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**Tribal Participation in the Bureau of Indian Affairs Budget System Should Be Improved.** CED-78-62; E-114868. February 15, 1978. Released February 27, 1978. 25 pp. + 3 appendices (6 pp.).

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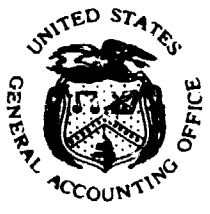
The degree to which the Bureau of Indian Affairs' (BIA's) budget reflects tribal needs and priorities depends on the extent of effective tribal involvement. Tribal participation and effective tribal input in BIA's fiscal year 1979 funding decisions varied from total involvement to no involvement at all. Therefore, BIA's fiscal year 1979 budget represents some, but not all, tribal funding priorities. Findings/Conclusions: Participation or effective input by some tribes was limited because BIA: did not give the tribes needed funding data and information to identify all programs and funding sources, did not identify funds for trust responsibilities and essential services that could not be eliminated, varied the programs subject to direct tribal input, imposed a severe time constraint on the tribes for identifying funding priorities, did not give some tribes an opportunity to participate or limited tribal input to review and comment, and did not give tribes an opportunity to participate in developing new programs and making major revisions to existing programs. The conditions that limited participation in the 1979 budget will again limit tribal participation in developing the fiscal year 1980 budget. Recommendations: The Assistant Secretary of the Interior for Indian Affairs should: give the tribes complete funding data and information, inform the tribes of the exact amount of funds available to change the mix of programs and funding priorities, narrow the criteria for excluding a program from the funding priority-setting process, give the tribes more time to develop program-funding priorities, revise procedures and requirements for setting program-funding priorities to make sure that tribal officials are given an opportunity to identify their priorities, and give the tribes an opportunity to participate in developing new programs and making major revisions to existing programs.

(BRS)

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**REPORT OF THE  
COMPTROLLER GENERAL  
OF THE UNITED STATES**

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**Tribal Participation In The  
Bureau Of Indian Affairs Budget  
System Should Be Increased**

Tribal participation in the Bureau of Indian Affairs fiscal year 1979 budget system and program funding decisions varied. Therefore, the budget represents some, but not all, tribal funding priorities.

The Bureau has proposed a new process for setting funding priorities. It will build on and modify, rather than replace, the current budget process. However, conditions will again limit tribal participation in developing the fiscal year 1980 budget.

Major improvements are needed in the Bureau's system to increase tribal participation so that the budget will reflect tribal needs and priorities.



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

B-114368

The Honorable Robert C. Byrd, Chairman  
Subcommittee on the Department of  
Interior and Related Agencies  
Committee on Appropriations  
United States Senate

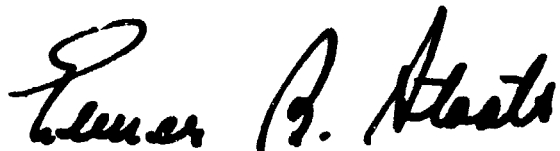
Dear Mr. Chairman:

This is one of a series of reports in response to your request of August 9, 1977, asking us to make a comprehensive review of the Bureau of Indian Affairs programs and processes. This report presents the results of our evaluation of tribal involvement in the Bureau's budget system and funding decisions and shows that the opportunity for tribal participation and input in developing the Bureau's fiscal year 1979 budget was limited.

In accordance with a request from your office, we have not obtained written agency comments. However, we have informally discussed our findings with agency officials. Their comments have been considered.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

  
Comptroller General  
of the United States

COMPTROLLER GENERAL'S REPORT  
TO THE SUBCOMMITTEE ON THE  
DEPARTMENT OF INTERIOR AND  
RELATED AGENCIES, SENATE  
COMMITTEE ON APPROPRIATIONS

TRIBAL PARTICIPATION IN THE  
BUREAU OF INDIAN AFFAIRS  
BUDGET SYSTEM SHOULD BE  
INCREASED

D I G E S T

The Bureau of Indian Affairs fiscal year 1979 budget represents some, but not all, tribal funding priorities. This is because participation by Indian tribes in the budget system and program funding decisions varied. The Bureau:

- Did not give the tribes needed funding data and information to identify all Bureau programs and other available Federal funding sources. (See pp. 8 and 9.)
- Did not identify funds for trust responsibilities and essential services that could not be eliminated. (See p. 9.)
- Varied the programs subject to direct tribal input, which affected predictability and hindered tribal budgeting. (See pp. 10 and 11.)
- Imposed a severe time constraint on the tribes for identifying funding priorities. (See p. 11.)
- Did not give some tribes an opportunity to participate or limited tribal input to review and comment. (See pp. 11 to 13.)
- Did not give the tribes an opportunity to participate in developing new programs and making major revisions to existing programs. (See p. 13.)

Moreover, the Bureau provided the tribes inadequate information for evaluating program performance and managerial effectiveness. (See p. 15.)

The effectiveness of the Bureau's budget system depends on knowing tribal needs and their relative priorities. However, the Bureau has stopped allocating funds specifically for

comprehensive tribal planning and needs analysis. Instead, funds are allocated for self-determination grants and training and technical assistance to increase the tribes' ability to contract and strengthen their managerial capabilities. Many tribes have not developed comprehensive plans or identified their needs. (See pp. 18 and 19.)

The Bureau has proposed to develop the fiscal year 1980 budget, to the maximum extent possible, on location. It will build on and modify, rather than replace, the current budget process. However, conditions that limited tribal participation in developing the Bureau's fiscal year 1979 budget will again limit tribal participation in developing the fiscal year 1980 budget.

RECOMMENDATIONS TO THE  
SECRETARY OF THE INTERIOR

GAO recommends that the Secretary of the Interior have the Assistant Secretary for Indian Affairs:

- Give the tribes complete funding data and information.
- Inform the tribes of the exact amount of funds actually available to change the mix of programs and funding priorities.
- Narrow the criteria for excluding a program from the funding priority-setting process and for not assigning program funds to the tribes for priority setting.
- Give the tribes more time to develop program-funding priorities and an opportunity to revise their priorities due to changing conditions.
- Revise the procedures and requirements for setting program-funding priorities to make sure that tribal officials are given an opportunity to identify their priorities.
- Give the tribes an opportunity to participate in developing new programs and making major revisions to existing programs.

- Determine how the Bureau's Planning, Programming and Evaluation Data System can be improved to better evaluate program performance and managerial effectiveness.
- Identify the number of Indian tribes and Alaskan Native groups requiring planning assistance, inform the tribes concerning the benefits to be derived from comprehensive plans and needs analyses, and give funding priority to tribal requests for comprehensive planning assistance.
- Reflect tribal funding priorities in the Bureau's budget.

FORMAL REVIEW AND  
COMMENTS NOT OBTAINED

At the request of the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, GAO did not submit this report to the Department of the Interior for formal review and comments. However, responsible agency officials were provided copies of the report and their informal comments have been considered.

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#### ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office
OMB	Office of Management and Budget
ZBB	zero-base budgeting



## CHAPTER 1

### INTRODUCTION

On August 9, 1977, the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, requested that we make a comprehensive review of Bureau of Indian Affairs (BIA), Department of the Interior, programs and processes and report the results to him by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our evaluation of tribal participation and input in BIA's budget system and funding decisions.

Participation in the executive budget formulation process has been a general issue for many years. Many Federal departments and agencies have some means of involving representatives of the beneficiary or regulated groups in the early stages of developing the budget and advising them of the final funding amounts included in the President's budget.

In the case of tribal participation there has been intense pressure, especially in recent years. This issue has gone far beyond the normal bounds and is now a very volatile policy matter. Agreements reached are only tentative since the issue is automatically opened again each year as a new budget formulation starts.

### DEVELOPMENT OF TRIBAL PARTICIPATION

The Indian Reorganization Act of 1934 (25 U.S.C. 461, 476) requires the Secretary of the Interior to advise Indian tribes of all appropriation estimates or projects benefitting them before submitting such estimates or projects to the Office of Management and Budget (OMB) or the Congress. However, BIA continued to develop its fiscal year budgets at the central office with little area office and agency input and no opportunity for tribal participation until 1970.

From 1934 to 1970, Federal Indian policy oscillated between two extremes--forced termination of the Federal trust relationship and constant paternalism and excessive Indian dependence on the Federal Government. As recently

as 1953, the Congress declared that termination was the long-range goal of its Indian policies. However, in a message to the Congress on July 8, 1970, the President rejected termination in favor of a self-determination policy.

Tribal participation in developing BIA's budget was stressed in August 1970. Agency superintendents were instructed to coordinate their efforts in developing BIA's fiscal year 1973 budget with the tribes. Enactment of the Indian Self-Determination and Education Assistance Act of 1975 (25 U.S.C. 450) served to highlight and emphasize tribal participation and input in BIA's budget system.

### BAND ANALYSIS

The process used since 1970 to provide opportunity for tribal participation in BIA's budget system and program funding decisions is called "band analysis." This process gives tribal officials an opportunity to set funding priorities among many of BIA's operational programs at constrained funding levels. Fiscal year appropriations for these programs should be allocated on the basis of funding priorities identified by the tribes through band analysis.

The term band analysis derived from the design of the form used to list tribal funding priorities. (See app. I.) The form shows the priorities for BIA's programs at constrained funding levels arranged in columns or "bands."

Band analysis forms are prepared for each of BIA's 82 agencies and 12 area offices as well as for other specialized field installations. Agencies, which generally report to an area office, are responsible for BIA's day-to-day contact with one or more tribes. Tribal participation and input in BIA's budget system are greatest at the agencies. Tribal officials may prepare the band analysis and develop a fiscal year financial program plan at their respective agencies.

Area offices are responsible for all BIA activities within their geographical jurisdictions, including functions and programs that can be conducted most efficiently and economically on an areawide basis. Tribal officials may prepare the band analysis for their respective area offices and identify proposals for programs not included on either the agency or area office band analysis (nonbanded programs).

BIA's central office consolidates, without substantive alterations, the area, agency, and other field location band analyses and should include identified tribal funding priorities in BIA's fiscal year budget estimates and justifications.

Band analysis is not intended to increase BIA's fiscal year appropriation; rather, it is intended to change the mix of programs within the appropriation according to individual tribal needs and funding priorities. Although changes to the program mix are usually moderate, tribes may drastically reduce or even eliminate an ineffective or low-priority program. However, BIA officials are responsible for assuring that adequate funds are available for required Federal trust responsibilities and essential BIA services.

According to a BIA official, fiscal year 1976 marked the turning point for band analysis. Fiscal year 1976 appropriations were allocated to the area offices and agencies after considering tribal funding priorities developed in fiscal year 1974. Previously, fiscal year appropriations had been set on the basis of prior year's history and administrative determinations. Also during fiscal year 1976, program funding priorities identified in the band analyses developed in fiscal year 1975 were used to change the mix of programs in the fiscal year 1977 budget estimate and budget justification.

#### BAND ANALYSIS AND THE NATION'S GOAL OF INDIAN SELF-DETERMINATION

In the Indian Self-Determination and Education Assistance Act of 1975 (25 U.S.C. 450) the Congress declared

" \* \* \* its commitment to the maintenance of the Federal Government's unique and continuing relationship with and responsibility to the Indian people through the establishment of a meaningful Indian self-determination policy which will permit an orderly transition from Federal domination of programs for and services to Indians to effective and meaningful participation by the Indian people in the planning, conduct, and administration of those programs and services."

BIA currently provides two principal opportunities for tribes to pursue self-determination through greater self-government. One opportunity is the provisions of the act

that permit tribes to plan, conduct, and administer all or any portion of a BIA program or service. The other opportunity for a tribe to exercise a degree of self-government is by setting funding priorities among programs in band analysis.

BIA describes band analysis as a step toward a general transfer of authority and responsibility from the Federal Government to Indian tribal governments. According to BIA documents, the process (1) fosters Indian self-determination by giving tribes an opportunity to participate in planning programs operated for their benefit and (2) facilitates tribal operation of BIA programs by allowing tribes to allocate BIA resources to programs or services they intend to conduct or administer through contract.

### BANDED AND NONBANDED PROGRAMS

Legislative and executive actions and court decisions establish responsibilities (nonbanded programs) that neither BIA nor the tribes can trade off against other programs. The Assistant Secretary for Indian Affairs has the final decision concerning which of the remaining programs will be banded for a given fiscal year. However, BIA has developed general criteria for not banding a program. (See app. II.) BIA also obtained tribal comments on which programs should be banded in the fiscal year 1979 budget.

BIA's fiscal year 1979 appropriation request is about equally divided between banded and nonbanded programs. Of the about 50 percent that is banded, approximately 70 percent was banded at the agencies while the remaining 30 percent was banded by the area offices.

In general, programs operated by an area office in a given year will be banded at the area office the following year. Area banded programs usually do not relate to any one agency. For example, boarding schools are on area office band analyses because the children attending them do not come from the tribes within one agency's jurisdiction.

### CRITERIA FOR ALLOCATING FUNDS AMONG AREA OFFICES AND AGENCIES

Before the band analysis process was used, program funds were allocated among the agencies and area offices usually on the basis of some program-oriented criteria. A location's total funding level should have also been adjusted to meet legislatively and judicially mandated

responsibilities and special needs, such as funds to operate a new school. Nonbanded program funds are still allocated in this manner.

Funds for banded programs were first allocated to each agency and area office on the basis of funds available for similar programs in the previous year. In later years, allocations of banded program funds to the agencies and area offices continued to be made on the basis of previous years. For fiscal year 1977, BIA made a somewhat different allocation of banded program funds based on equity formulas developed by the Bureau at the direction of OMB.

BIA has provided a funding percentage preference to agency programs as compared to area office programs in developing the fiscal year 1979 budget. Fiscal year 1979 funds will be allocated to the agencies and area offices on the basis of these percentages. The percentage preference shown to the agencies is to favor programs under the direct control of the tribes. This should encourage the area offices to assign more program funds to the agencies for band analysis, thereby increasing the agencies' proportionate share of funding.

When a program is added to the band analysis, the initial allocation of funds among agencies and area offices is based on the previous year's amount unless a specific formula has been developed by BIA or is required by a legislative or executive action or court decision. BIA has no procedure for establishing a band analysis base year funding total for a newly recognized tribe. However, a new tribe may be funded from nonbanded program funds or through a supplemental appropriation for the first year.

#### SCOPE OF REVIEW

Our review was made primarily to determine the extent of tribal participation and input in developing BIA's fiscal year 1979 budget and how BIA's budget system can be improved.

We reviewed BIA's policies relating to tribal involvement in BIA's funding decisions and instructions and guidelines for obtaining tribal participation and input into developing the fiscal year 1979 budget. We also evaluated BIA's proposal to develop the fiscal year 1980 budget, to the maximum extent possible, on location rather than on a program-by-program basis.

To verify the accuracy of BIA's summary of tribal input in the fiscal year 1979 budget, we interviewed officials and

obtained documentation at BIA's central office in Washington, D.C.; three BIA area offices (Phoenix, Portland, and Navajo); three BIA agencies (Pima, Western Washington, and Eastern Navajo); and four Indian tribes (Gila River, Puyallup, Lummi, and Navajo). We also obtained, verified, and updated findings in other reports on the effectiveness of band analysis.

At the conclusion of our work, we informally discussed our findings with responsible Department of Interior officials. Their comments have been considered.

## CHAPTER 2

### TRIBAL PARTICIPATION AND INPUT

#### IN BIA'S BUDGET SYSTEM VARIED

The degree to which BIA's budget reflects tribal needs and priorities depends on the extent of effective tribal involvement. However, tribal participation and effective tribal input in BIA's fiscal year 1979 funding decisions varied from total involvement to no involvement at all. Therefore, BIA's fiscal year 1979 budget represents some, but not all, tribal funding priorities. Participation or effective input by some tribes was limited because BIA

- did not give the tribes needed funding data and information to identify all Bureau programs and other available Federal funding sources;
- did not identify funds for trust responsibilities and essential services that could not be eliminated; therefore, the amount of funds actually available to the tribes to change the mix of programs and funding priorities was not known;
- varied (1) the programs included on the band analysis from those in prior years and (2) the funds assigned to the agencies for band analysis, affecting predictability and hindering tribal budgeting;
- imposed a severe time constraint on the tribes for completing the agency band analyses;
- developed some band analyses without giving the tribes an opportunity to participate or limiting tribal input to review and comment;
- prepared "joint" instead of "split" band analyses at some multitribal agencies even though agency funds could have been divided among the tribes;
- had not established systematic procedures for obtaining tribal input in nonbanded program proposals prepared yearly by the area offices for new programs and major revisions to existing nonbanded programs;

- did not give the tribes explanatory information or justification for major adjustments to the band analyses (1) resulting from the Federal budgetary process and (2) made after the fiscal year appropriations had been allotted; and
- did not present the budget formulation and program planning workshop to the tribes in some agencies or otherwise familiarize tribal officials with the Federal budgetary process and their ability to affect the allocation of BIA resources.

Moreover, BIA's data system, developed to measure program accomplishments, provided the tribes inadequate information for evaluating program performance and managerial effectiveness.

#### TRIBES NOT GIVEN NEEDED FUNDING INFORMATION

BIA expects tribal officials to have a good understanding of all the funding sources available to the tribe, including all Bureau programs and other available Federal benefits. However, BIA did not give the tribes complete funding data and information on (1) each agency's share of area office and central office programs and (2) other available Federal benefits and services.

Funding data and information on an agency's share of area office banded programs are not given to the tribes before the agency band analyses are prepared. Area band analyses (1) are prepared by the area offices concurrent with or after the agency band analyses and (2) do not always identify services and funding by agency or tribe. Similarly, area office and central office nonbanded programs and new program proposals do not always identify which agencies and tribes will receive or benefit from the services provided. Without this funding data and information tribes cannot determine what tribal needs and priorities will be met with area office and central office funds.

The Indian Reorganization Act of 1934 (25 U.S.C. 461, 476) requires the Secretary of the Interior to advise Indian tribes of all appropriation estimates or projects benefitting them before submitting such estimates or projects to OMB or the Congress. BIA requests this information from other Federal departments and agencies twice a year; by September, based on OMB's target planning allowance and by January, based on the President's budget. BIA assembles the responses and forwards them to the tribes. However, most of the



Federal departments and agencies that respond do not maintain records identifying services provided to particular groups, such as Indian tribes. Therefore, the information is incomplete and does not reflect all services and benefits that will ultimately be available to each tribe.

Some Federal departments, such as the Department of Health, Education, and Welfare, that provide direct services and benefits to the tribes, did not respond to the BIA requests. Other departments, such as the Department of Housing and Urban Development, responded but did not provide the program information and funding totals by tribe. Also, BIA has not developed a standard format for obtaining the information and providing it to the tribes in a usable form. Without this information, the tribes cannot determine what tribal needs and priorities will be met through other Federal benefits and services.

Complete funding data and information on (1) each agency's share of area office and central office programs and (2) other available Federal benefits and services would be invaluable to the tribes in preparing the agency band analyses.

#### FEDERAL TRUST RESPONSIBILITIES AND ESSENTIAL SERVICES ARE NOT IDENTIFIED

Unlike other Federal departments and agencies, BIA must carry out Federal trust and legal responsibilities to protect the rights of Indians and to give them the services they require. BIA's trust responsibilities and other essential services permeate all of its budget activities and many of its programs.

During the fiscal year 1979 band analysis process, each agency superintendent was instructed to review the agency band analysis to assure that all activities required by Federal trust responsibilities and services that BIA could not eliminate were funded at an "unavoidable minimum amount." However, funds relating to these trust responsibilities and services could not be readily identified. Therefore, the amount of funds actually available to the tribes to change the mix of programs and funding priorities was not known.

BIA should identify the funds relating to its trust responsibilities and services that cannot be eliminated so that remaining agency funds actually available to the tribes to change program mix and funding priorities would be known.

TRIBAL BUDGETING HINDERED BY VARYING  
PROGRAMS SUBJECT TO BAND ANALYSIS

Programs included on BIA's band analysis vary from year to year. Thus, the programs selected for band analysis are unpredictable. This has hindered the tribes' ability to perform effective program planning and budgeting. Further, BIA's goal is to increase the number and type of programs and related funding subject to band analysis. This has not happened. About 53 percent of the fiscal year 1976 appropriation for operating Indian programs was subject to band analysis compared to about 50 percent of BIA's proposed fiscal year 1979 appropriation.

Criteria for excluding a program from band analysis were developed in February 1976. (See app. II.) However, the criteria are so open to interpretation that some BIA programs are excluded for other reasons.

Before developing the fiscal year 1979 BIA budget, the tribes were given an opportunity to provide input into which programs would be included on the band analysis. Based in part on comments from the tribes, agencies, and area offices, three programs (tribal courts, law enforcement, and self-determination grants) were added to the fiscal year 1979 band analysis. One program, add-ons to Johnson O'Malley base funds for supplemental aid to public schools, was removed because the base funds for each agency could not be provided prior to the band analysis process.

When a program is removed from the band analysis, an agency's band analysis funding base is reduced by the amount of funds in that program. Not only does this reduce the tribes' opportunities for trade-offs among banded programs, it also reduces the agency's funding base for band analysis in future years. The tribes have no guarantee that they will receive comparable nonbanded funding for a program removed from the band analysis.

Programs included on the area office band analysis usually do not relate to any one agency. However, area offices do not assign the same program funds to the agencies for band analysis. (See app. III.) Thus, the amount of program funds available to a tribe to change an agency's program mix varies from area office to area office.

Since the opportunity for tribal participation and input is greatest at the agencies, BIA's goal should be to increase the amount of program funds subject to agency band

analysis. BIA should narrow the criteria for excluding a program from band analysis and for not assigning banded program funds to the agencies.

#### SEVERE TIME CONSTRAINT IMPOSED

Instructions and forms for developing the fiscal year 1979 agency band analyses were given to the tribes in late May or June 1977. The completed band analyses were due in the BIA central office by July 1, 1977. Typically, the fiscal year 1979 agency band analyses were developed in 2 or 3 weeks during which time several meetings were held between agency personnel and tribal officials. Both agency personnel and tribal officials agreed that the time provided to prepare the agency band analyses was inadequate to evaluate the effect each of the constrained funding levels would have on agency banded programs.

BIA should give the tribes more time to complete the agency band analyses so that tribal officials can evaluate the effect each of the constrained funding levels will have on agency banded programs.

#### INVOLVEMENT BY SOME TRIBES IN BAND ANALYSES WAS LIMITED

Agency band analyses should be the most representative summation of what each tribe has determined it requires to meet its needs. Agency band analyses should be developed through direct participation and input by tribal officials with only technical assistance provided by BIA agency and area office personnel.

Involvement by some tribes in developing the fiscal year 1979 agency band analyses was limited. In some instances a tribe or tribes at an agency made a conscious decision not to participate in the process. In other instances effective tribal participation was precluded because the band analysis was developed by BIA agency personnel with tribal input limited to review and comment. For example, the superintendent of a multitribal agency included in our review made a unilateral decision to limit tribal participation to review and comment on the fiscal year 1979 band analysis prepared by BIA agency personnel. He based his decision primarily on an anticipated reaction by some tribes if the actual funding distribution among the tribes was known.

On the basis of OMB recommendations in a report dated July 1975, BIA instructed every agency superintendent to

(1) prepare a report on tribal participation in the fiscal year 1979 band analysis process and (2) obtain the signature of a responsible official from every tribe on the completed band analysis or secure an approving tribal resolution. However, approximately one of every four agency band analyses prepared for fiscal year 1979 was not approved by one or more tribes within that agency, and some superintendents did not complete the required report on tribal participation. Also, the extent to which BIA agency personnel prepared the band analyses for the tribes could not be identified from the reports.

According to BIA officials, the more tribes one agency serves, the more difficult it is to serve individual tribal priorities. BIA officials stated that it is particularly difficult when an agency serves four or more tribes or when an agency's budget is dominated by one or several large tribes. Dividing program funds among the tribes is meaningless when the amounts are so small that the tribes have no real leeway for trade-offs among programs or have no alternative other than jointly funding needed services.

Recognizing this problem, BIA has delegated to superintendents of agencies serving four or more tribes the responsibility of deciding the feasibility of dividing agency funds among the tribes (split bands) depending on the situation at each agency. However, by not requiring each superintendent to offer the tribes the option of preparing split bands or to justify the decision to prepare a joint (single) band analysis, some tribes in multitribal agencies where split bands were feasible were not given the opportunity to identify their relative priorities.

Of the 28 agencies serving 4 or more tribes, only 7 prepared split band analyses for fiscal year 1979. Some of the multitribal agencies where a joint band analysis was prepared could have split funds among the tribes. BIA instructed superintendents of agencies serving two or three tribes to divide funds among the tribes if the tribes so chose. However, superintendents were not required to document that the option of preparing a split band analysis was actually offered to and discussed with the tribes or to justify the decision to prepare a joint band analysis. Only 5 of the 17 agencies serving 2 or 3 tribes prepared split band analyses for fiscal year 1979.

Area band analyses comprise about 30 percent of the total funds banded for fiscal year 1979. The fiscal year 1979 instructions directed the area offices to develop the

area band analyses according to the procedures established for agencies serving four or more tribes. However, of the 12 area offices, only 5 provided the tribes an opportunity for input before preparing the area band analysis. Three area offices developed the area band analysis without tribal involvement, while the remaining four solicited tribal review and comment only after the analysis had been prepared. As a result, tribal participation and input into area office band analyses were limited. The statement in BIA's fiscal year 1979 budget estimate that area band analyses were developed "with direct tribal participation" is, therefore, an overstatement.

Tribes should participate and provide effective input in both agency and area office band analyses so that BIA's budget will reflect tribal needs and funding priorities.

#### TRIBAL PARTICIPATION IN NONBANDED PROGRAM PROPOSALS NOT REQUIRED

A BIA budget system that truly reflects tribal needs and priorities should include procedures to obtain tribal input in developing as many BIA programs as possible. However, a large percentage of BIA's fiscal year 1979 budget was not subject to tribal participation or effective tribal input.

Nonbanded programs comprise about 50 percent of BIA's fiscal year 1979 estimated appropriation. However, BIA has not established systematic procedures for obtaining tribal input in nonbanded program proposals prepared yearly by the area offices for all new programs and major revisions to existing nonbanded programs. Therefore, tribal involvement varied at the discretion of each area office.

BIA should give the tribes an opportunity to participate in developing new programs and making major revisions to existing nonbanded programs.

#### ADJUSTMENTS TO THE BAND ANALYSES NOT EXPLAINED TO THE TRIBES

Adjustments are made to BIA's budget as it proceeds through the Federal budgetary process. For example, for fiscal year 1977 three programs totaling about \$73.4 million were removed from the band analysis at the direction of OMB or the Congress. Also, BIA applied \$4 million of congressional reductions to banded programs. These adjustments upset tribal funding priorities.

BIA revised the allocation of fiscal year 1977 banded funds to reflect these adjustments. However, BIA did not give the tribes either explanatory information or justification for the adjustments to the band analyses and their impact on individual tribal funding priorities. A BIA official stated that a previous effort to explain the impact of adjustments on banded programs resulted in confusion and misunderstandings between the tribes and the Bureau. Therefore, BIA chose to avoid giving the tribes explanatory information or justification for adjustments to the band analyses.

Major adjustments to an agency's total funding base also occur after an initial allotment has been made in any given fiscal year. For example, during fiscal year 1977, obligations within a budget activity at a BIA area office exceeded funds allotted. The area office deobligated certain contracts within this activity, resulting in adjustments to agencies' funding bases. These adjustments are reflected in monthly status of obligations reports by agency and area office. However, these reports reflect aggregate changes in funding only. The tribes are not given either explanatory information or justification for major funding adjustments.

Tribal officials equate reductions in funds with ineffectiveness of band analysis. Thus the failure of BIA to keep the tribes adequately informed of major changes to banded program funds made during the Federal budgetary process and after the initial allotment of funds has been made undermines tribal confidence and discourages tribal participation in band analysis.

#### BUDGET PROCESSES NOT UNDERSTOOD BY TRIBAL OFFICIALS

To familiarize tribal officials with the Federal budgetary process in general and with Department of the Interior and BIA processes in particular, BIA developed a budget formulation and program planning workshop for use at the agencies as a preliminary step to the budget cycle. The workshops began in fiscal year 1974 and have continued to the present. However, the fiscal year 1979 workshop had been presented to only one of the four tribes we visited.

A management study for the American Indian Policy Review Commission found that tribal officials are uninformed regarding budget concepts and their ability to make changes through band analysis. The Commission concluded that the workshop is apparently not communicating the budget process clearly to the tribes. In our discussions, some tribal officials

voiced dissatisfaction with previous years' budget workshops. Our discussions also indicated that BIA has not prepared some tribal officials to participate in the band analysis process.

ADEQUATE INFORMATION ON PROGRAM  
ACCOMPLISHMENTS NOT AVAILABLE

Band analysis requires setting funding priorities among programs. If a tribe has identified its needs, tribal officials still cannot set funding priorities until they know how effective each existing program has been in meeting established objectives. However, BIA's Planning, Programming and Evaluation Data System, developed to measure program accomplishments at each agency, (1) includes only a limited number of measurements, (2) is reviewed and reported on separately from band analysis, and (3) does not provide the tribes with periodic checks and reports comparing work accomplishments with planned objectives. Therefore, the data system provides the tribes inadequate information for determining how effective each existing program has been in meeting established objectives.

BIA needs to determine how its Planning, Programming and Evaluation Data System can be improved to better evaluate program performance and managerial effectiveness.

LOCATION BUDGETING MAY NOT INCREASE  
TRIBAL PARTICIPATION

BIA has proposed to develop the fiscal year 1980 budget, to the maximum extent possible, on location (agency) rather than on the traditional program-by-program structure of the Federal budget. Location budgeting is designed to increase the number of programs and related funding subject to tribal funding decisions.

Although the term band analysis will not be employed, conditions that limited tribal participation and input in developing BIA's fiscal year 1979 budget will again limit tribal participation in developing the fiscal year 1980 budget, as presently proposed.

According to BIA officials, location budgeting will (1) result in a BIA budget that more closely represents tribal funding priorities, (2) allow tribal officials to select the most effective program mix to meet their unique situations,

and (3) permit tribes to make adjustments in fiscal year operations to recognize changing conditions.

Location budgeting will build on band analysis and will modify, rather than replace, the current process. Although the proposal is intended to maximize tribal involvement in BIA's budget system, tribal participation and input again will be limited primarily to agency programs. Tribal involvement in area office programs may be solicited; however, each area office has the option of limiting tribal input to review and comment on the proposed area budget. BIA's central office will prepare a consolidated Bureau budget consisting of staff operations and all programs. The budget should reflect the program funding priorities in the agency and area office budgets. Tribal input will again be limited to review and comment on the proposed BIA budget. The tribes may also be requested to offer suggestions on miscellaneous operating and construction program activities. Thus, the tribes will be given the same general opportunity to set funding priorities among programs at constrained funding levels.

#### CONCLUSIONS

Tribal participation and input in BIA's fiscal year 1979 funding decisions varied. Therefore, BIA's fiscal year 1979 budget represents some, but not all, tribal funding priorities. Also, conditions that resulted in limited tribal participation in developing BIA's fiscal year 1979 budget will again limit tribal participation in developing the fiscal year 1980 budget by location, as presently proposed. Major improvements are needed in BIA's budget system to increase tribal participation and input so that the budget will reflect tribal needs and priorities.

#### RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior have the Assistant Secretary for Indian Affairs:

- Give the tribes complete funding data and information on (1) each tribe's share of area office and central office programs and (2) other available Federal benefits and services.
- Identify the "unavoidable minimum amount" of funds by program necessary to maintain Federal trust responsibilities and services; BIA cannot eliminate



so that the tribes will know the exact amount of funds actually available to change the mix of programs and funding priorities.

- Narrow the criteria for excluding a program from the funding priority-setting process and for not assigning program funds to the agencies for priority setting. This may increase the number of programs and related funding subject to direct tribal input.
- Give the tribes more time to develop program-funding priorities.
- Revise the procedures and requirements for setting program-funding priorities to assure that tribal officials are given an opportunity to identify their priorities. This could be done by expanding the report on tribal participation to (1) identify the extent of tribal and BIA personnel involvement and (2) require agency superintendents to offer tribal officials the option of dividing program funds among the tribes.
- Give the tribes an opportunity to participate in developing new programs and making major revisions to existing programs not subject to direct tribal input.
- Inform the tribes of major changes to agency and area office program funding made (1) during the Federal budgetary process and (2) after the fiscal year appropriations have been allotted.
- Revise and expand the budget formulation and program planning workshop into a seminar to develop tribal skills and understanding of how the tribes participate in BIA's budget system and how this system relates to the Federal budgetary process.
- Determine how BIA's Planning, Programming and Evaluation Data System can be improved to better evaluate program performance and managerial effectiveness.

## CHAPTER 3

### NEED FOR TRIBAL COMPREHENSIVE

#### PLANS AND NEEDS ANALYSES

Before setting program-funding priorities, the tribes and BIA should know tribal needs and resources. The effectiveness of BIA's budget system depends on knowing tribal needs and their relative priorities. However, BIA has stopped allocating funds specifically for comprehensive tribal planning and needs analyses. Instead funds are allocated for self-determination grants and training and technical assistance to increase the tribes' ability to contract and strengthen their managerial capabilities. Many tribes have not developed comprehensive plans or identified their needs. This severely limits their ability to effectively participate in BIA's budget system.

Comprehensive tribal plans and needs analyses are also needed by BIA to (1) develop a formula on which to justify the allocation of funds among agencies and tribes and (2) develop a long-range plan to explore alternative budget concepts to achieve the Nation's goal of Indian self-determination.

#### FUNDS NOT ALLOCATED

A 1971 survey by area office of 177 Indian tribes and Alaskan Native groups showed that only 11 (6 percent) had documented comprehensive plans. On the basis of this identified need, an Office of Planning was established within BIA. This Office subsequently became the Division of Tribal Planning Services, which is responsible for providing staff leadership in developing, programing, and funding comprehensive plans reflecting individual tribal socioeconomic and other needs.

After enactment of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450) on January 4, 1975, most of the funds allocated for comprehensive tribal planning were transferred from the Division of Tribal Planning Services to the Division of Self-Determination Services. Once assimilated into the self-determination services base, the comprehensive planning funds lost their identity and are not allocated specifically for this purpose. Although self-determination grants and funds for training and technical assistance can be allotted to tribes for comprehensive

planning, they are provided primarily to increase the tribes' ability to contract and strengthen their managerial capabilities.

The Division of Tribal Planning Services retains primary responsibility for comprehensive tribal planning and needs analyses but lacks the financial support necessary to award new comprehensive planning contracts. The Division still supports two planning efforts--the Planning Support Group in Billings, Montana, and a 5-year comprehensive planning program contract with several tribes. However, the Planning Support Group does not provide overall comprehensive planning assistance to the tribes and its specialized services are available only to tribes in BIA's Juneau, Portland, Aberdeen, Billings, and Minneapolis area office jurisdictions. The 5-year comprehensive planning program contract with the tribes began in February 1974. Although the contract is entering its final year, there is concern that comprehensive plans will not be completed within the 5-year period.

The number of Indian tribes requiring comprehensive planning assistance has not been identified since the 1971 survey. However, BIA officials state that funds for comprehensive tribal planning available from other Federal departments and agencies, such as the Department of Housing and Urban Development and the Economic Development Administration, are not adequate to meet the comprehensive planning needs of the tribes.

#### TRIBAL NEEDS ANALYSES WOULD ASSIST BIA IN DEVELOPING A FORMULA TO ALLOCATE FUNDS

BIA has been criticized by OMB, the American Indian Policy Review Commission, and the tribes for its failure to develop a formula to assure the equitable allocation of funds among agencies and tribes. For fiscal year 1977, OMB made a \$10.93 million increase to banded programs contingent on the development of a means for assuring equity in the distribution of the funds among the tribes. Although executive and legislative actions reduced this amount to about \$0.6 million, BIA developed formulas and allocated 41 percent of the increase to 21 selected agencies.

For fiscal year 1978, OMB stated that the Department of the Interior should contract with a private consulting firm to make an analysis of the distribution of BIA funds among the tribes and submit a draft request for proposal

for review by the end of January 1977. The Department has not contracted with a consulting firm to make an equity analysis and never submitted a draft request for proposal to OMB. BIA made no equity adjustment among the tribes for fiscal year 1978 and does not intend to do so for fiscal year 1979.

Any equity funding allocation is dependent on the measures used to develop the formula(s). An equity formula for a program or group of programs based on a population measurement may result in an entirely different funding allocation than one based on per capita income or tribal income. Also, a funding allocation based on an equity measurement such as population may not recognize the special needs of an agency or tribe. Therefore, a formula that appears equitable to some tribes may be considered inequitable by others. GAO believes that accurate, current, and comparable comprehensive tribal needs analyses would provide BIA with a measurement to be considered in developing a formula on which to allocate Bureau funds.

#### NO LONG-RANGE PLAN TO EXPLORE ALTERNATIVE BUDGET CONCEPTS

BIA has not developed a long-range plan to explore alternative budget concepts to achieve the Nation's goal of Indian self-determination. Presently BIA's planning does not extend beyond 18 months.

A BIA long-range plan must allow tribes the option of exercising a greater measure of self-determination through greater self-government. Only after individual tribal plans and needs analyses have been identified, summarized, and analyzed can BIA develop a long-range plan and adopt a budget concept to reach an ultimate tribal self-government objective within a specified period of time.

GAO believes that the degree of planned tribal participation in the budget system will provide a framework for a BIA-wide budget. It will also provide an operating definition of the self-determination concept as applied to the role of tribal governments in funding decisions.

#### CONCLUSIONS

Comprehensive tribal plans and needs analyses would (1) increase the tribes' ability to effectively participate in BIA's budget system, (2) provide a measurement to be considered in developing a formula on which to justify the

allocation of BIA funds among agencies and tribes, and (3) provide a basis on which to develop a BIA long-range plan to explore alternative budget concepts to achieve the Nation's goal of Indian self-determination.

RECOMMENDATION TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior have the Assistant Secretary for Indian Affairs:

- Identify the number of Indian tribes and Alaskan Native groups requiring planning assistance, inform the tribes concerning the benefits to be derived from comprehensive plans and needs analyses, and give funding priority to tribal requests for comprehensive planning assistance.

## CHAPTER 4

### CHANGES NEEDED IN BIA'S BUDGET SYSTEM

The Federal budgetary process imposes a number of constraints on BIA's budget system. For the most part, these constraints are not unique to BIA but are the same as those imposed on other Federal departments and agencies. However, from a tribal standpoint, some Federal budgetary constraints are viewed as shortcomings in the band analysis process. These constraints include

- legislative and executive actions resulting in BIA adjustments to banded program funding that upset tribal priorities;
- the long lead time between preparing the band analyses and the initial allotment of funds together with the difficulty of reprogramming funds once allocated, making the system unresponsive to changing conditions; and
- requirements that limit BIA's ability to recognize the complex nature of Indian tribes.

Although BIA's budget must be developed within the Federal budgetary process, changes to BIA's budget system could help to minimize the adverse impact of these constraints on tribal funding priorities.

### JUSTIFIED TRIBAL PRIORITIES COULD REDUCE LEGISLATIVE AND EXECUTIVE ADJUSTMENTS

Legislative and executive actions can result in adjustments to banded programs or limiting the amount of funds available. For example, the President's fiscal year 1977 budget contained about a \$7.5 million increase for banded programs. However, OMB and the Congress set special funding levels and/or formulas for certain banded programs. Also BIA applied \$4 million of congressional reductions to banded programs. These actions reduced the fiscal year 1977 increase for banded programs to about \$0.6 million.

In all the budget decisions for fiscal year 1978, the Department of the Interior and OMB recommended changes only in the total funds for banded programs. However, the Congress instructed BIA to reduce its budgeted program support and administrative costs by over \$4 million. To implement this reduction BIA is charging a user fee to all programs requiring

automatic data processing services during fiscal year 1978. Reimbursement with banded program funds for a service previously supported with an administrative appropriation will reduce funds available for direct services in banded programs.

BIA officials stated that the Congress instructs the Bureau to make significant adjustments to banded programs without regard for the tribal priorities expressed in the band analyses. However, BIA has not assisted the Congress or OMB by reflecting tribal funding priorities by program or budget activity in the fiscal year budget justifications and estimates.

Contrary to present practice, BIA should reflect tribal funding priorities in its budget justifications and estimates.

#### BAND ANALYSES INFORMATION SHOULD BE UPDATED

The fiscal year 1979 band analyses were prepared on estimated funding data approximately 15 months in advance of the fiscal year. They were not revised to reflect changes in relative tribal priorities and program mix resulting from subsequent revisions to BIA's fiscal year budgets and changing conditions at the agencies and tribes occurring after June 1977.

BIA should give tribal officials an opportunity to update and revise the band analyses to reflect revisions to BIA's fiscal year budgets resulting from the Federal budgetary process and changing conditions at the agencies and tribes. If tribes were given an opportunity to update the band analyses, the need to reprogram funds during a given fiscal year due to changing conditions would be reduced.

#### BIA'S BUDGET SYSTEM COULD INCLUDE ALL FEDERAL BUDGETARY REQUIREMENTS

BIA officials state that the traditional program-by-program structure of the Federal budget fails to recognize the complex nature of Indian tribes and that problem solving among such complexities demands a disciplined, locally designed, and comprehensive approach. According to BIA officials, such an approach is frustrated by the present, rather rigid, program structure of BIA's budget. For this reason BIA has proposed to develop the fiscal year 1980 budget, to the maximum extent possible, by location. (See pp. 15 to 16.)

As proposed, location budgets can (1) include all the principal objectives of zero-base budgeting (ZBB) and (2) be consolidated by program for informational use in the Federal budgetary process. The existing BIA budget system includes some of the principal objectives of ZBB. The system (1) involves tribal officials as well as BIA agency and area office personnel, (2) requires tribal and/or BIA officials to consider programs at various funding levels, (3) requires narrative statements on the major impact (effects) of the various funding amounts, (4) includes selected work accomplishment measurements, and (5) identifies funding and staffing by program and location.

The band analysis process does not require the tribes, agencies, and area offices to rank the programs within the decision packages as required by ZBB. Instead, priorities are reflected by increasing or decreasing funds among banded programs at constrained levels. The tribes may also choose to discontinue a banded program or service determined to be nonessential.

In addition, BIA's budget system does not (1) address alternative methods or their funding levels and (2) require the agencies and tribes to identify the impact of a funding level less than the prior year's base. Also, the narrative statements often lack justification for continuing existing programs and focus primarily on proposed activities and incremental budget changes. This is contrary to the ZBB requirement that agencies justify the total cost of both existing and proposed activities as well as incremental budget changes.

Location budgeting, as proposed by BIA, will require the tribes to (1) rank the programs after funding priorities have been identified and (2) identify the impact of a funding level less than the prior year's base. Location budgeting, as proposed, does not require the tribes to (1) address alternatives and their funding levels and (2) prepare narrative statements justifying the total cost of both existing and proposed activities.

According to BIA officials, location budgeting will give the Congress and other reviewing offices an opportunity for the first time to consider tribal needs and priorities individually rather than on a BIA-wide basis. However, location budgets should be consolidated by program for informational use in the Federal budgetary process. The programs should also be justified and supported by BIA in its fiscal year budget estimates and justifications.



## CONCLUSIONS

Tribal officials view some Federal budgetary constraints as shortcomings in BIA's budget system. Although BIA's budget must be developed within these constraints, changes to the Bureau's budget system could help to minimize the adverse impact of these constraints on tribal funding priorities.

## RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior have the Assistant Secretary for Indian Affairs:

- Reflect tribal funding priorities in BIA's fiscal year budget justifications and estimates.
- Give the tribes an opportunity to update their program-funding priorities, thereby making BIA's budget system more responsive to changing conditions at the agencies and tribes.
- Include all principal objectives of ZBB in BIA's budget system and consolidate location budgets by program for informational use in the Federal budgetary process.

BUREAU OF INDIAN AFFAIRS  
 BAND ANALYSIS (LOCAL FUNDING PRIORITIES) FISCAL YEAR 1979  
 (Dollars in thousands and tenths)

Location Name	Program	Line Code	1978 BASE		Total Base	1979 Constrained			1979 Unconstrained	1979 Need
			1978 Band Plus New Programs	Paycost & Transfers		LOWER	TARGET	HIGHER		
	Education and Training-General	01-1000				✓	✓	✓	2/	3/
	School Operations-Off res. boarding	02-1100								
	School Operations-All other	03-1100								
	Direct Instruction	04-1361								
	Informal Learning	05-1362								
	Higher Education Institutional Assistance	06-1398								
	All Other Continuing Education	07-1399								
	Special Education Experiences	08-1400								
	Previously Private Schools	09-1700								
	Community Services-General	10-2000								
	Tribal Courts	11-2165								
	Agricultural Extension Service	12-2168								
	All other Aid to Tribal Gov't. (Excludes 2121 Comprehensive Planning)	13-2199								
	Social Services (Excludes 2261-2265, grants)	14-2200								
	Law Enforcement	15-2300								
	Housing	16-2400								

Location Name	Location Code									
	Line Code	1978 Fund r. is New Programs	1978 BASE Paycost & Transfers	Total Base	1979 Unconstrained	1979 Uncon- strained	1979 Need			
					LOWER 1/	TARGET 2/	HIGHER 1/			
Self-Determination Grants 1/ (Excludes incentive accounts)	17-2661									3/
Commercial Development-General	18-3100									
Commercial Enterprise Development (Excludes 3132 IMP)	19-3100									
Credit and Financing (Excludes 3262, 3263, 3264, 3269)	20-3200									
Residential Center Training	21-3364									
Vocational Training-Institutions	22-3365									
Other Employment Assistance (Excludes 3362, OJT and 3363, IAP)	23-3399									
Road Maintenance (includes Airstrips)	24-3500									
Trust Services-General	25-4000									
Environmental Quality Services	26-4122									
All Other Rights Protection	27-4199									
Real Estate Services (Excludes 4211 Boundary Surveys)	28-4200									
Financial Trust Services	29-4300									
Natural Resources-General	30-5000									
Agriculture	31-5100									
Forestry (Excludes Congressional add-on)	32-5200									
Minerals & Mining	33-5300									
Water Resources	34-5400									

Location Name	Line Code	1978 BASE			1979 Constrained			1979 Unconstrained	1979 Need
		1978 Band Plus New Programs	Paycost & Transfers	Total Base	LOWER	TARGET	HIGHER		
Wildlife and Parks	35-5700				1/	2/	2/	3/	
Facilities-General	36-6000								
Facilities Ops.-Off. res. boarding	37-6400								
Facilities Ops.-All other	38-6400								
Facilities R & M-Off res boarding	39-6400								
Facilities R & M-All other	40-6500								
Executive Direction	41-7100								
Program Development and Budget	42-7261								
Safety Management Services	43-7271								
All Other Administrative Services	44-7299								
TOTAL, ABOVE	45-0000								

1/ Line 45 for Lower, Target, and Higher Constrained levels are: For Agencies - 10%, 11%, 12% of 1978 Total Base. For Area Offices - 9%, 10%, 11%. For the Manjo Area - 10%, 11%, 12%.

2/ "Unconstrained" means modest increases over the target level for those few activities or programs which could achieve relatively high and rapid payoffs at the margin. It could total less than the "Higher" level.

3/ "Need" means a feasible amount that could be effectively spent during 1979.

Signature of Agency Superintendent or Area Director \_\_\_\_\_ Date \_\_\_\_\_

Signature of Tribal Chairman or Appropriate Tribal Official(s) (add sheets if necessary) \_\_\_\_\_ Date \_\_\_\_\_

REASONS FOR A PROGRAM TO BE OFF THE BAND

1. Projects that are of a demonstrative nature that will not be expanded to multiple reservations until the concept can be evaluated and demonstrated.  
  
(Billings computer.)
2. Projects of a high cost nature with specific short term (1-3 year) duration and cannot be expected to maintain their funding level at an agency.  
  
(Indian Action Teams, Roads, Minerals inventories, major irrigation projects.)
3. Program with a directed level of funding or the allocation procedures has been specified by the Secretary of the Interior, Congress, Courts or OMB.  
  
(Aid to public schools.)
4. Programs that are not funded within the regular appropriations (with the levels specified by other organizations).  
  
(Highway Safety, Supplementary Education.)
5. Program where no discretionary opportunity exists, i.e., it must be funded no matter what level of request is made.  
  
(Social Service grants, environmental impact statements, litigation & enrollment shifts.)
6. Program with specific legislative authority making it of short duration (1-3 years).  
  
(IBDP, revolving loans, loan guarantee.)
7. Program that involves multiple Indians outside the agency's jurisdiction or in the case of Area determinations, outside the Area's jurisdiction.  
  
(Off-reservation boarding schools.)
8. Start-up costs of a new high cost project.

9. A major shift in emphasis of the program has taken place.

(Will be out of the "Band Analysis" until one year of operating experience is gained.)

(Law & Order.)

10. An exclusively centralized operating program with no allocations to the field.

(School facilities.)

11. Programs required as a trust responsibility that cannot be predicted.

Distribution of Field Program Funds Between BIA

Area and Agency Offices

(Excluding Navajo Area)

<u>Activity/Sub-Activity</u>	<u>Total</u>		<u>Range of Area Office Percent</u>	
	<u>Area Offices</u>	<u>Agency Offices</u>	<u>High</u>	<u>Low</u>
<u>Education</u>				
Direct School Operations.....	49.6	50.4	100.0 (3,11)	7.2 (4)
Career Development.....	26.8	73.2	71.6 (3)	1.9 (4)
<u>Indian Services</u>				
Aid to Tribal Government.....	44.4	55.6	90.0 (8)	6.9 (5)
Social Services (Grants).....	100.0	0	100.0	100.0
Social Services (Others).....	15.9	84.1	58.8 (11)	0 (5)
Housing (Ren. and Rep.).....	2.7	97.3	32.2 (5)	0 (2,3,4,7,11)
Housing (Other).....	29.0	71.0	73.2 (6)	0 (5)
<u>Tribal Resources Development</u>				
Commercial Ent. Development..	67.4	32.6	100.0 (2,6,10)	42.1 (9)
Credit and Financing .....	53.6	46.4	100.0 (11)	22.1 (5)
Direct Employment (non-OJT)..	42.9	57.1	82.9 (11)	15.1 (10)
Road Maintenance.....	3.4	96.6	100.0 (6)	0 (2,3,11)
Agriculture.....	12.2	87.8	78.6 (11)	0 (5)
Forestry.....	14.7	85.3	87.8 (6)	0 (5,8,1)
Wildlife and Parks.....	75.1	24.9	100.0 (6,7)	0 (5)
Minerals and Mining.....	78.4	21.6	100.0 (4,6,9)	58.4 (1)
Irrigation and Power.....	72.6	27.4	100.00 (9,10,11)	0 (2,4)
<u>Trust Responsibilities</u>				
Environmental Quality.....	96.5	3.5	100.0 (all except 1,10)	82.7 (1)
All Other Rights Prot.....	66.7	33.3	100.0 (2,5,7,9)	0 (11)
R. Estate Appraisals.....	75.3	24.7	100.0 (1,2,5,6,7,9)	0 (11)
All Other Real Estate.....	38.5	61.5	79.1 (8)	0 (5)
Financial Trust Services.....	47.9	52.1	100.0 (2,6,7)	0 (5,9)
<u>General Management and Facility Operations</u>				
Repair and Maintenance.....	47.3	52.7	100.0 (3,8)	2.8 (5)
Other Facility, O&M.....	34.7	65.3	100.00 (8)	0 (4,7,11)
Reservation Programs.....	36.5	63.5	100.0 (6)	20.7 (10)
Safety Management.....	92.4	5.6	100.0 (3,6,7,8,9,10,11)	63.1 (2)
Other Administration.....	53.6	46.4	64.3 (8)	17.8 (7)

Key

- |                 |                 |
|-----------------|-----------------|
| (1) Aberdeen    | (6) Juneau      |
| (2) Albuquerque | (7) Minneapolis |
| (3) Anadarko    | (8) Muskogee    |
| (4) Billings    | (9) Phoenix     |
| (5) Eastern     | (10) Portland   |
|                 | (11) Sacramento |

(OMB Report on The Bureau of Indian Affairs Budget Preparation Process Dated July 1975)

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