

# Indian Affairs: Opportunities Exist to Address Bureau's Strained Regional Workforce Capacity

GAO-26-107940

Q&A Report to Congressional Committees

February 17, 2026

## Why This Matters

The United States has undertaken a unique trust responsibility to protect and support Tribes and their citizens through treaties, statutes, and historical relations (25 U.S.C. § 5601(3)). These trust obligations and responsibilities do not exist as a form of federal welfare but as repayment on a nation-to-nation agreement. The Department of the Interior's Indian Affairs provides a wide variety of services and funding to 575 federally recognized Tribes, serving approximately 2.5 million American Indians and Alaska Natives.

The Inflation Reduction Act (IRA; Pub. L. No. 117-169, 136 Stat. 1818 (2022)) provides significant supplemental funding for Tribes and programs that serve Tribes. In the IRA, Congress appropriated \$385 million through the end of fiscal year 2031 to the Bureau of Indian Affairs (BIA), located under Indian Affairs. The IRA includes a provision for us to support oversight of the distribution and use of funds appropriated in the IRA (Pub. L. No. 117-169, § 70004, 136 Stat. at 2087).

In November 2024, we found that components in Indian Affairs' Central Offices that were implementing IRA programs experienced increased workload that exacerbated existing capacity challenges, making it difficult to meet mission needs across competing priorities. This report addresses IRA implementation in Indian Affairs' regional offices, regional workforce capacity since the IRA was enacted, and opportunities for Indian Affairs to help meet overall regional workload demands to support Tribes.

## Key Takeaways

- Regional officials said IRA implementation increased overall workload and exacerbated existing regional workforce capacity challenges, affecting the agency's ability to provide services to Tribes. The pause in IRA fund disbursements in early 2025 led to schedule delays and potential cost increases for projects, impacting Tribes.
- From fiscal year 2022 through fiscal year 2024, total staff in Indian Affairs' regional offices decreased. Staff separations were highest among staff with less than 5 years of service and staff with over 20 years of service. These service categories made up over half of the regional workforce during this time frame. With fiscal year 2025 changes to agency workforce policies and staffing, additional separations are expected, which will further strain regional capacity.
- We recommend that Indian Affairs systematically identify and assess opportunities to streamline its policies, processes, systems, and requirements to better meet workload demands and implement a comprehensive plan to create efficiencies. We also recommend that Indian Affairs systematically assess tribal technical assistance needs to expand Tribes' use of self-determination contracts and self-governance compacts and formally assess resources needed to do so.

## What is the regional offices' role in implementing programs and funding for Tribes?

Indian Affairs delivers program services as well as distributes and oversees awarded funds to tribal recipients for tribally administered programs through its 12 regional offices and 83 agency offices. These offices report to the BIA Deputy Director of Field Operations and administer program services to Tribes directly or through self-determination contracts, grants, or self-governance compacts.

Each regional office is headed by a regional director. Typically, a Deputy Regional Director for Trust Services oversees program activities related to natural resources, agriculture, fish, wildlife, parks, and real estate services. A Deputy Regional Director for Indian Services oversees program activities related to transportation and tribal services. Awarding officials are responsible for working with Tribes to obligate funding once federal funds are transferred from Indian Affairs' Central Offices to the regional offices. Self-determination specialists in the regional offices provide services to Tribes, such as audit and contract support and technical assistance.<sup>1</sup>

### Self-Determination Contracts and Self-Governance Compacts

Self-determination contracts and self-governance compacts create flexibilities for Tribes to administer federally funded programs and can streamline program delivery. The Indian Self-Determination and Education Assistance Act (ISDEAA), as amended, authorizes federally recognized Tribes to assume the administration of a variety of federal programs, or portions thereof, through self-determination contracts or self-governance compacts. Self-determination contracts allow Tribes to assume responsibility for managing a program's day-to-day operations that would otherwise be managed by the federal government (25 U.S.C. § 5321(a)). Federal agencies provide technical oversight to ensure that the Tribe meets contract terms and reporting requirements. Self-governance compacts allow Tribes to negotiate broad agreements with federal agencies that can cover the administration of multiple programs. Compacts transfer administration of the program to Tribes and provide the Tribes with some flexibility in program administration. To be eligible for participation in self-governance compacting, a Tribe must demonstrate financial stability and management capability, among other things (25 U.S.C. § 5362).

Sources: The Indian Self-Determination and Education Assistance Act (ISDEAA), Pub. L. No. 93-638, 88 Stat. 2203 (1975) (codified as amended at 25 U.S.C. §§ 5301-5423). | GAO-26-107940

## How has IRA implementation at Indian Affairs changed over time?

Since the IRA was enacted in fiscal year 2022, \$293.5 million of the \$385 million in appropriations available to BIA through the end of fiscal year 2031 had been obligated or committed as of December 19, 2025.<sup>2</sup> Some of the funds were paused for disbursement in fiscal year 2025.

On January 20, 2025, Executive Order 14154, "Unleashing American Energy," directed agencies to pause the disbursement of funds appropriated through the IRA.<sup>3</sup> As a result, Indian Affairs paused the disbursement of all IRA funds that had not yet been expended. Over 65 percent of IRA funds were initially paused for disbursement, according to Indian Affairs data we reviewed. In response to a court order in April 2025, existing fund obligations that were previously transmitted to the Department of the Treasury's accounts for transfer to recipients were placed back into an open status, allowing recipients to access awarded funds, according to a senior Indian Affairs official.<sup>4</sup>

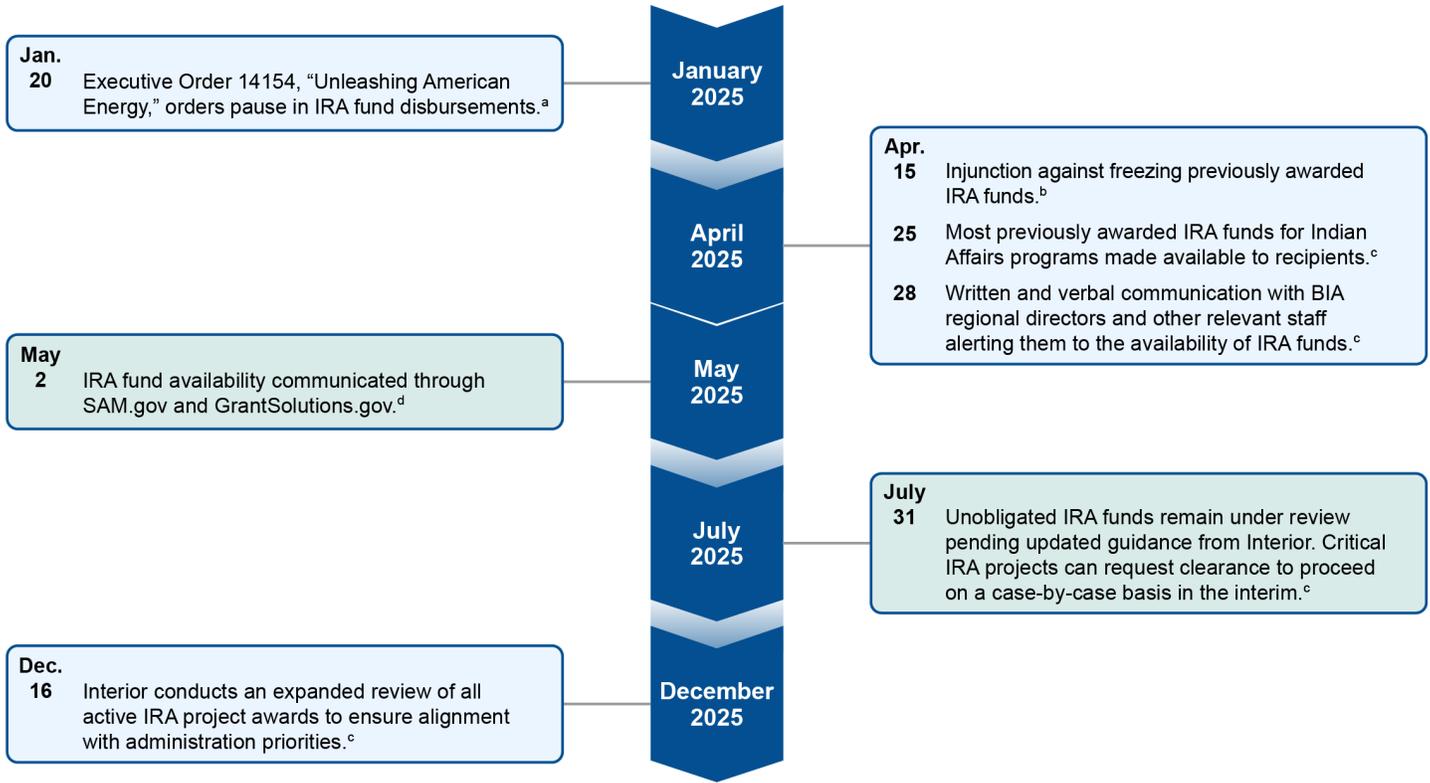
After the court order, funds not yet obligated prior to the executive order were placed under review but could be released on a case-by-case basis, according to officials. To request the release of funds under review, officials told us that Tribes or congressional members could communicate to Indian Affairs the urgency of releasing funds. However, according to BIA communications we reviewed, the extent to which Tribes were aware of this option is unclear. Indian Affairs staff would then fill out a justification memorandum to be approved by the Assistant Secretary of Indian Affairs and Interior's Policy, Management and Budget office.

However, as of December 16, 2025, Interior was conducting an expanded review of all active IRA project awards to ensure alignment with administration priorities, according to communications we reviewed. As part of this review, Interior

bureaus and offices were instructed to recommend which projects should stop or continue and submit these recommendations to the assistant secretaries, with final decisions to be made by the Deputy Secretary of the Interior.

As of December 19, 2025, about \$186.1 million of the total IRA funds appropriated to BIA, or 48 percent, had not yet been expended. Of this amount, about \$91.5 million, or 24 percent of the total IRA funds appropriated, were not yet obligated, according to data we reviewed. These included \$5.8 million of the \$9.5 million in IRA funds appropriated to cover administrative costs of IRA implementation. Figure 1 provides a timeline of events beginning in fiscal year 2025 affecting IRA implementation.

**Figure 1: Timeline of Events Beginning in Fiscal Year 2025 Affecting Inflation Reduction Act (IRA) Implementation at the Department of the Interior's Indian Affairs**



Sources: GAO review of relevant laws, executive orders, court orders, and agency information. | GAO-26-107940

<sup>a</sup>Exec. Order No. 14154 of January 20, 2025, "Unleashing American Energy," 90 Fed. Reg. 8353 (Jan. 29, 2025).

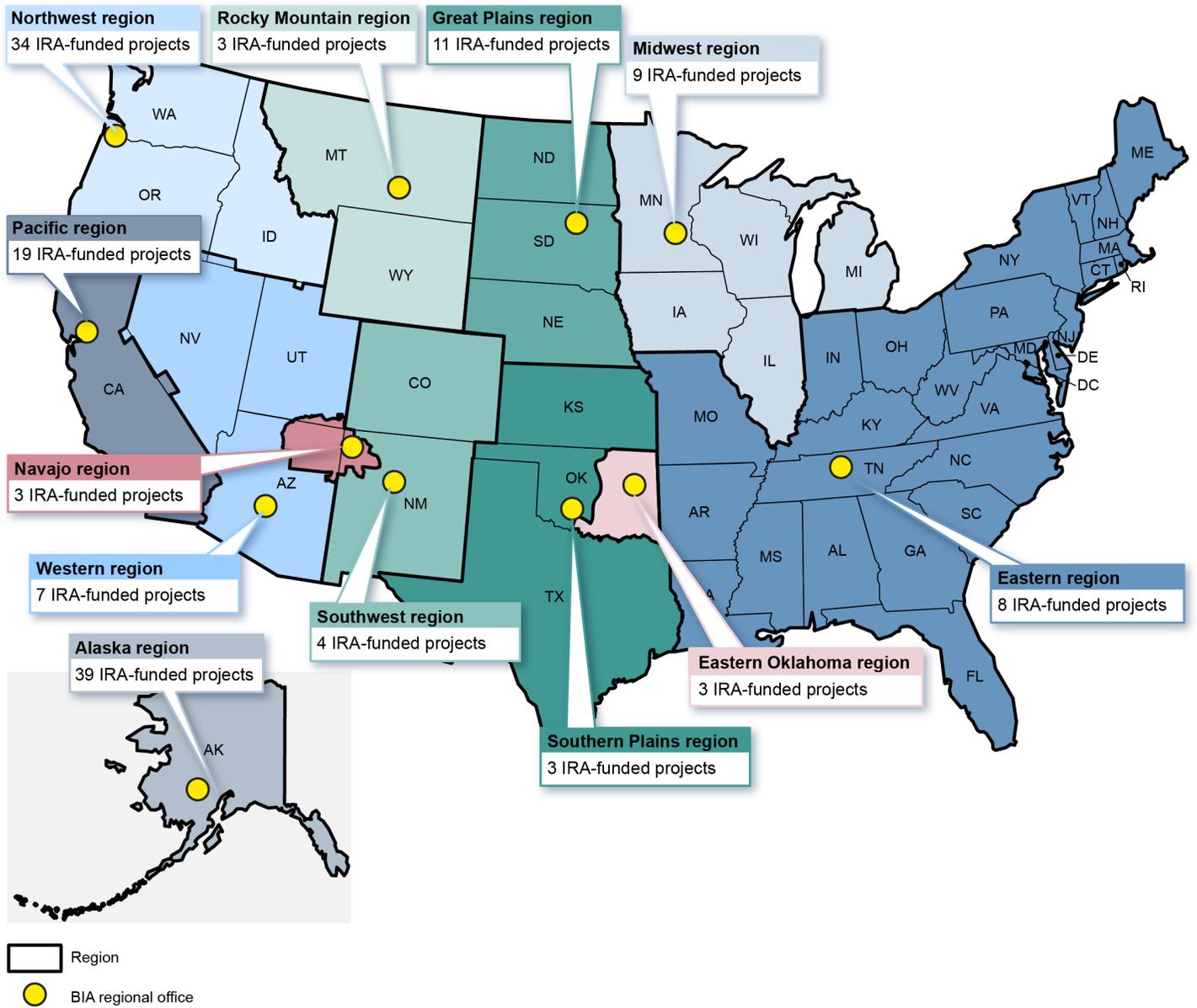
<sup>b</sup>The U.S. District Court for the District of Rhode Island, in *Woonasquatucket River Watershed Council v. U.S. Department of Agriculture*, granted a preliminary injunction enjoining five federal agencies, including Interior, from freezing on a non-individualized basis the processing and payment of funding appropriated under the IRA that had already been awarded. 778 F. Supp. 3d 440 (D.R.I. Apr. 15, 2025) (appealed No. 25-1428 (1st Cir. May 1, 2025)).

<sup>c</sup>According to information and responses we reviewed from senior Indian Affairs officials.

<sup>d</sup>SAM.gov is the federal government system Indian Affairs uses for awards management, and GrantSolutions.gov is the federal government's grants management services provider.

As of December 19, 2025, Indian Affairs had awarded 143 IRA-funded projects totaling about \$360 million to support tribal electrification, community resilience, and fish hatcheries across its 12 regions, as shown in figure 3. The Alaska region received the largest IRA project award amount (almost \$120 million) and had the most individual projects (39).

**Figure 2: Bureau of Indian Affairs (BIA) Regions and Number of Projects Funded by the Inflation Reduction Act (IRA), as of Dec. 19, 2025**



Sources: GAO review of Indian Affairs information; Map Resources (map). | GAO-26-107940

Table 1 shows the status of funds for the 143 IRA project awards by Indian Affairs region as of December 19, 2025. Amounts listed are for specific projects and do not include funds for administrative costs or funds not allocated to a specific region.

**Table 1: Status of Inflation Reduction Act (IRA) Project Awards by Bureau of Indian Affairs (BIA) Region as of Dec. 19, 2025**

In millions of dollars

BIA region	Total amount in IRA project awards (number of projects)	Total amount initially paused as of Mar. 3, 2025 (percent of total awarded)	Total amount obligated but not yet expended as of Dec. 19, 2025 (percent of total awarded)	Total amount not yet obligated as of Dec. 19, 2025 (percent of total awarded)
Alaska	119.9 (39 projects)	98.0 (82%)	39.1 (33%)	39.6 (33%)
Eastern	20.0 (8 projects)	13.2 (66%)	5.1 (25%)	0.0 (0%)
Eastern Oklahoma	10.9 (3 projects)	6.7 (62%)	2.8 (26%)	0.0 (0%)
Great Plains	25.5 (11 projects)	8.6 (34%)	5.5 (22%)	0.5 (2%)
Midwest	30.2 (9 projects)	25.9 (86%)	10.7 (35%)	5.8 (19%)
Navajo	17.8 (3 projects)	17.4 (98%)	8.7 (49%)	0.0 (0%)
Northwest	43.3 (34 projects)	11.6 (27%)	4.5 (10%)	5.9 (14%)
Pacific	31.2 (19 projects)	21.8 (70%)	4.0 (13%)	12.6 (40%)
Rocky Mountain	12.4 (3 projects)	2.2 (18%)	0 (0%)	0.0 (0%)
Southern Plains	11.2 (3 projects)	1.5 (13%)	0 (0%)	1.5 (13%)
Southwest	19.5 (4 projects)	14.7 (76%)	11.9 (61%)	0.0 (0%)
Western	17.6 (7 projects)	7.3 (42%)	1.6 (9%)	5.0 (28%)
<b>Total</b>	<b>359.5 (143 projects)</b>	<b>229.0 (64%)</b>	<b>93.8 (26%)</b>	<b>70.9 (20%)</b>

Source: GAO analysis of data provided by the Department of the Interior's Indian Affairs. | GAO-26-107940

Note: Amounts are for specific projects and do not include funds for administrative costs or funds not allocated to a specific region. Numbers may not sum to totals because of rounding. Amounts paused as of March 3, 2025, refer to amounts paused after Executive Order 14154 of January 20, 2025, "Unleashing American Energy," 90 Fed. Reg. 8353 (Jan. 29, 2025). According to BIA officials, previously obligated funds were later released in response to an April 2025 court order. Amounts not yet obligated prior to the executive order were placed under review but could be released on a case-by-case basis, according to officials. As of December 16, 2025, Interior was conducting an expanded review of all active IRA project awards to ensure alignment with administration priorities, according to communications we reviewed.

## How have Tribes been affected by Indian Affairs' implementation of IRA?

Selected tribal organization representatives and agency officials said that IRA funding was valuable for Tribes, but that Tribes received conflicting guidance and faced schedule delays and potential cost increases because of the January 2025 funding pause for IRA projects.

Officials we interviewed from five regions and some tribal organization representatives we spoke with said IRA funding was valuable for Tribes. For example, one tribal organization representative told us that a Tribe used IRA funding to build infrastructure away from low-lying areas to reduce flood risk. Representatives we spoke with from another tribal organization told us an IRA-funded program supporting tribal electrification made it possible for Tribes to get transmission lines on a cost-effective basis.

However, Tribes faced challenges with inconsistent information and negative impacts on projects after the pause in disbursements. For example, according to one tribal organization representative, Indian Affairs gave Tribes conflicting information about if and when Tribes could resume implementation of their IRA-funded projects, which effectively paused all IRA-funded projects. According to one agency official, Tribes were initially told to pause IRA-funded projects regardless of whether funds had been obligated or they had received funds. Additionally, one Tribe was initially told not to spend IRA funds that were already in their accounts, but BIA officials later advised that Tribes with funds already in their accounts could continue to spend money on IRA-funded projects, according

to one regional tribal organization representative. However, Tribes could not receive further technical assistance or guidance from BIA because of the funding pause, according to two tribal organization representatives.

Additionally, many Tribes faced negative impacts on project schedules and costs, among other effects, because of the pause in disbursement of IRA funds, according to regional officials and tribal organization representatives we interviewed. Officials from six regions and a tribal organization representative told us that some Tribes had to push out project timelines from a few weeks to a year or more because of contractor availability and local weather restrictions. Officials from three of these regions also said that these delays likely would increase project costs for materials and labor. Officials in one region told us that each month a project is delayed potentially endangers a Tribe's ability to successfully implement the project because of rising supply costs. One senior official told us that delays can hinder essential infrastructure projects that are vital for public safety and economic development, opening communities up to risks from flooding, wildfires, or lack of critical services. In three cases, according to officials, Indian Affairs granted individual waivers for IRA projects to proceed during the initial pause. Officials from one region told us it was difficult for Tribes to get funds released without additional influence, such as through engaging congressional representatives for support.

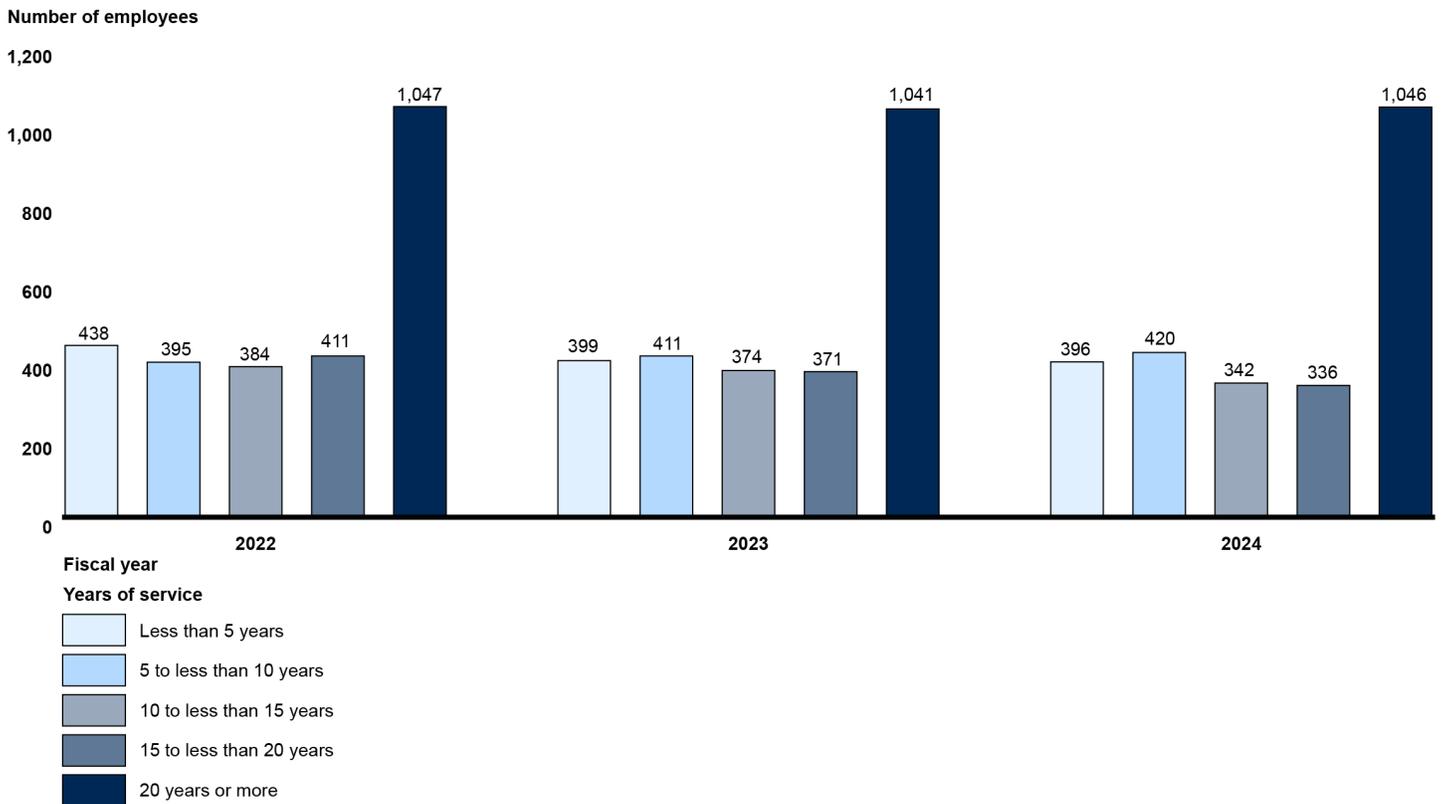
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### How has the regional workforce changed since IRA enactment?

Total staff in Indian Affairs' regional offices decreased from fiscal year 2022 (when the IRA was enacted) through fiscal year 2024, according to data we analyzed. During this time frame, on average, Indian Affairs' regional offices had a 10 percent annual staff attrition rate.<sup>5</sup> Indian Affairs' regional offices expected attrition rates to increase by the end of calendar year 2025 because of government-wide efforts to downsize and restructure the federal government, according to data we analyzed.

**Fiscal years 2022 through 2024.** According to our analysis of Indian Affairs' personnel data, from fiscal year 2022 through fiscal year 2024, total staff in the regional offices decreased from 2,675 to 2,540. During this time frame, staff with over 20 years of service made up 40 percent of regional office staff (see fig. 3).

**Figure 3: Number of Employees in the Department of the Interior’s Indian Affairs Regional Offices by Years of Service, Fiscal Years 2022–2024**



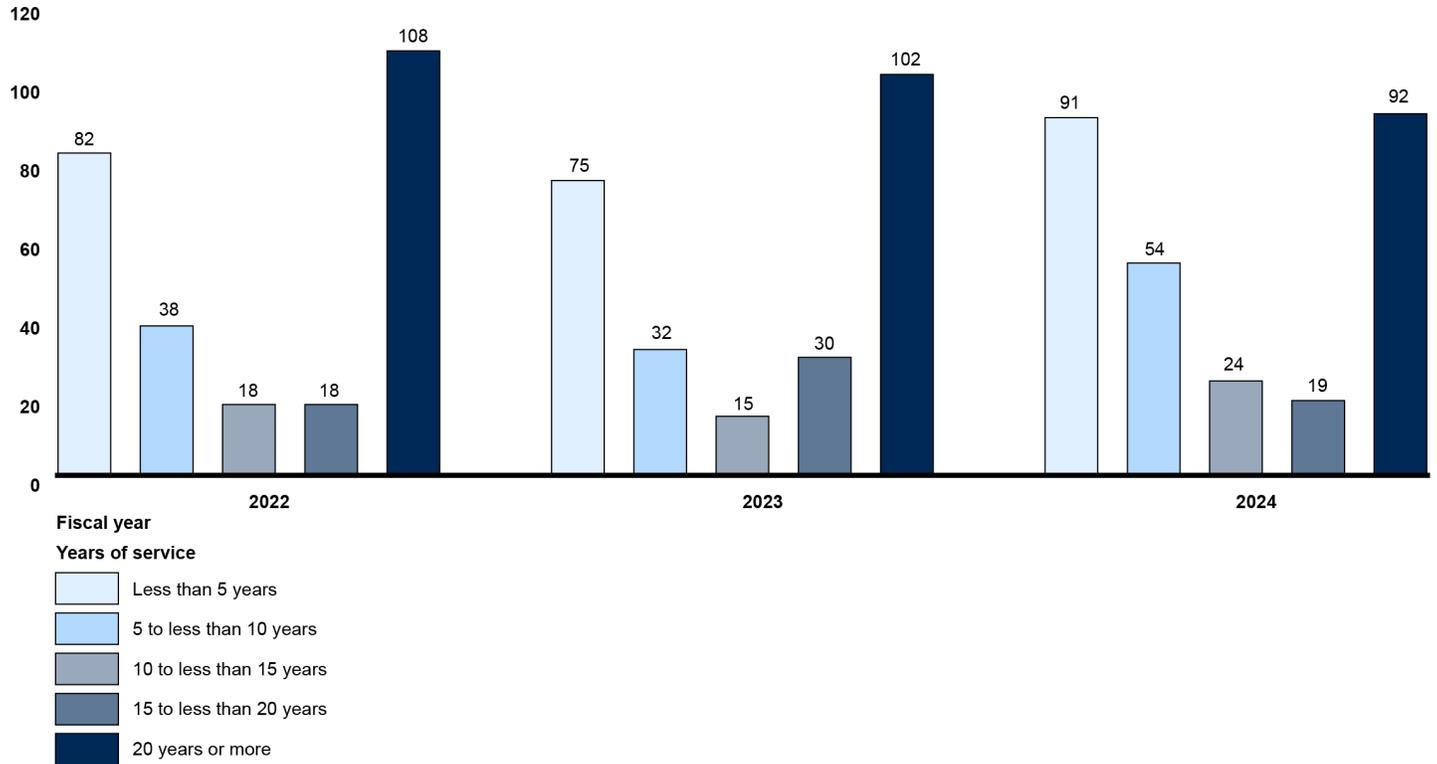
Source: GAO analysis of Federal Personnel and Payroll System data. | GAO-26-107940

Note: Number of employees in each bar are as of the first pay period of each fiscal year. We report fiscal year 2025 data separately in our report because some staffing changes during that year would not be reflected in personnel data until the end of calendar year 2025, according to officials.

Regional staff separations were highest among staff with less than 5 years of service and staff with over 20 years of service, as shown in figure 4. This mirrors our prior findings for components in Indian Affairs’ Central Offices that were involved in implementing IRA programs.<sup>6</sup> These service categories made up over half of the regional workforce during this time frame.

**Figure 4: Employee Separations in the Department of the Interior’s Indian Affairs Regional Offices by Years of Service, Fiscal Years 2022–2024**

Number of separations

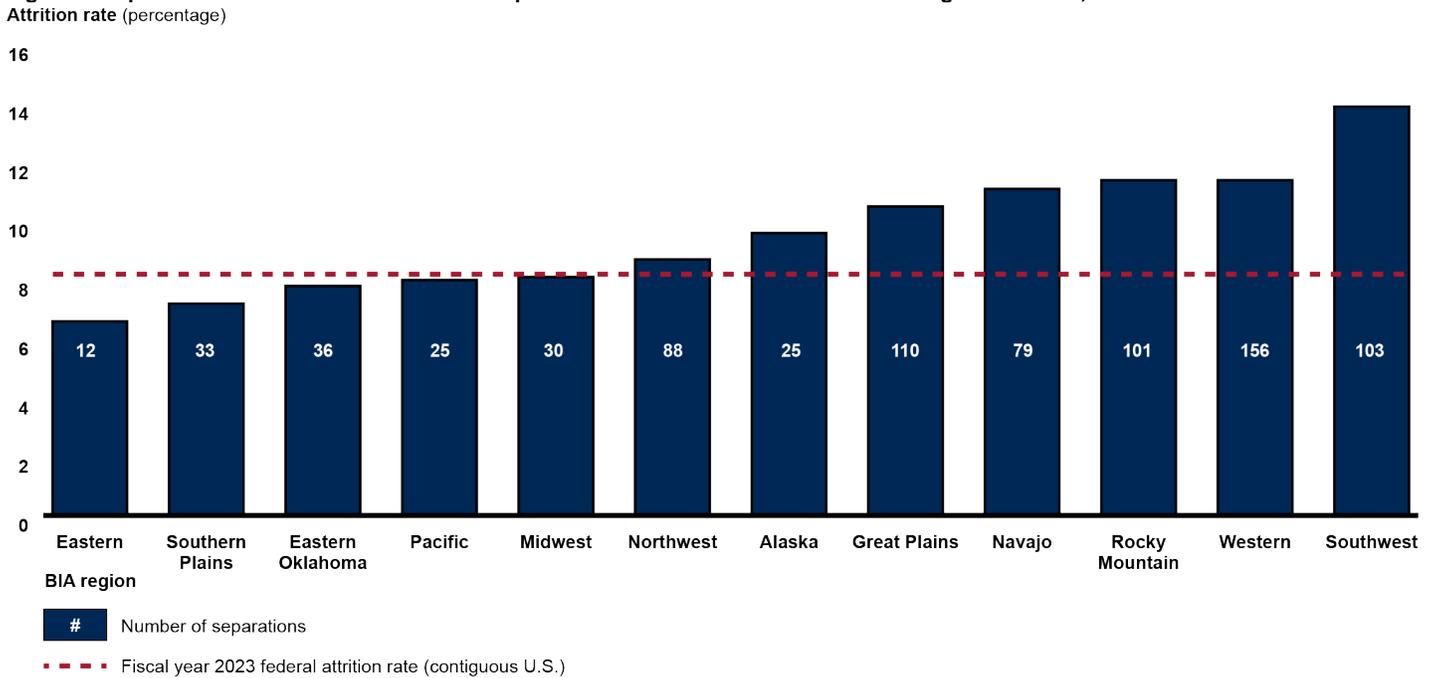


Source: GAO analysis of Federal Personnel and Payroll System data. | GAO-26-107940

Note: Data represent voluntary and involuntary separations in each fiscal year. We report fiscal year 2025 data separately in our report because some staffing changes during that year would not be reflected in personnel data until the end of calendar year 2025, according to officials.

Attrition rates varied by region during this time frame, with the Southwest region experiencing the highest attrition rate at 14 percent, as shown in figure 5. In comparison, we previously reported that the federal government attrition rate in the contiguous U.S. states was 8.2 percent in fiscal year 2023.<sup>7</sup>

**Figure 5: Separations and Attrition Rates in the Department of the Interior’s Indian Affairs Regional Offices, Fiscal Years 2022–2024**



Source: GAO-25-106527 and GAO analysis of Federal Personnel and Payroll System data. | GAO-26-107940

Note: Separations include total voluntary and involuntary separations in fiscal years 2022 to 2024. Regional attrition rates were calculated using separations and total headcount. In comparison, Indian Affairs’ regions expect 580 separations by the end of calendar year 2025, with regional attrition rates ranging from 18 to 32 percent of their respective headcounts at the beginning of fiscal year 2025, according to data we reviewed. We report fiscal year 2025 data separately in our report because the full data for that year would not be reflected in personnel data until the end of calendar year 2025, according to officials. We calculated the federal government-wide attrition rate from our prior work using the Office of Personnel Management’s Enterprise Human Resources Integration data. We previously reported that the fiscal year 2023 federal attrition rate for noncontiguous U.S. states was higher, at 8.8 percent.

**Fiscal year 2025.** Beginning in fiscal year 2025, several changes to Indian Affairs’ workforce policies and staffing took place as part of government-wide efforts to downsize and restructure the federal government. A January presidential memorandum directed executive branch agencies to freeze the hiring of federal civilian employees.<sup>8</sup> In February 2025, Executive Order 14210, “Implementing the President’s ‘Department of Government Efficiency’ Workforce Optimization Initiative,” directed agency heads to prepare for large-scale reductions in force (RIFs), consistent with applicable law, and develop agency reorganization plans to maximize efficiency and productivity.<sup>9</sup>

As a result, OPM released information allowing federal employees to voluntarily resign via a Deferred Resignation Program (DRP) with an effective resignation date no later than September 30, 2025.<sup>10</sup> Interior also allowed employees to retire early under Voluntary Early Retirement Authority (VERA) in conjunction with the DRP, which incentivized eligible employees to retire no later than December 31, 2025, according to agency information we reviewed.<sup>11</sup> Additionally, Interior authorized a department-specific DRP for eligible Indian Affairs employees, which could be taken in conjunction with VERA.<sup>12</sup> Other changes also took place, such as terminations and later reinstatements of probationary employees and changes to Interior workforce flexibilities (see app. I for a timeline and more details). Several of these workforce actions have been challenged in court, and litigation was ongoing at the time this report was published.

From May through June 2025, Interior hosted eight consultation sessions across Indian Affairs headquarters and select regions with tribal leaders and tribal organizations. Consultations aimed to discuss and receive feedback on, among other things, the agency’s proposed general workforce efficiency strategies, such as continuity and improvement of federal services and realigning internal

resources and mission objectives to better meet emerging tribal priorities. The consultations also sought feedback on emergency permitting procedures. Executive directives and Interior policies require agencies to consult with federally recognized Tribes on federal policies that have tribal implications.<sup>13</sup>

The workforce changes and related events in fiscal year 2025 have led to significant fluctuations in regional office staff and are expected to increase attrition, according to our analysis of Indian Affairs' data and information. For example:

- **Terminating and rehiring some probationary employees.** Including the termination of probationary employees, there were 211 staff separations in Indian Affairs regions in fiscal year 2025 as of February 14, as shown in table 2. Staff separations during the first 4 1/2 months of fiscal year 2025 represented 75 percent of the 280 total separations that took place in fiscal year 2024. Indian Affairs later rehired 89 probationary employees prior to August 19, 2025, according to officials and data we analyzed. Even though these employees were rehired, Indian Affairs experienced regional staff fluctuations and still had 211 staff separations as of August 19.
- **Deferred Resignation Program and Early Retirement.** Many regional staff also elected to participate in the DRP and VERA in fiscal year 2025, according to data we analyzed and interviews with agency officials.<sup>14</sup> The share of these expected separations varied across regional offices from 10 percent to 23 percent of each region's total headcount at the beginning of the fiscal year, with three offices expected to lose over 20 percent of their staff to DRP and VERA alone.

In total, Indian Affairs' regions expected 580 separations by the end of calendar year 2025, with regional attrition rates ranging from 18 to 32 percent of their respective headcounts at the beginning of fiscal year 2025; in comparison, there were 280 separations in the regions in fiscal year 2024.

**Table 2: Fluctuations in Regional Office Workforce at the Department of the Interior’s Indian Affairs Since Start of Fiscal Year (FY) 2025**

Indian Affairs region	Headcount at start of FY 2025	Total separations (as of Feb. 14, 2025)	Separations after reinstatement of probationary employees (as of Aug. 19, 2025)	Expected separations through DRP, with and without VERA, by Dec. 31, 2025	Total expected separations by Dec. 31, 2025 (% of starting headcount)
Alaska	97	5	8	17	25 (26%)
Eastern	69	6	5	9	14 (20%)
Eastern Oklahoma	152	15	11	20	31 (20%)
Great Plains	319	12	9	50	59 (18%)
Midwest	127	9	9	21	30 (24%)
Navajo	224	23	26	45	71 (32%)
Northwest	341	21	26	44	70 (21%)
Pacific	102	8	12	21	33 (32%)
Rocky Mountain	277	39	30	33	63 (23%)
Southern Plains	145	10	8	34	42 (29%)
Southwest	227	18	21	30	51 (22%)
Western	452	45	46	45	91 (20%)
<b>Total</b>	<b>2532</b>	<b>211</b>	<b>211</b>	<b>369</b>	<b>580 (23%)</b>

Source: GAO analysis of data and information provided by the Department of the Interior’s Indian Affairs. | GAO-26-107940

Note: Headcount is as of the first pay period of the fiscal year. Separations are total separations that occurred during the fiscal year. We calculated separations as of February 14, 2025, by comparing separations transactions data to cancelled transactions, which represent the reinstated probationary employees. We calculated separations as of August 19, 2025, using separations transaction data. Indian Affairs provided the number of separations expected through the Deferred Resignation Program (DRP) and Voluntary Early Retirement Authority (VERA). We calculated separation percentages using total expected separations out of total headcount at the beginning of fiscal year 2025.

Retirements beyond those who participated in the DRP and VERA may further increase staff separations. As of August 19, 2025, almost 600 regional office staff were eligible for retirement out of a total headcount of just over 2,530 staff at the beginning of fiscal year 2025, according to our analysis.

### How has IRA implementation affected existing regional workforce capacity?

IRA implementation has increased overall workload and exacerbated existing regional workforce capacity challenges, according to our survey of Indian Affairs’ regional office directors and interviews with regional officials. All 12 regional directors we surveyed said IRA implementation increased their region’s workload. Specifically, regional directors indicated there were increases to several aspects of workload, as figure 6 shows.

**Figure 6: Aspects of Indian Affairs’ Regional Office Workload That Increased Because of Implementation of the Inflation Reduction Act (IRA)**



Sources: GAO survey of regional directors at the Department of the Interior’s Indian Affairs. | GAO-26-107940

Note: Aspects depicted are based on responses from 12 regional directors surveyed from December 2024 to January 2025. All 12 regional directors surveyed indicated that these aspects of workload increased since Indian Affairs began implementing IRA programs.

Nine of 12 regional directors surveyed said that IRA implementation had affected their region’s ability to meet overall workload demands. Officials we interviewed

from two regions told us that staff had to be assigned work outside their area of expertise to implement IRA programs, which pulled them away from their usual work duties. For example, in one region, civil engineers working on tribal transportation were asked to work on projects for an unrelated IRA-funded program. Officials we interviewed from one region stated that federal funds like the IRA are similar to an “unfunded mandate” because regional offices need to implement the funding without an increase in staff. Officials we interviewed from four regions said they face competing priorities when implementing new funding streams like IRA.

Additionally, officials we interviewed from regional offices said that the pause in IRA funding affected regional workforce capacity. For example, officials we interviewed from three regions told us regional staff answered many calls from Tribes with concerns about the funding pause, but there was nothing staff could do to help. According to officials from one region, the funding pause created uncertainty for both Tribes and regional staff and deeply upset Tribes in their region. However, officials we interviewed from another region said the pause in IRA funding allowed staff to focus on other priorities, such as inputting data for Tribal Priority Allocations.<sup>15</sup>

Moreover, Indian Affairs’ regional offices faced longstanding workforce capacity and workforce planning challenges before absorbing additional responsibilities from the IRA, according to officials we surveyed and interviewed. Specifically, at least seven of 12 regional directors we surveyed identified the following as significant challenges:

- **Extended vacancies.** For example, officials we interviewed from one region told us they face extended vacancies, which could impact overall capacity and service delivery to Tribes. Officials told us it can take over a year of advertising a position to receive qualified applications.
- **Limited talent pool.** Officials we interviewed from some regions told us they face a limited talent pool for hiring. For example, officials we interviewed from five regions told us it is challenging to attract talent to work in certain areas, including remote, rural areas.<sup>16</sup> Officials from two regions also told us they compete with alternative employers for new hires, while officials from two regions said federal government salaries are not competitive with private industry.
- **Lengthy position classification process delays hiring.** We previously reported that Indian Affairs has taken steps to standardize position classification and reduce job posting delays—issues officials told us were delaying hiring. However, officials surveyed continue to identify the position classification process as a significant challenge, and officials we interviewed from three regions said job posting delays remain an issue. Officials we interviewed from one region told us that Indian Affairs’ human resources capacity is constrained and represents a bottleneck.
- **Extensive qualifications required for awarding officials.** Officials we interviewed from three regions told us there is limited capacity with awarding officials because of the extensive requirements to become certified. As we previously reported, requirements to become an awarding official include many years of extensive training and experience.<sup>17</sup>

## How has regional workforce capacity affected the ability to meet workload demands?

Regional workforce capacity challenges, including aspects exacerbated by IRA implementation, affected Indian Affairs' ability to meet its workload demands, according to agency officials and tribal organization representatives we spoke to. For example:

- **Increased workload from staff separations.** Regional officials we interviewed reported workload increases for existing staff. For example, officials from two regions told us staff who were previously doing the work of two employees would need to take on the work of three or more employees, further straining workforce capacity. Officials in one region told us they were losing the capacity to administer funds and could not hire employees to fill other gaps. Officials from two regions told us there was also a significant administrative burden associated with the firing and rehiring of probationary employees, such as from having to reinstate Personal Identity Verification cards. Officials also reported that recent staff separations had led to low employee morale. Officials from one region told us that work quality and productivity had been impaired by the low morale.
- **Limited capacity of awarding officials.** According to a senior Indian Affairs official, limited capacity of awarding officials to approve construction projects, such as those funded by the IRA, creates inefficiency. For example, six of the 12 regions did not have an awarding official that could approve construction projects; these regions must rely on one of 10 certified awarding officials from the remaining regions or the Office of Field Operations. Awarding officials are responsible for, among other things, reviewing and signing awards and modifications, approving Tribes to access awarded funds, and attending preconstruction meetings that may require in-person participation. Therefore, according to this official, awarding official unavailability may delay critical work and impact project timelines.<sup>18</sup> Officials also told us that the agency planned to assign additional oversight responsibilities to awarding officials, further increasing their workload and likely causing delays to service delivery.<sup>19</sup> One official stated that Indian Affairs needs 75 awarding officials to properly meet existing workload demands; it had 47, as of September 8, 2025.
- **Limited availability of specialized workforce.** Officials we interviewed in five regions said they lost critical expertise because of workforce changes in 2025, including self-determination specialists, budget officials, civil engineers, and environmental scientists. Officials we interviewed in one region said they had to rely on volunteers and local firefighters to address a wildfire because of a lack of staff in BIA wildland fire positions.<sup>20</sup> Officials said the region was facing a significant drought, and although there was an exception to the federal hiring freeze for wildland fire positions, they missed a key time to hire for these positions because of uncertainty about hiring earlier in the year.

Regional officials, representatives from tribal organizations, and tribal leaders also highlighted direct effects on Tribes from regional capacity challenges. For example:

- **Delays in service delivery.** Tribal leaders and representatives from selected tribal organizations consistently described longstanding delays in service delivery, such as with realty and probate, and communication challenges that likely will be exacerbated with recent workforce changes. For example, one Tribe faced challenges getting consistent and timely responses from the single awarding official left in its region because that official was supporting another region due to limited capacity.

- Progress hindered by leadership turnover.** According to an Interior report summarizing comments from Interior’s 2025 tribal consultations, tribal leaders emphasized that turnover hinders service continuity and erodes tribal confidence in the department’s ability to meet its obligations. A tribal organization representative told us that both Tribes and regional staff lacked information on planned workforce changes, and the loss of longstanding relationships because of constant turnover hinders progress on projects. One regional official said that Tribes were less likely to reach out to the regional offices for guidance because they were unsure who to contact because of the high turnover in leadership, in particular. For example, six of the 12 regional directors were acting regional directors as of June 2, 2025. One Indian Affairs official also told us that some of the other six regional directors had 3 or fewer years of experience. Additionally, five of the 24 deputy regional directors were serving in an acting capacity, while another seven deputy regional director positions were vacant.

**What actions has Indian Affairs taken to adjust its regional workforce capacity?**

Indian Affairs has taken actions to help meet IRA and overall workload demands, including the use of overtime, detailees, and contractors to support regional workforce capacity, according to a survey of regional directors and interviews with officials. Officials identified challenges with these approaches and said some of these actions were not sustainable over the long term in the regions.

**Actions before fiscal year 2025 workforce changes**

Regional directors we surveyed in early fiscal year 2025 before Indian Affairs’ workforce changes reported using numerous strategies to address workforce capacity challenges, such as those in figure 7.

**Figure 7: Reported Strategies Used Before Fiscal Year 2025 Workforce Changes to Address Regional Workforce Capacity Challenges at the Department of the Interior’s Indian Affairs**



Sources: GAO survey of regional directors at the Department of the Interior’s Indian Affairs. | GAO-26-107940

Note: Strategies depicted are based on responses from 12 regional directors we surveyed from December 2024 to January 2025. One regional director surveyed did not provide a response to this survey question.

<sup>9</sup>As we previously reported, Indian Affairs is authorized to extend preference in its recruitment and hiring processes to encourage qualified American Indian and Alaska Native candidates to seek employment with the agency. See 25 U.S.C. § 5116; 25 C.F.R. §§ 5.1, 5.2 and GAO, *Indian Affairs: Additional Actions Needed to Address Long-standing Challenges with Workforce Capacity*, [GAO-25-106825](#) (Washington, D.C.: Nov. 13, 2024). American Indian and Alaska Native is a racial category that refers to individuals who meet the legal definition of “Indian” for certain Interior hiring authorities. People who identify as such may or may not be tribal citizens.

At least nine of 12 regional directors surveyed indicated that their region was using all of these strategies to address potential workforce planning challenges that could affect their region’s ability to support implementation of IRA programs.

Officials from some regions told us about strategies they used other than those described above. For example, officials we interviewed from two of the regions surveyed told us they leveraged workforce flexibilities such as telework to improve hiring. Officials from one region expressed concern that recent changes to Interior’s telework policies requiring in-person work would remove a useful recruitment tool, increase attrition, and lower productivity. While we previously found that Indian Affairs’ use of telework was limited overall, officials in this region told us that telework was a critical recruitment tool in high-cost areas.<sup>21</sup>

### Ongoing actions since the fiscal year 2025 workforce changes

Since the fiscal year 2025 workforce changes, Indian Affairs has continued to use overtime, detailees, and contractors to meet workload demands, as well as taken new actions to support regional directors and increase the number of awarding officials. Specifically:

- **Using overtime.** Officials we interviewed from three regions told us they rely on overtime to meet workload demands. As previously reported, while Indian Affairs staff generally demonstrate a deep commitment to the agency’s missions, officials told us that working longer hours because of increasing workload demands and understaffing can contribute to burnout and separations.<sup>22</sup> According to our analysis of Indian Affairs’ data, from fiscal year 2023 to August 2025, we found that staff in Indian Affairs’ regional offices worked more than 1 million hours in overtime, or equivalent to more than 480 full-time equivalent employees.<sup>23</sup>
- **Using detailees.** Officials we interviewed from two regions told us they used detailees to fill staffing gaps, including for leadership positions. While some officials said this helped create efficiencies, others noted that this can strain workforce capacity in the offices where the detailees originate from. Moreover, a senior official told us that Indian Affairs could reach the statutory limit on compensation for detailed employees.<sup>24</sup>
- **Hiring contractors.** Indian Affairs has also used contractors to meet workload demands; however, officials in one region told us that this was not a sustainable solution. Rather, officials said a more sustainable approach would be to increase regional or program staff to manage administrative duties. According to these officials, one program hired contractors as subject matter experts. However, most were entirely new to government processes and systems. As a result, regional staff ended up being their trainers and supporting them even though the contractors were supposed to be the support teams.
- **Supporting regional directors.** Indian Affairs also implemented several tools to support acting regional directors and newer permanent regional directors, according to an Indian Affairs official. For example, the official told us that regional directors have multiple check-ins per month with leadership at different levels of the agency and an informal chat channel where regional directors can ask each other questions.

- **Increasing capacity of awarding officials.** Additionally, Indian Affairs has taken steps to increase the number of awarding officials to address limited capacity. Indian Affairs issued 10 provisional certifications to increase the number of awarding officials. As of September 8, 2025, the agency had 47 awarding officials, with 10 certified to approve construction projects, according to officials. Officials told us the agency can now approve provisional status for awarding officials that approve construction, which was not possible before. According to these officials, the agency also obtained a waiver that reduced awarding official experience requirements, and the agency is doing a better job of justifying how staff experience and training can meet existing requirements.<sup>25</sup>

## How can Indian Affairs better meet regional workload demands and support Tribes?

Indian Affairs has opportunities to streamline policies, processes, systems, and requirements to help meet its overall regional workload demands, according to regional officials and tribal organization representatives we interviewed, as well as tribal leaders during 2025 consultations held by Interior. Indian Affairs could also assess tribal technical assistance needs to support expansion of tribal self-determination and self-governance.

### Streamlining opportunities

Officials and tribal organization representatives we spoke with, as well as tribal leaders who participated in summer 2025 consultations held by Interior, identified opportunities for Indian Affairs to streamline its policies, processes, systems, and requirements to create efficiencies and better position itself to meet overall workload demands. For example:

- **Policies.** One senior Indian Affairs official told us that Indian Affairs needs to regularly examine and update its internal policies to support self-determination. This official proposed that the agency review and revise the Indian Affairs Manual, Part 13, which covers self-determination functions, to ensure it remains adaptable to the changing needs of Tribes. According to this official, an update could focus on enhancing flexibility, maintaining high standards of customer service, and ensuring that contract funds under the Indian Self-Determination and Education Assistance Act (ISDEAA) of 1975, as amended, are distributed promptly and managed effectively by Tribes.<sup>26</sup> Moreover, according to a tribal organization representative, updating guidance on which Indian Affairs programs and activities should be classified as inherently federal functions could create more opportunities for Tribes to assume direct responsibility for programs.<sup>27</sup>
- **Processes.** Officials and tribal representatives said streamlining processes could lessen the administrative burden on both Indian Affairs staff and Tribes. Tribal leaders stated that processes and reporting for Tribes to access funds were cumbersome. According to an Interior report summarizing comments from Interior's 2025 tribal consultations, tribal leaders said that some reporting requirements and administrative processes can divert tribal capacity away from service delivery and governance. A senior official told us that developing consistent, mandatory processes for self-determination staff across all regions—including streamlining pre-award, contract administration, and close-out processes—could significantly enhance operational efficiency.
- **Systems.** Officials and tribal organization representatives noted that updating information technology systems could help streamline reporting, funding, payments, and information sharing. For example, representatives from one tribal organization requested that Interior discontinue use of the Department of the Treasury's payments system for transferring funds authorized under

ISDEAA to Tribes and instead implement a direct wire transfer process that would reduce bureaucratic delays. Senior Indian Affairs officials told us they were working with Treasury on a solution in the near future. Another tribal organization representative told us systems across Indian Affairs do not interface with each other, which makes it cumbersome to share information across systems. One senior official told us that implementing a comprehensive automated system to replace many manual processes was crucial to streamline operations, facilitate better data management, enhance communication, and reduce the lag in response time and service delivery.<sup>28</sup>

- **Requirements.** Officials in one region stated there might be opportunities to change the program requirements regarding tribal resolutions. For example, when applying for a tribal government grant for Indian Child and Family Service programs, Tribes are required to submit a current, signed tribal resolution requesting the grant, but it may take a Tribe 3 months to get that resolution, further delaying the project, according to officials.<sup>29</sup> Officials also identified opportunities related to training requirements. For example, one senior official told us that providing ongoing and more targeted training programs to self-determination staff could better align workload management with the agency's mission and could enhance efficiency and effectiveness in supporting Tribes.

During Interior's 2025 tribal consultations, Indian Affairs shared general proposed workforce efficiency strategies and requested formal input on critical needs as the agency develops plans to implement operational improvements. However, according to our interviews with officials, Indian Affairs has not systematically identified and assessed opportunities to streamline operations or developed concrete actions to address them to enhance workforce efficiencies and further support tribal self-determination. As discussed above, officials and tribal organization representatives we spoke with, as well as tribal leaders during Interior's 2025 consultations, highlighted various opportunities to address outdated policies and systems, as well as cumbersome processes and requirements.

OMB-OPM guidance states that agency reorganization plans should include plans to reduce costs and promote efficiencies through improved technology and elimination of duplicative systems, as well as any changes to regulations and agency policies that could speed up implementation of the reorganization plans.<sup>30</sup> According to information presented at the consultations, the agency aims to streamline and unify core business and administrative functions to enhance processes, reduce redundancies, and improve delivery of services to Tribal Nations.<sup>31</sup> Federal internal control standards also state that agency management should implement control activities through policies and procedures. This may include reviewing policies, procedures, and related control activities on a periodic and ongoing basis for continued relevance and effectiveness in achieving objectives or mitigating related risks.<sup>32</sup>

Systematically identifying and assessing opportunities to streamline existing policies, processes, systems, and requirements—and developing and implementing a comprehensive plan to create operational efficiencies—could help reduce the administrative burden for Indian Affairs staff and Tribes. Furthermore, this could enable Indian Affairs to better meet workload demands and fulfill its responsibilities to Tribes as it adjusts its regional workforce capacity.

### **Additional technical assistance**

In an April 2025 letter to tribal leaders, the Senior Advisor to the Secretary of the Interior stated that Indian Affairs was seeking input on how to improve technical assistance and direct support to Tribes to obtain and administer funding, as well

as increase pathways to self-determination and self-governance, among other things. Additionally, according to the general workforce efficiency strategies presented at Interior's 2025 tribal consultations, Indian Affairs proposed to uphold trust responsibilities to Tribes by expanding tribal self-determination and self-governance to reduce federal bureaucracy and regulation and implementing collaborative and sustainable workforce strategies to support long-term tribal development and resilience.

Officials and tribal organization representatives we spoke with, as well as tribal leaders who participated in Interior's 2025 consultations, said there is increased interest from Tribes in compacting and contracting federal functions, which could allow Tribes to absorb some agency functions and reduce regional workload demands. According to documentation we reviewed from the consultation sessions, tribal leaders discussed the need for sustained and sufficient support for technical assistance, including to help Tribes build capacity to increase their participation in contracting and compacting.

According to officials we spoke with, regional offices have successfully provided technical assistance to Tribes that were under contract for projects as well as some pre-award and contract start-up support funds. However, officials from one regional office told us they were not able to provide technical assistance to Tribes who were not yet under contract. Additionally, one of the officials said that recent staffing changes had affected the regions' abilities to provide technical assistance. Moreover, the technical assistance burden at the regional offices may increase due to an expansion of duties related to technical assistance. According to officials, the Assistant Secretary for Indian Affairs directed that all tribal requests for technical assistance related to self-governance receive consistent technical assistance directly from the regions rather than from the Office of Self-Governance.

Indian Affairs is directed to provide technical assistance to Tribes or tribal organizations by broad authority under ISDEAA.<sup>33</sup> For instance, a Tribe or tribal organization may request technical assistance to develop or modify a self-determination contract or for planning, designing, monitoring, and evaluating federal programs serving the Tribe.<sup>34</sup> In our prior work, we have also found that sustained technical assistance is necessary to enhance some tribal governments' ability to manage the administrative burdens associated with navigating the many different processes and procedures involved with seeking assistance from, and participating in, federal programs.<sup>35</sup> However, according to officials, Indian Affairs has not systematically assessed Tribes' technical assistance needs to expand their use of self-determination contracting or self-governance compacting. Moreover, the agency has not formally assessed whether additional resources would be necessary to meet this demand as part of its tribal budget consultation and formulation process.

As Indian Affairs implements changes in response to administration priorities and has fewer staff to conduct its work, systematically assessing Tribes' technical assistance needs and the resources needed to meet the demand could better position Indian Affairs to support Tribes that want to expand their use of self-determination contracts or self-governance compacts. Doing so could also help Indian Affairs reduce regional workload in a manner consistent with the administration's goals to support long-term tribal development and resilience. Indian Affairs may, for instance, consider leveraging existing mechanisms, such as obtaining input from tribal leaders through the Tribal-Interior Budget Council, to ensure tribal perspectives on technical assistance needs are reflected in the agency's budget requests and that unmet needs are documented.<sup>36</sup>

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## Conclusions

The IRA provided significant supplemental funding for Tribes and programs serving Tribes. However, IRA implementation increased overall workload and exacerbated existing regional workforce capacity challenges, many of which are longstanding. We found that limited capacity of some regional staff and increased workload on existing regional staff affected Indian Affairs' ability to meet its workload demands. While the agency has taken some actions to meet overall workload demands, some of these actions had limitations and may not be sustainable over the long term.

As Indian Affairs adjusts its regional workforce capacity, systematically identifying and assessing opportunities to streamline existing policies, processes, systems, and requirements—and developing and implementing a comprehensive plan to create operational efficiencies—could help reduce the administrative burden for Indian Affairs staff and Tribes. This would align with agency workforce efficiency strategies aiming to streamline and unify core business and administrative functions to enhance processes, reduce redundancies, and improve service delivery to Tribes.

In addition, systematically assessing Tribes' technical assistance needs to expand their use of self-determination contracting or self-governance compacting—and formally assessing the necessary resources required to meet this demand—could help Indian Affairs reduce regional workload in a manner consistent with administration priorities.

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## Recommendations for Executive Action

The Assistant Secretary for Indian Affairs should systematically identify and assess opportunities to streamline existing policies, processes, systems, and requirements; the agency should then develop and implement a comprehensive plan to create operational efficiencies. (Recommendation 1)

The Assistant Secretary for Indian Affairs should systematically assess Tribes' technical assistance needs to expand their use of self-determination contracts and self-governance compacts and formally assess the resources necessary to meet this demand as part of its tribal budget consultation and formulation process. (Recommendation 2)

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## Agency Comments

We provided a draft of this report to the Department of the Interior for review and comment. Interior did not provide a formal comment letter. Interior stated in an email that the agency generally agreed with our recommendations.

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## How GAO Did This Study

We reviewed relevant laws, executive orders, court orders, and agency documents and information. We also reviewed transcripts of comments from tribal leaders at eight consultation sessions that Interior held across Indian Affairs headquarters and selected regions in summer 2025. Specifically, we reviewed information relevant to IRA implementation, regional workforce capacity, relevant tribal interests, and agency policies. We also reviewed our prior work on Indian Affairs' workforce capacity and IRA implementation.

We developed, pre-tested, and administered a web-based survey to regional directors at Indian Affairs' regional offices regarding IRA implementation, workforce planning and capacity challenges, and opportunities for addressing challenges. We administered the survey from December 2024 to January 2025. All 12 regional directors responded to our survey. We analyzed survey responses and identified trends.

We analyzed data from the Federal Personnel Payroll System from fiscal year 2022 to August 2025 to identify workforce trends, such as staff separation rates, for Indian Affairs' regional offices. Additionally, we analyzed data collected by

Indian Affairs, as of July 2025, on the total number of regional staff participating in the 2025 DRP and VERA programs. Officials told us this number would not be reflected fully in personnel data until after the end of calendar year 2025. To assess data reliability, we conducted error checks, reviewed relevant documents, reviewed written responses, and interviewed agency officials knowledgeable about the data. Based on our assessment, we determined these data were sufficiently reliable for the purpose of summarizing information about Indian Affairs' regional workforce.

We also analyzed data on the status of IRA-funded projects from Interior's Financial Budget and Management System, including funds planned, expended, obligated, and not yet obligated. To assess the reliability of these data, we reviewed relevant documents and written responses from officials knowledgeable about the data and checked the data for obvious errors or missing information. Based on our assessment, we determined these data were sufficiently reliable for summarizing information on the status of IRA-funded projects by region.

We interviewed officials from seven of the 12 regional offices regarding IRA implementation, changes to workload and capacity, actions taken to address these changes, and opportunities for creating efficiencies as Indian Affairs adjusts its regional capacity. We selected regions with the greatest number of IRA-funded projects and whose regional directors indicated in responses to our survey that implementing IRA affected the region's ability to meet overall workload demands.

We also identified and interviewed representatives from a nongeneralizable sample of four national and four regional intertribal organizations. We selected these organizations using criteria such as having membership located in different BIA regions, familiarity with Tribes' experiences working with Indian Affairs, and availability to meet with us.

We applied criteria from relevant laws, agency guidance, and applicable federal standards for internal control to our findings.

We conducted this performance audit from November 2024 to February 2026 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## List of Addressees

The Honorable Rand Paul, M.D.  
Chairman  
The Honorable Gary C. Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Lisa Murkowski  
Chairman  
The Honorable Brian Schatz  
Vice Chairman  
Committee on Indian Affairs  
United States Senate

The Honorable Lisa Murkowski  
Chair  
The Honorable Jeff Merkley

Ranking Member  
Subcommittee on Interior, Environment, and Related Agencies  
Committee on Appropriations  
United States Senate

The Honorable Bruce Westerman  
Chairman  
The Honorable Jared Huffman  
Ranking Member  
Committee on Natural Resources  
House of Representatives

The Honorable James Comer  
Chairman  
The Honorable Robert Garcia  
Ranking Member  
Committee on Oversight and Government Reform  
House of Representatives

The Honorable Mike Simpson  
Chairman  
The Honorable Chellie Pingree  
Ranking Member  
Subcommittee on Interior, Environment, and Related Agencies  
Committee on Appropriations  
House of Representatives

We are sending copies of this report to the appropriate congressional committees, the Secretary of the Interior, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

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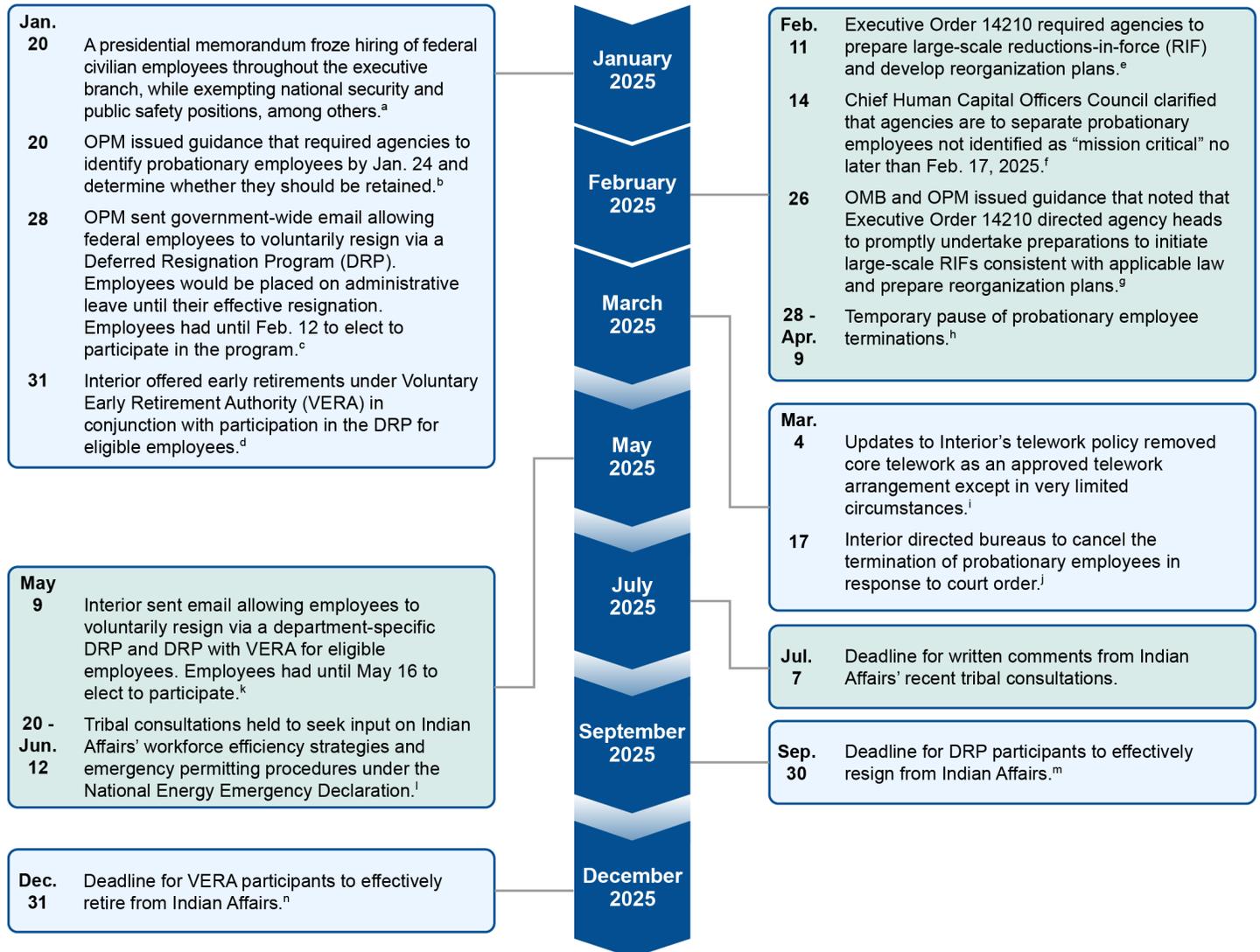
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# Appendix I: Selected Workforce Changes Applicable to Indian Affairs Beginning in Fiscal Year 2025

Figure 8: Timeline of Selected Workforce Changes Affecting the Department of the Interior’s Indian Affairs Beginning in Fiscal Year 2025



Source: GAO review of Presidential Memoranda, executive orders, Office of Personnel Management (OPM) guidance, and agency documents, and relevant court filings and opinions. | GAO-26-107940

<sup>a</sup>Presidential Memorandum of January 20, 2025, “Hiring Freeze,” 90 Fed. Reg. 8247 (Jan. 28, 2025); Presidential Memorandum, “Extension of Hiring Freeze” (Apr. 17, 2025); Presidential Memorandum, “Ensuring Accountability and Prioritizing Public Safety in Federal Hiring” (July 7, 2025). More recently, Executive Order 14356 of October 15, 2025, “Ensuring Continued Accountability in Federal Hiring,” extends the freeze indefinitely, subject to a framework for federal civilian hiring pursuant to annual agency staffing plans developed in consultation with the Office of Management and Budget (OMB) and the Office of Personnel Management (OPM). 90 Fed. Reg. 48387 (Oct. 20, 2025). For guidance on exempted categories, see Interior Memorandum, “Implementation of Civilian Workforce Hiring Freeze,” (Jan. 21, 2025). The Presidential Memorandum of January 20, 2025, also directed OMB, in consultation with OPM and the U.S. Department of Government Efficiency (DOGE) Service, to submit a plan to reduce the size of the federal government’s workforce through efficiency improvements and attrition. In Exec. Order 14158 of January 20, 2025, 90 Fed. Reg. 8441 (Jan. 29, 2025), the United States Digital Service was renamed the U.S. Department of Government Efficiency (DOGE) Service, and the U.S. DOGE Service Temporary Organization was established within the Executive Office of the President.

<sup>b</sup>Office of Personnel Management, “Guidance on Probationary Periods, Administrative Leave and Details,” Memorandum to Heads and Acting Heads of Departments and Agencies (Jan. 20, 2025).

<sup>c</sup>OPM emails entitled “Fork in the Road” (Jan. 28, 2025) and “Fork in the Road is closed” (Feb. 12, 2025). Electing employees would promptly have their duties reassigned or eliminated and be placed on administrative leave, except during necessary transition activities. Office of Personnel Management, “Guidance Regarding Deferred Resignation Program,” Memorandum to Heads and Acting Heads of Departments and Agencies (Jan. 28, 2025). Deferred resignation was available to full-time federal employees, except for military personnel of the armed forces, employees of the U.S. Postal Service, and those in positions specifically excluded by the employing agency. OPM explained that electing employees would retain all pay and benefits, regardless of workload, until their effective resignation date. The DRP was challenged, but that lawsuit was dismissed by the district court, with the

dismissal pending appeal as of December 2025. *Am. Fed'n of Gov't Employees v. Ezell*, No. 1:25-cv-10276, 2025 U.S. Dist. LEXIS 187652 (D. Mass. Sep. 24, 2025) (appealed *Am. Fed'n of Gov't Employees v. Kupor*, No. 25-1959 (1st Cir.)).

<sup>d</sup>Interior department-wide email entitled “2025 DOI Wide VERA Approval (In conjunction with DRP)” (Jan. 31, 2025).

<sup>e</sup>Executive Order 14210 of February 11, 2025, “Implementing the President’s ‘Department of Government Efficiency’ Workforce Optimization Initiative.” 90 Fed. Reg. 9669 (Feb. 14, 2025). As of December 2025, workforce reduction actions stemming from Executive Order 14210 were subject to a number of legal challenges. See, e.g., *Am. Fed'n of Gov't Emps. v. Trump*, No. 3:25-cv-3698 (N.D. Cal.) (appealed No. 25-3293 (9th Cir.)); *Nat'l Treasury Employees Union v. Trump*, No. 1:25-cv-420 (D.D.C.).

<sup>f</sup>Email from CHCO Council, re: “Follow up: CHCO Council Special Session” (Feb. 14, 2025).

<sup>g</sup>Office of Management and Budget and Office of Personnel Management, “Guidance on Agency RIF and Reorganization Plans Requested by Implementing the President’s ‘Department of Government Efficiency’ Workforce Optimization Initiative” (Feb. 26, 2025). The guidance outlines the principles agencies should achieve with its reorganization plans, including better serving the American people, significantly reducing full-time equivalent positions by eliminating positions that are not required, reducing the real property footprint, and reducing the topline budget. OMB and OPM instructed agencies to submit a Phase 1 RIF and reorganization plan no later than March 13, 2025. These plans were to include a timetable and the specific tools the agency will use in fiscal years 2025, 2026, and 2027 to achieve efficiencies including continuation of the current hiring freeze and attrition through various means including reductions in force. The OMB and OPM guidance also requested agencies to submit a Phase 2 plan for review and approval no later than April 14, 2025. The guidance directed that a number of elements be included in the plan (e.g., a proposed future organization chart, any proposed relocations of agency bureaus and offices from Washington, D.C., competitive areas for large-scale RIFs) and that the plans be targeted for implementation by September 30, 2025. Senior Indian Affairs officials said Indian Affairs had no plans to perform further workforce reductions and had not developed specific plans for workforce restructuring but might develop future plans depending on feedback from Interior’s 2025 tribal consultations, future appropriations, and future direction from the administration.

<sup>h</sup>Two federal district courts issued orders temporarily pausing the termination of probationary employees and requiring their reinstatement at Interior and numerous other agencies. *Maryland v. U. S. Dep't. of Agriculture*, 770 F. Supp. 3d 779 (D. Md. 2025); *Am. Fed'n. of Gov't. Employees, AFL-CIO v. OPM*, 770 F. Supp. 3d 1215 (N.D. Cal. 2025). These orders were stayed, respectively, by the U.S. Court of Appeals for the 4th Circuit, Nos. 25-1248, 25-1338, 2025 U.S. App. LEXIS 8407 (4th Cir. Apr. 9, 2025), and the U.S. Supreme Court, 145 S. Ct. 1914 (2025). The suit in *Maryland v. U. S. Dep't. of Agriculture* was subsequently dismissed. No. 1:25-cv-00748 (D. Md; Dkt. 146; Oct. 31, 2025). The court in *Am. Fed'n. of Gov't. Employees, AFL-CIO v. OPM* partially granted plaintiffs’ motion for summary judgment, ruling that OPM lacked authority to direct agencies to terminate their probationary employees. The court also permanently enjoined OPM from doing so, and defendant agencies from following any such OPM direction, except in accordance with OPM regulations at 5 C.F.R. § 5.3, and directed agencies to correct the stated bases for terminating probationary employees, while not ordering reinstatement of the employees. No. 3:25-cv-1780, 2025 U.S. Dist. LEXIS 179606 (N.D. Cal., Sept. 12, 2025). This order is pending appeal. No. 25-5875 (9th Cir.)

<sup>i</sup>Department of the Interior, “Telework Policy,” Personnel Bulletin 25-01 (Mar. 4, 2025).

<sup>j</sup>Interior email titled “Cancellations of Probation/Trial Terminations” (Mar. 17, 2025).

<sup>k</sup>Department of the Interior, “Indian Affairs Programs and Organizations Limited Deferred Resignation/Retirement Program (DRP) and DRP with Voluntary Early Retirement Authority (VERA) Open Period – May 9, 2025, to May 16, 2025,” Memorandum (May 9, 2025). According to the Acting Deputy Assistant Secretary for Management, the agency initiated this second DRP because of the executive direction to reduce the workforce. A DRP would allow employees to leave voluntarily and give Indian Affairs more control than a potential reduction in force. In addition, employees concerned about a potential future reduction in force were requesting the DRP from Indian Affairs so they could leave voluntarily. While Interior also offered a department-wide Deferred Resignation Program in March and April 2025, Indian Affairs programs were exempted from participating pending consultations with Tribes.

<sup>l</sup>Eight consultation sessions were held across Indian Affairs headquarters and select regions.

<sup>m</sup>Employees could resign and continue to retain pay and benefits until September 30, 2025.

<sup>n</sup>Under Interior’s DRP, employees who were eligible for early or normal retirement during calendar year 2025 could also accept the DRP but had to retire no later than December 31, 2025.

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## Endnotes

<sup>1</sup>Based on our prior work, we define “technical assistance” as providing help with navigating federal programs and processes, including identifying relevant federal programs, assisting with developing overall strategies and specific projects, grant writing and management, and understanding different program requirements. GAO, *Alaska Native Issues: Federal Agencies Could Enhance Support for Native Village Efforts to Address Environmental Threats*, [GAO-22-104241](#) (Washington, D.C.: May 18, 2022).

<sup>2</sup>An Act to provide for reconciliation pursuant to Title II of S. Con. Res. 14, Pub. L. No. 117-169, 136 Stat. 1818 (2022) (commonly known as the “Inflation Reduction Act”). In the IRA, Congress appropriated \$385 million, available through the end of fiscal year 2031, for three BIA programs: the Branch of Tribal Community Resilience, the Tribal Electrification Program, and Fish Hatchery Operations and Maintenance Programs. Pub. L. No. 117-169, §§ 80001, 80003, 136 Stat. at 2088, 2089. The \$385 million total includes \$9.5 million in appropriations for the administrative costs of carrying out the programs.

<sup>3</sup>Specifically, in relevant part, Executive Order 14154 of January 20, 2025, “Unleashing American Energy,” (i) directed agencies to immediately pause disbursement of funds appropriated under the IRA and the Infrastructure Investment and Jobs Act, (ii) directed agencies to review such disbursements for alignment with policies specified in the order, and report and provide recommendations to the Office of Management and Budget (OMB) and the National Economic Council within 90 days of the order, and (iii) prohibited agencies from disbursing such funds until the Director of OMB and Assistant to the President for Economic Policy determined that such disbursements are consistent with any review recommendations they chose to adopt. 90 Fed. Reg. 8353, 8357 (Jan. 29, 2025) at § 7(a).

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<sup>4</sup>The only exceptions were instances where an award was subject to an individualized pause, such as if a recipient was on sanctions, according to officials. The order in question preliminarily enjoined Interior and other federal agencies from freezing, halting, or pausing on a non-individualized basis the processing and payment of already-awarded funds appropriated under the IRA and another act, pending resolution of the lawsuit, and ordered Interior and other agencies to take immediate steps to resume the processing, disbursement, and payment of these already-awarded funds. *Woonasquatucket River Watershed Council v. United States Dep't of Agric.*, 778 F. Supp. 3d 440 (D.R.I. Apr. 15, 2025) (appealed No. 25-1428 (1st Cir. May 1, 2025)).

<sup>5</sup>We define attrition as the separation of employees from an agency for any reason (voluntary or involuntary).

<sup>6</sup>GAO, *Indian Affairs: Additional Actions Needed to Address Long-standing Challenges with Workforce Capacity*, [GAO-25-106825](#) (Washington, D.C.: Nov. 13, 2024).

<sup>7</sup>GAO, *Federal Workforce: Actions Needed to Improve Recruitment and Retention in Alaska, Hawaii, and U.S. Territories*, [GAO-25-106527](#) (Washington, D.C.: Oct. 15, 2024).

<sup>8</sup>Presidential Memorandum of January 20, 2025, "Hiring Freeze," 90 Fed. Reg. 8247 (Jan. 28, 2025). The memorandum also directed OMB, in consultation with the Office of Personnel Management (OPM) and the U.S. Department of Government Efficiency (DOGE) Service, to submit a plan to reduce the size of the federal government's workforce through efficiency improvements and attrition.

<sup>9</sup>Executive Order 14210 of February 11, 2025, "Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative," 90 Fed. Reg. 9669 (Feb. 14, 2025). Guidance issued by OMB and OPM on implementing this executive order outlined the principles agencies should achieve with their reorganization plans, including, for example, a focus on statutorily required functions, proposed consolidation of subcomponents, a proposed future-state organizational chart, and a reduced topline budget. Office of Management and Budget and Office of Personnel Management, "Guidance on Agency RIF and Reorganization Plans Requested by Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative" (Feb. 26, 2025). As of January 2026, workforce reduction actions stemming from Executive Order 14210 were subject to a number of legal challenges. See, e.g., *Am. Fed'n of Gov't Emps. v. Trump*, No. 3:25-cv-3698 (N.D. Cal.) (appealed No. 25-3293 (9th Cir.)); *Nat'l Treasury Employees Union v. Trump*, No. 1:25-cv-420 (D.D.C.).

<sup>10</sup>See e.g., Office of Personnel Management, "Guidance Regarding Deferred Resignation Program" Memorandum to Heads and Acting Heads of Departments and Agencies (Jan. 28, 2025). The DRP was challenged, but that lawsuit was dismissed by the district court, with the dismissal pending appeal as of January 2026. *Am. Fed'n of Gov't Employees v. Ezell*, No. 1:25-cv-10276, 2025 U.S. Dist. LEXIS 187652 (D. Mass. Sept. 24, 2025) (appealed *Am. Fed'n of Gov't Employees v. Kupor*, No. 25-1959 (1st Cir.)).

<sup>11</sup>Interior email entitled "2025 DOI Wide VERA Approval (In conjunction with DRP)" (Jan. 31, 2025). For information on VERA, see, e.g., 5 C.F.R. §§ 831.114, 842.213.

<sup>12</sup>Department of the Interior, "Indian Affairs Programs and Organizations Limited Deferred Resignation/Retirement Program (DRP) and DRP with Voluntary Early Retirement Authority (VERA) Open Period – May 9, 2025, to May 16, 2025," Memorandum (May 9, 2025). According to the Acting Deputy Assistant Secretary for Management, the agency initiated this second DRP because of the executive direction to reduce the workforce. A DRP would allow employees to leave voluntarily and give Indian Affairs more control than a potential reduction in force. In addition, according to officials, employees concerned about a potential future reduction in force were requesting the DRP from Indian Affairs so they could leave voluntarily. While Interior also offered a department-wide DRP in March and April 2025, Indian Affairs was exempted from participating pending consultations with Tribes.

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<sup>13</sup>In particular, Executive Order 13175 of November 6, 2000, calls for federal agencies to consult with federally recognized Tribes on federal policies that have tribal implications—that is, to have an accountable process to ensure meaningful and timely input by tribal officials. “Consultation and Coordination with Indian Tribal Governments,” 65 Fed. Reg. 67249 (Nov. 9, 2000); see also Department of the Interior, *Departmental Manual: Intergovernmental Relations*, pt. 512, ch. 4, 5 (Washington, D.C.: November 2022). E.O. 13175 defines “policies that have tribal implications” as “regulations, legislative comments or proposed legislation, and other policy statements or actions that have substantial direct effects on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes.” E.O. 13175 at § 1, 65 Fed. Reg. at 67249. We have previously reported on tribal consultation, including federal agencies’ policies and processes for consulting with Tribes on infrastructure. GAO, *Tribal Consultation: Additional Federal Actions Needed for Infrastructure Projects*, [GAO-19-22](#) (Washington, D.C.: Mar. 20, 2019).

<sup>14</sup>Officials said personnel actions for staff participating in the DRP and VERA would not be reflected in the personnel data until either the end of fiscal year 2025 or calendar year 2025 because participating staff were not officially separating from the agency until those dates.

<sup>15</sup>Tribal Priority Allocations are a component of the Indian Affairs budget that provides funding for various tribal programs and services, allowing Tribes to self-determine their priorities and reallocate funds accordingly.

<sup>16</sup>We also previously reported that officials from different Indian Affairs components have varying perspectives on which positions qualify for American Indian and Alaska Native hiring preference, which could further affect the talent pool available for hiring. Indian Affairs is authorized to extend preference in its recruitment and hiring processes to encourage qualified American Indian and Alaska Native candidates to seek employment with the agency. See 25 U.S.C. § 5116; 25 C.F.R. §§ 5.1, 5.2.

<sup>17</sup>[GAO-25-106825](#)

<sup>18</sup>This official also told us that having an awarding official to approve construction projects at the regional level would be better suited to manage contract awards and provide oversight, given their familiarity with local Tribes, tribal organizations, and the specific challenges they face.

<sup>19</sup>Officials told us that the agency plans to assign oversight responsibilities for the 477 program to awarding officials. Public Law No. 102-477, the Indian Employment, Training and Related Services Demonstration Act of 1992, is commonly referred to simply as “477.” 106 Stat. 2302 (codified as amended at 25 U.S.C. §§ 3401–17). The program’s primary goal is to reduce administrative time and costs for Tribes and tribal organizations so they can more effectively deliver workforce development and job training programs. This is achieved by consolidating multiple funding streams and reporting requirements, thus affording more support for job placements and case management activities.

<sup>20</sup>Indian Affairs is one of five federal agencies responsible for wildland fire management. We previously reported that Interior has faced challenges with hiring and retaining wildland firefighters. GAO, *Wildland Fire: Barriers to Recruitment and Retention of Federal Wildland Firefighters*, [GAO-23-105517](#) (Washington, D.C.: Nov. 17, 2022).

<sup>21</sup>GAO, *Federal Telework: Social Security Administration Needs a Plan to Maintain a Workforce with the Skills Needed to Provide Timely Service*, [GAO-26-107645](#) (Washington, D.C.: Jan. 23, 2026).

<sup>22</sup>[GAO-25-106825](#)

<sup>23</sup>Full-time equivalencies (FTE) reflect the total number of regular straight-time hours (i.e., not including overtime or holiday hours) worked by employees divided by the number of compensable hours applicable to each fiscal year. For a glossary of federal budgeting terms and definitions, see GAO, *A Glossary of Terms Used in the Federal Budget Process* (Supersedes AFMD-2.1.1), [GAO-05-734SP](#) (Washington, D.C.: Sept. 1, 2005). One work year, or one FTE, is equivalent to 2,080 hours of work.

<sup>24</sup>General Schedule federal employees are subject to several limitations on pay. See, e.g. 5 U.S.C. § 5307; 5 C.F.R. § 530.203.

<sup>25</sup>A representative from one tribal organization shared examples of resistance to change among some Indian Affairs staff, which creates bottlenecks. Regional officials told us that after staff departures through the Deferred Resignation Program, the agency was able to loosen the requirements for certifying awarding officials to approve construction projects.

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<sup>26</sup>Pub. L. No. 93-638, 88 Stat. 2203 (1975).

<sup>27</sup>We previously found that BIA had not consistently determined whether programs and functions are inherently federal, which can affect some Tribes' use of self-determination contracts and ultimately their ability to pursue a self-governance compact. GAO, *Indian Programs: Interior Should Address Factors Hindering Tribal Administration of Federal Programs*, [GAO-19-87](#) (Washington, D.C.: Jan. 3, 2019).

<sup>28</sup>For example, we previously found that BIA still relies on manual data sharing and storing key oil and gas information outside Interior's data systems. GAO, *Oil and Gas: Actions Needed to Improve Data Sharing at Interior*, [GAO-26-106475](#) (Washington, D.C.: Jan. 21, 2026).

<sup>29</sup>25 C.F.R. § 23.23(b)(1).

<sup>30</sup>Office of Management and Budget and Office of Personnel Management, "Guidance on Agency RIF and Reorganization Plans Requested by Implementing the President's 'Department of Government Efficiency' Workforce Optimization Initiative" (Feb. 26, 2025) at § V (specifying the elements to be contained in Phase 2 Agency RIF and Reorganization Plans).

<sup>31</sup>As of July 24, 2025, Indian Affairs officials said that they did not have plans to reorganize or further reduce the workforce. However, presentation materials shared at the tribal consultations stated that Interior would consider whether to consolidate some of Indian Affairs' functions after the consultations. Moreover, agency officials said there might be a future need to restructure or realign existing functions to satisfy administration requirements and policy decisions.

<sup>32</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-25-107721](#) (Washington, D.C.: May 15, 2025).

<sup>33</sup>Pub. L. No. 93-638, tit. I, § 104(d), 88 Stat. 2203 (codified in relevant part at 25 U.S.C. § 5322(d)), as added by Pub. L. 100-472, tit. II, § 202(d), 102 Stat. 2285, 2290 (1988).

<sup>34</sup>25 U.S.C. § 5322(d). Although the statute directs Interior to provide technical assistance only to tribal organizations, it defines tribal organizations to include the recognized governing body of any Indian Tribe, among other organizations. *Id.* at § 5304(l).

<sup>35</sup>[GAO-22-104241](#).

<sup>36</sup>Through Interior's Tribal-Interior Budget Council (TIBC), tribal leaders provide input on certain Interior components' initial budget request submissions. TIBC uses results of regional and national tribal program priority rankings to determine a budget strategy, develops a tribal budget submission, and presents the results to the Assistant Secretary for Indian Affairs.