

INDIAN AFFAIRS MANUAL

Part 5

Management Accountability

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1.1 Purpose. This chapter establishes the policy, authorities, and responsibilities for Indian Affairs' (IA) Management Accountability Programs, including Single Audit oversight, Internal Control and the Annual Assurance Statement, and the audit management programs.

1.2 Scope. This policy applies to programs and offices under the authority of the Assistant Secretary-Indian Affairs (AS-IA), including AS-IA offices, the Bureau of Indian Affairs (BIA), the Bureau of Indian Education (BIE), and the Bureau of Trust Funds Administration (BTFA).

1.3 Policy. It is the policy of IA to comply with all applicable Federal laws and regulations, and Department of the Interior (DOI) policies and procedures regarding Single Audit oversight, internal control review and management assurance, and audit management.

1.4 Authority.

A. Statutes and Regulations.

- 1) P.L. 93-638, Indian Self-Determination and Education Assistance Act (ISDEAA) of 1975
- 2) P.L. 95-452, Inspector General Act of 1978 ("OIG Act")
- 3) P.L. 97-255, Federal Managers' Financial Integrity Act (FMFIA) of 1982
- 4) P.L. 101-576, Chief Financial Officers Act of 1990 ("CFO Act")
- 5) P.L. 104-208, Federal Financial Management Improvement Act (FFMIA) of 1996
- 6) P.L. 104-156, Single Audit Act Amendments of 1996
- 7) 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

B. Guidance.

- 1) Office of Management and Budget (OMB) Circular A-50, Audit, Inspection, or Evaluation Follow-up
- 2) OMB Circular A-123, Management's Responsibility for Internal Control
- 3) U.S. Government Accountability Office (GAO) Standards for Internal Control in the Federal Government (the Green Book)

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- 4) 110 Departmental Manual (DM) 8, Organization: Office of the Assistant Secretary – Indian Affairs
- 5) 340 DM 1, Management Accountability and Control – General Policy and Responsibilities
- 6) 355 DM 2, Policy for Investigating Complaints and Referrals
- 7) 360 DM 1, Departmental Audits – Audit Authority, Policy, and Responsibilities
- 8) 361 DM 1, Audit Follow-Up – General Audit Follow-Up Responsibilities

C. Handbooks.

- 1) DOI Financial Management Handbook, Chapter 4, Internal Control Requirements Guidance
- 2) DOI Financial Management Handbook, Chapter 5, Audit Follow-Up Guidance and Departmental Goals for Implementation of Audit Recommendations

1.5 Responsibilities.

- A. **Assistant Secretary - Indian Affairs (AS-IA)** is responsible for establishing and maintaining effective internal control systems that establish and achieve specific internal control objectives to provide reasonable assurance that programs achieve their goals and objectives, and that business processes operate efficiently and effectively, comply with applicable laws and regulations, safeguard federal assets, and produce reliable financial and performance information. Each fiscal year, AS-IA provides reasonable assurance that IA's internal control over operations, reporting, and compliance are operating effectively as of September 30.

AS-IA is also responsible for facilitating and promoting a culture of integrity and management accountability, ensuring that IA: participates and responds to internal and external audits, investigations, and reviews; responds to investigative reports and corrects and monitors deficiencies when discovered; implements recommendations as agreed; and implements a quality assurance process to review and improve internal controls on an ongoing basis.

- B. **Principal Deputy Assistant Secretary (PDAS), Deputy Assistant Secretary – Policy and Economic Development (DAS-PED), Deputy Assistant Secretary – Management (DAS-M), Principal Director for Justice Services and Law**

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Enforcement (PDJLE), and Bureau Directors are responsible for establishing and maintaining effective internal control systems that achieve specific internal control objectives to provide reasonable assurance that programs achieve their goals and objectives, and that business processes operate efficiently and effectively, comply with applicable laws and regulations, safeguard federal assets, and produce reliable financial and performance information for their respective organization. Specifically, they are also responsible for:

- 1) Ensuring that key program and operational controls are developed, implemented, and functioning as intended;
- 2) Assigning resources and ensuring the completion of internal control assessments and reviews in order to provide annual assurance certifications to the AS-IA;
- 3) Disclosing control weaknesses, and ensuring required corrective action plan development and implementation;
- 4) Assigning program and operational staff and working with Tribal recipients and grants to ensure Single Audit compliance and completion of management decisions on Single Audit findings and recommendations; and
- 5) Assigning program and operational staff and working with internal and external auditors to respond to audits, investigations, and internal control reviews in a timely and effective manner, including implementing corrective action plans and audit recommendations.

C. **Deputy Assistant Secretary – Management (DAS-M)** is responsible for issuing policy and general oversight related to administrative, management accountability management, and financial management within IA.

D. **Chief Financial Officer (CFO), IA** is responsible for advising the AS-IA, PDAS, DAS-PED, PDJLE, DAS-M, and Bureau Directors, on audit management and internal controls and evaluation results through IA's management accountability governance; and directing the Office of Chief Financial Officer (OCFO) resources to ensure effective and efficient audit management and internal control programs; overseeing annual internal control assessments; and developing the AS-IA assurance statement in accordance with all laws, regulations, and guidance as outlined in section 1.4 above.

The CFO serves as IA's Audit Liaison Officer (ALO) and is responsible for overseeing all follow-up activities for audits, investigations, and attestation engagements conducted by the Office of Inspector General (OIG), the Government Accountability Office (GAO), and other external auditors. The ALO is also responsible for IA's Single Audit Act oversight responsibilities.

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- E. Director, Division of Internal Evaluation and Assessment (DIEA), OCFO** is responsible for providing management of IA's audit management and internal control programs, supporting the CFO to establish and meet the goals and objectives for each program, and providing training and advise to officials through IA's management accountability governance and standard operations. The DIEA Director is also responsible for planning and implementing IA guidance, coordinating daily staff activities, and ensuring effective processes are established and followed for each program.
- F. IA Audit Coordinator** is appointed by the IA CFO and is responsible for carrying out all audit follow-up responsibilities in accordance with all laws, regulations, and guidance as outlined in section 1.4 above. The Audit Coordinator maintains IA's OIG and GAO audit tracking process and is responsible for monitoring and reporting the status of on-going open audits and the implementation of audit recommendations on a continual basis.
- G. IA OIG Investigation Status Coordinator** is appointed by the IA CFO and is responsible for tracking, monitoring, and reporting the status of OIG investigations referred to IA on a continual basis.
- H. IA Program Management and Offices** are responsible for implementing audit and investigation follow-up and control activities for their responsible programs and operations that facilitate effective and efficient use of resources and achieving program and operational results, including the following:
- 1) Developing and following operational policies and procedures, and implementing process improvements to improve internal controls;
 - 2) Working with Tribes on their submissions of required Single Audit reports annually, and issuing management decisions on Single Audit report findings and recommendations timely and effectively; and
 - 3) Participating in GAO and OIG audits and investigations to provide timely and complete data and responses for requests, and to draft management responses to GAO and OIG audit and investigation findings and recommendations.

1.6 Standards, Requirements, and Procedures.

IA's management accountability programs include GAO audit management, OIG audit and investigation management, Single Audit oversight, and internal control and management assurance. The OCFO develops and implements IA policies, procedures, and guidance and coordinates with departmental offices and IA bureaus and offices. The OCFO's coordination supports effective and timely audit management and an effective and efficient internal control program. The OCFO's program functions include the following:

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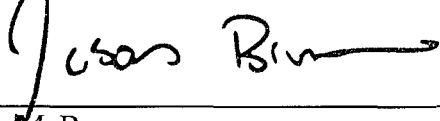
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- A. Providing guidance, advice and assistance to ensure IA organizations implement and comply with internal control guidelines established by departmental offices and other Federal oversight agencies such as OMB and GAO. This includes issuing annual internal control guidance, developing annual review plans, conducting internal control reviews and assessments, evaluating program and operational deficiencies, and developing the AS-IA's Entity Level Control Assessment and Annual Assurance Statement.
- B. Providing guidance, advice and assistance to IA organizations on the Single Audit Act and 2 CFR 200 and overseeing and reporting on the compliance of financial audits of Tribal recipients and grantees in accordance with the IA and Department policies, OMB guidance, regulations, and ISDEAA, Single Audit Act and OIG Act.
- C. Conducting internal financial and program reviews to ensure that programs achieve their intended results, resources are used consistently with the IA mission and are protected from waste, fraud, and mismanagement, and are compliant with applicable laws, regulations, and policies.
- D. Coordinating GAO and OIG audits and engagements, providing guidance and reviewing management responses to audits, and tracking and reporting on the audit-follow up requirements from inception to completion, including, resolution and implementation of all audit findings recommendations.
- E. Tracking, monitoring, and reporting the status of OIG investigations referred to IA.

Approval



8/28/26

Jason M. Bruno
Deputy Assistant Secretary – Management

Date