deputy Directors, program management and staff involved in the policy, and any others as needed.

Note: The date the directive is digitally signed becomes the “Issued” date of that directive, and is the date noted on the webpage next to the directive as the “Issued” date as well.

12) RACA then sends ‘final’ Word and PDF copies of the directive to the originating program/office staff.

13) The originating office is responsible for ensuring that program staff and others (as appropriate) are aware of the policy’s publication, and where to locate it online.

2.1.2 Rescinding an IAM chapter

If a program decides that a chapter is no longer valid or necessary, the program/office Director should send an email to IAPolicy_and_Directives@bia.gov or to their individual RACA Directives contact, indicating which chapter should be rescinded and why. This is usually the Office Director or Chief; for example, the OFPSM Director would need to send an email to rescind an OFPSM-related policy.

Once RACA receives the email request, RACA will remove the link to the chapter on the IA website, and note next to the chapter title that it has been rescinded and the date that occurred. Additionally, RACA will save the email as an electronic record in its files to document the request.

If necessary, RACA will also send an email to IA senior leadership, Deputy Directors, appropriate Chiefs of Staff (COS), Regional Directors and Deputy Directors, program management and staff involved in the policy, and any others as needed informing them that the chapter has been rescinded.

2.2 Regional Directive (RD)

A RD further implements an IAM policy at the regional level and pertains to IA employees within the jurisdiction of a particular regional office. Although they convey additional instructions that may apply only to one or more specific regions, RDs must not conflict with established IA policies and procedures. The current listing of RDs is located online here: <https://www.bia.gov/policy-forms/regional-directives>.

RDs are written in the same style and format as IAM chapters, so a separate template is not provided. RDs are differentiated by adding a third line in the header to identify the originating region and the title of the associated RD. The document identification number for RDs adds a hyphen and the two-letter Regional Office Letter Code to the associated IAM chapter number (for example, 53 IAM 3 - MW). In the organization of the IAM, they are placed following the respective IAM chapter to which the RD supplements.

#25-04, Issued: 10/17/24

Replaces #15-04, Issued: 11/24/14

The Regional Office Letter Codes are as follows:

AK	Alaska	NW	Northwest
EA	Eastern	PA	Pacific
EO	Eastern Oklahoma	RM	Rocky Mountain
GP	Great Plains	SO	Southern Plains
MW	Midwest	SW	Southwest
NA	Navajo	WE	Western

As with any directive, the [regional] office with primary subject responsibility should prepare the directive's content. Since the RD tailors IA policies to the unique needs or business processes of individual regions, the regional SMEs should be involved in identifying and drafting the information needed to document official responsibilities and management of the organization.

2.2.1 Developing/Updating a RD

To develop or update a RD chapter, the same steps apply as documented in 2.1.1 for developing/Updating an IAM, with the following exceptions:

- The regional policy should be shared with their respective IA Central Office counterpart for awareness, and to ensure the policy does not conflict with any existing or potential upcoming policy.
- Once a regional policy is deemed 'final' by the region and RACA, it will be reviewed and surnamed (usually via email) by the regional staff who participated in its development and any applicable regional management, and then routed by RACA to the appropriate Regional Director in DTS for surnaming.
- Once the Regional Director has surnamed the policy, it will continue routing in DTS to the Deputy Bureau Director, Field Operations for review and surname, and then on to the Director, Bureau of Indian Affairs (DBIA) for final [digital] signature.

Note: Regional Directors do not have the authority to sign regional policies; only the DBIA can do that.

2.3 Handbook (HB)

A HB provides a greater level of detail regarding *how* an IA program/staff carries out their responsibilities. In simplest terms, a HB documents the *procedures* that implement the related policy. For this reason, HBs should be tied to a companion IAM policy chapter. However, there may be occasional situations where that is not the case, and a HB will stand alone. That should be the exception though, and not the rule. The current listing of HBs is located online here:

<https://www.bia.gov/policy-forms/handbooks>.

HBs should be written clearly, concisely, and get right to the point. This helps facilitate ease of use as well as readability. There should be no Scope, Policy, Authorities, or Responsibilities as these should be covered in the companion IAM chapter (the exception would be if there is no companion IAM). Additionally, background and/or historical information should be limited and brief, if included at all. While there is no 'set' page limit on handbooks, programs should try to keep them to 100 pages or less so that they are easy to open/access (important in the field), and for overall ease of use in general.

As mentioned previously, tables, pictures, illustrations, and the like should not be included due to 508 compliance challenges. If a program wants to include one of these, it will need to be discussed with RACA and ultimately, the *program* will need to ensure those items are made 508 compliant before they are submitted to RACA for review, as well as before the approved HB is published online to the HB webpage.

Finally, forms and/or checklists should not be included in HBs whenever possible. Instead, these should be provided to RACA for review and posting to the IA Online Forms webpage, and a link included in the HB that points to that webpage. RACA will work with the program to ensure those documents are 508 compliant before posting them online.

While a standard template is not required for the content of HBs, they must be reviewed and approved by RACA and all appropriate program officials, and go through the same surnaming process as a policy prior to issue. Additionally, RACA requires the following for HBs:

- A cover/title page which states:
 - Title of the HB
 - Program the HB is affiliated with
 - Official name and address of the issuing office
 - Footnoted release number, date, and related IAM chapter (if applicable)

Note: RACA provides a template for the cover/title page which programs must use.

- HB content must also include the following:
 - Table of Contents
 - Chapter and page numbers which match the table of contents
 - Correct citations and current authorities (i.e., references to CFR, U.S.C., official governing policies, regulations, or treaties) where applicable
 - Current and accurate names of IA offices and official titles
 - Any Attachments must be clear and easy to read (i.e., no scanned pages, etc.)
 - Links to websites where resources/references can be found is preferred as that ensures the most accurate and up to date information is being referenced (vs. including it as an Attachment or within the body of the HB). This includes forms and checklists as noted above.

2.3.1 Developing/Updating a HB

To develop or update a HB, the same steps apply as documented in 2.1.1 for developing/updating an IAM, with the following exceptions:

- In theory, an IAM should be **developed** *before* a companion HB, but in many cases they are developed together at the same time.
- When **updating** a HB, the companion IAM should be reviewed and updated as well (if updates are needed).
- These documents need to cross-reference each other and therefore need to be finalized, published, and available on-line at roughly the same time. In other words, consideration should be given to timelines when developing/updating a HB and its companion IAM chapter; HBs often take longer to develop and/or update, and this can impact the publication of the companion IAM as well.

2.3.2 Developing a Standard Operating Procedure (SOP)

Official HBs are available to employees as well as to the public on the IA Directives webpage. There may be cases, however, where a program office needs to develop an *internal* operating “handbook” or guidance document that should not be publicly available (e.g., a Justice Services handbook on operating security for detention centers). These are typically referred to as “SOPs” and these types of documents do not need to follow the guidance in this HB or come through RACA for review and approval.

SOP documents are also not posted on BIA.gov, which means that the program office should ensure that they have a SharePoint site, online shared drive, or other employee-only method for accessing SOP documents.

These internal-use only documents should follow the program office’s own process for SME involvement and management review and approval. Additionally, if posted on a program’s SharePoint site or other internal webpage (again, accessed only by employees), these documents still need to be made 508 compliant. The program office should work with their Content Manager or reach out to IA’s OIT for assistance with 508 compliance if needed.

2.4 National Policy Memoranda (NPM)

A NPM provides *interim* instructions regarding the official duties and responsibilities of IA employees, and they tend to be broad in scope and application. A NPM is valid for one year, after which it is evaluated for relevance. The current and expired listing of NPMs is located online here: <https://www.bia.gov/policy-forms/memoranda/npm>.

Once a NPM is nearing its expiration date, there are three options for the program to consider:

- 1) Extending the NPM (i.e., “Amendment 1”) for an additional year; or,
- 2) Converting the NPM to permanent policy (i.e., an IAM chapter); or,
- 3) Allowing the NPM to expire.

Only two extensions (“amendments”) are allowed before the NPM must be converted to an IAM chapter or allowed to expire.

RACA tries to reach out to programs at least 30 days before an NPM is set to expire to discuss the options available and the program’s needs. However, program offices should also be aware of their current NPMs and related expiration dates.

There have been some discrepancies in the past regarding the review and sign-off on NPMs and the recording of “effective” and “expired” dates. As discussed in section 2.1.1, the signature date (i.e., final signatory approval date) is always the “issued” (effective) date. In a few rare cases, however, the “effective” and/or “expired” date on some NPMs has been different than one might expect. The NPM document must be read in order to understand some of the effective and expired dates.

As with any directive, a NPM is signed by the final signatory authority for that program. See section 3.2.2 of this handbook for more information on signatory authorities.

2.4.1 Developing/updating a NPM

To develop or update a NPM, the same steps apply as documented in 2.1.1 for developing/updating an IAM, with the following exception:

- RACA will provide the program office with the proper nomenclature and numbering for the NPM. For example, a NPM for an Office of Trust Services (OTS) program will be titled: “NPM-TRUS-XX”.

2.5 Regional Policy Memoranda (RPM)

A RPM adapts interim policy to circumstances unique to a particular region. RPMs convey instructions regarding compliance, and establish roles and responsibilities for IA employees within the jurisdiction of a regional office. Regional policy cannot conflict with or supersede national policy (i.e., IAMs and/or NPMs). The current and expired listing of RPMs is located online here: <https://www.bia.gov/policy-forms/memoranda/rpm>.

RPMs are effective for one year (and can be extended for one year), after which the information published in a RPM should be incorporated into a RD chapter (again, using the IAM template), or simply be allowed to expire. The same Regional Office Letter codes apply as those located in section 2.2 of this HB.

2.5.1 Developing/Updating a RPM

To develop or update a RPM, the same steps apply as documented in 2.1.1 for developing/Updating an IAM, with the following exceptions:

- The regional policy should be shared with their respective IA Central Office counterpart for awareness, and to ensure the policy does not conflict with any existing or potential upcoming policy.
- Once a RPM is deemed ‘final’ by the region and RACA, it will be reviewed and surnamed (usually via email) by the regional staff who participated in its development and any applicable regional management, and then routed by RACA to the appropriate Regional Director in DTS for surnaming.
- Once the Regional Director has surnamed the policy, it will continue routing in DTS to the Deputy Bureau Director, Field Operations for review and surname, and then on to the DBIA for final [digital] signature.

Note: A reminder that Regional Directors do not have the authority to sign RPMs; only the DBIA can do that.

2.6 Assistant Secretary's Order (ASO)

An ASO is limited to delegations of authority, emergency directives, special assignment of functions, and initial policy and functional statements establishing a new organizational unit; they are rarely used. ASO provisions remain in effect for one year unless extended, revoked, or incorporated into the IAM. The current listing of ASOs is located online here:

<https://www.bia.gov/policy-forms/assistant-secretarys-orders>.

2.6.1 Developing an ASO

Once it’s been determined that an ASO is the necessary level of policy, the same steps apply as documented in 2.1.1 for developing/Updating an IAM, with the following exceptions:

- AS-IA staff/counselors would work with RACA to ensure SOL involvement as necessary.
- RACA will coordinate surnaming in DTS with the Executive Secretariat - Indian Affairs (ESIA) staff, as well as obtaining approval (if appropriate) from the DOI Office of the Executive Secretariat (Exec Sec).
- ASOs are signed only by the AS-IA, the Principal Deputy Assistant Secretary (PDAS), or an Acting Assistant Secretary.

CHAPTER 3 ROUTING, SURNAMING, & SIGNATURES

Once the draft policy has been circulated internally for review and comment, reviewed by RACA, and all edits incorporated as necessary, it is then considered “final” and ready for surnaming and final signature. The surname process is used to coordinate official review and concurrence with the content of a written document(s). This process is designed to improve internal communication, to ensure that content of the directive is accurate, and to ensure IA provides consistent guidance. In all cases, the originating office will work with RACA to ensure all necessary surnames have been obtained.

Policy documents should be routed through offices/authorities with a direct interest in or responsibility for, the functions or responsibilities that are covered by the policy. However, if the Responsibilities section of a policy basically restates what is required by law, an EO, and/or Departmental requirements, it is not always necessary to route the policy for signatures through all offices in the section. It is subject understood that offices, programs, and/or bureau management should be aware of legal and/or Departmental requirements. If the originating office wants to ensure awareness and concurrence by all parties identified in the Responsibilities section, however, they should coordinate that with RACA as RACA will be the one to facilitate final review and surnaming of the directive. In some instances, RACA may route or email a “courtesy copy” of a directive to another office or program that is identified in the Responsibilities section; however, RACA will discuss that with the originating office first.

While the identification of appropriate officials for surnaming is a case-by-case determination in coordination with RACA, some general requirements are:

- **AS-IA Office Directors** and **BIA/Bureau of Indian Education (BIE) Deputy Bureau Directors** must surname any policy originating in their organization that requires the signature of the DBIA; Director, BIE (DBIE); or any official in the Office of the AS-IA.
- **SMEs** must review policy that addresses specific matters. For example: a policy concerning performance measurement reporting should involve the IA Office of Budget and Performance Management (OBPM) staff.
- Any policy document that requires the signature of the **AS-IA** must be coordinated with ESIA staff, and is typically routed to AS-IA counselors for review before signature. In some cases, SOL may also be asked to review a policy document if it will be signed by the AS-IA.
- RACA may require review and surnaming by SOL if a policy contains information regarding Individual Indian Money (IIM) accounts/issues, Trust responsibilities/obligations issues, potentially high visibility/contentious issues, or issues requiring legal concurrence of some kind. RACA will discuss this with the program at the onset of policy development. Note that RACA typically requests SOL surnames via email instead of utilizing DTS, especially when a policy is time sensitive and/or is on a strict timeline for completion.

General routing for IAM chapters, NPMs, and HBs:

- Originating program office
- Other offices affected by the directive
- Supervisor and/or Office Director of program or functional area
- Deputy Bureau Director/Director (if applicable) of program or functional area
- Approving Official (digital signature required): AS-IA; PDAS; Deputy Assistant Secretary (DAS); DBIA; or DBIE
- RACA for final processing, etc.

General routing for RDs and RPMs:

- Originating program office
- Other offices affected by the directive
- Supervisor and/or Office Director of program or functional area
- Regional Director
- DBD Field Operations
- Approving Official (digital signature required): DBIA
- RACA for final processing, etc.

General routing for ASOs:

- Originating program office (which would be the AS-IA/ESIA)
- Other offices affected by the ASO, if appropriate
- Deputy Bureau Director/Director of program area, if appropriate
- Deputy Assistant Secretary; DBIA; or DBIE, if appropriate
- AS-IA Chief of Staff (COS) and/or AS-IA counselors, if appropriate
- SOL, if appropriate
- Approving official (digital signature required): AS-IA; PDAS; or Acting Assistant Secretary
- RACA for final processing, etc.

3.1 Use of the Data Tracking System (DTS)

The DTS is the Department's enterprise-wide correspondence system. All IA bureaus and offices are required to use DTS for creating, tracking, logging, and processing official IA correspondence. Given the success of utilizing DTS for controlling correspondence, IA expanded DTS to include the Federal Register Database, as well as the Policy Database (in 2014). Implementation of the Policy Database allows for electronic surnaming and digital signatures within the system, and negates the need for hard copy surnaming packages for policy documents. Therefore, the Clearance Record and Transmittal sheet documents are no longer needed.

However, unlike with correspondence and other documents routed within DTS, the Policy Database is not used for editing documents. RACA uses it solely to document surnames and obtain a final [digital] signature for a directive. As mentioned previously, there may be rare instances when an edit or update is required to a policy that is not realized until the document is

already routing in DTS. In these cases, RACA will work quickly to make and/or coordinate any edits with the originating office as necessary; this is done via email, and not through DTS. RACA will ensure the correct edited version is uploaded into DTS, all parties are notified as necessary, and a 'Route Comment' added to the DTS record to document what changes occurred/why.

RACA will also work with management and program staff to determine the correct surnaming participants *before* routing for action in the system. However, the Policy Database has a limited capacity to route to individuals within IA as it was designed to route to program offices instead of specific positions/titles. This means that RACA will request email surnames from staff, management, and any others involved in the policy's development that are not available in DTS. In other words, usually only Office Directors and senior leadership positions are available in the DTS for electronic surnaming; all other surnames must be obtained via email.

The following standards and procedures apply regarding the use of DTS for directives:

- ALL IA directives will be routed in DTS by RACA (and *only* by RACA).
- All directives will be routed for electronic surnaming (via email and DTS) by RACA, and will not be surnamed in any other manner (i.e., no hard copy routing), unless discussed with RACA in advance and only if absolutely necessary.
- Final signature on a directive will be documented via the digital signature process (RACA provides instructions on how to do this in its 'Route Comment' to the senior leadership official responsible for signing the directive). Once a directive is signed, the signatory authority's staff should ensure the signed version is uploaded into DTS and routed back to RACA for final processing (RACA provides instructions on how to do this in its 'Route Comment' to the senior leadership official responsible for signing the directive).

Timely review of documents is extremely important. **Offices and management involved in the surnaming process should strive to review and surname the document as soon as possible (typically 3-5 business days).**

3.2 Signature Authority Requirements

The chart below shows the signature authority requirements for each category of policy/directive. The Approving Official must be at the Bureau Director level³ or above for *all* policies. In other words, all offices/programs that fall under BIA must have their directives signed by the DBIA; all offices/programs that fall under the BIE must have their directives signed by the DBIE; all offices/programs that fall under the Deputy Assistant Secretary – Management (DAS-M) must have their directives signed by the DAS-M; and so on. For example: An IAM that’s developed for an Office of Indian Services (OIS) program would be signed by the DBIA; or a NPM that’s developed for an office/program that reports to the PDAS would be signed by the PDAS.

However, IA employees serving in an ‘Acting’ capacity may sign a directive unless prohibited by IA or Departmental policy, or some other restriction. For example, a Deputy serving as the ‘Acting’ BIA Director may sign BIA policies on behalf of the DBIA.

Type	Authority
IAM	AS-IA; PDAS; Deputy Assistant Secretaries (DAS); DBIA; DBIE
Handbook	AS-IA; PDAS; DAS; DBIA; DBIE
NPM	AS-IA; PDAS; DAS; DBIA; DBIE
RD, RPM	DBIA
ASO	AS-IA; PDAS; Acting AS-IA

³ Note: 230 DM 1, Delegation of Authority (from the AS-IA) to Director, Bureau of Indian Affairs and the Director, Bureau of Indian Education, states: “Authority to approve additions to or modifications to the Indian Affairs Manual may not be redelegated.”

Attachment 1 Formatting the Document Identification Number (DIN)

The DIN is the unique identification number and letter code for the type of directive being issued. This number will be provided by RACA and/or discussed with the originating office as necessary.

Permanent Policy

For permanent policy directives (IAM chapters, Handbooks, and RDs), the DIN is constructed of: the Part number assigned to the major function or program (from the Index of Parts and Chapters of the IAM); the type of directive being produced; and the respective chapter number.

For example, an IAM chapter from Education would have a document identification number beginning with 33 (the IAM Part # for Education), then IAM (identifying the type of document), followed by the respective chapter release number (i.e., **33 IAM 5**).

HBs that are companions to IAM chapters are identified by an “-H” at the end of the associated IAM document identification number (i.e., the HB associated with Education chapter 33 IAM 5 would be **33 IAM 5 - H**).

RDs are differentiated by the two-letter Regional Office Letter Code for the particular region producing the directive (i.e., “- MW”) at the end of the associated IAM document identification number. A RD further refining 33 IAM 5, pertaining specifically to employees within the jurisdiction of Midwest region, would be **33 IAM 5 - MW**.

Temporary (Interim) Policy

For NPMs, the DIN is constructed of: the acronym for the type of directive; the Issuing Office Letter Code; and a consecutive number based on the originating office’s production of directives. For example, a NPM from the Office of Human Capital Management would begin with NPM (acronym for the type of directive), followed by “OHCM” (the issuing office letter code), and a number (i.e., **NPM-OHCM-8**).

For RPMs, the DIN is constructed of: the acronym for the type of directive; the two-letter Regional Office Letter Code for the particular region producing the directive (for example “- MW”); the Issuing Office Letter Code; and a consecutive number based on the originating office’s production of directives. For example, a RPM pertaining only to IA employees within the jurisdiction of the Midwest Region, further refining the NPM for OHCM may read **RPM-MW-OHCM-8**.

For ASOs, the document identification number is just ASO and the consecutive number (i.e., **ASO-4**).

Attachment 1 continued

<u>Citation</u>	<u>Type of Directive</u>
## IAM ##	Indian Affairs Manual chapters
## IAM ## - H	Handbook to the Indian Affairs Manual
## IAM ## - XY	Regional Directive (<i>XY = the respective Regional Office Letter Code</i>)
NPM - XXX - #	National Policy Memorandum (<i>XXX = the Issuing Office Letter Code</i>)
RPM - XY - XXX- #	Regional Policy Memorandum (<i>XY = Regional Office Letter Code</i>)
ASO - #	Assistant Secretary's Order

Key

#	=	Consecutive numbering
##	=	IAM Part/Chapter numbers
H	=	Handbook of the IAM
XY	=	Regional Office Letter Code
XXX	=	Issuing Office Letter Code

(XY) Regional Office Letter Codes for Regional Directives and Regional Policy Memoranda

AK	Alaska	NW	Northwest
EA	Eastern	PA	Pacific
EO	Eastern Oklahoma	RM	Rocky Mountain
GP	Great Plains	SO	Southern Plains
MW	Midwest	SW	Southwest
NA	Navajo	WE	Western

(XXX) Issuing Office Letter Codes for National and Regional Policy Memoranda

Issuing Office Letter Codes are subject to change, in coordination with RACA and based on changes/updates to IA's organization and/or to program responsibilities. *This is not an all-encompassing list*; additional Office Letter Codes may also be added to this list as needs arise. For example, NPMs that used to be labeled "NPM-HR-XX" for Human Resources, would now be labeled "NPM-OHCM-XX"; or NPMs that used to be labeled "NPM-FIN-XX" for finance-related policy, would now be labeled "NPM-OCFO-XX".

ACKN	Office of Federal Acknowledgment
ACQU	Acquisition/Office of the Chief Financial Officer (OCFO)
AS-IA	AS-IA (General)
BUDG	Budget/Office of Budget and Performance Management (OBPM)
CNAA	White House Council on Native American Affairs
COS	AS-IA Chief of Staff (COS) & sub-offices
DAS-M	DAS-M (General)
DBIA	BIA - Other
DBIE	BIE - Other
DFMC	Division of Facilities Management and Construction/OFPSM
DHS	Division of Human Services/OIS

EDUC	Education (BIE)
GAME	Office of Indian Gaming
OCFO	OCFO (General)
OCLA	Office of Congressional and Legislative Affairs
OFPSM	Office of Facilities, Property and Safety Management
OHCM	Office of Human Capital Management
OIED	Office of Indian Economic Development
OIS	Office of Indian Services (General)/BIA
OIT	Office of Information Technology
OJS	Office of Justice Services (General)/BIA
OPA	Office of Public Affairs
PERF	Performance Management/OBPM
PROP	Personal Property Management/OFPSM
RACA	Office of Regulatory Affairs & Collaborative Action
RPL	Real Property & Leasing/OFPSM
SELFD	Self-Determination/OIS
SELFG	Office of Self-Governance
STRAT	Office of Strategic Partnerships
TRANS	Transportation/OIS
TRUS	Office of Trust Services (General)/BIA