

**Bureau of Trust Funds Administration**

**CONTINGENCY PLAN**

**September 2025**



**Department of the Interior**  
**Bureau of Trust Funds Administration**  
**Contingency Plan for a Potential Lapse in Appropriations**  
**September 2025**

**Overview**

The Bureau of Trust Funds Administration (BTFA), a bureau within Indian Affairs at the U.S. Department of the Interior (DOI), manages over \$9 billion in trust funds for Native American beneficiaries, disbursing more than \$1 billion annually. As part of a broader transition to a leaner, more efficient workforce, BTFA remains guided by the Administration's commitment to efficiency, stewardship, and service to the American people. In addition to investment management, BTFA safeguards millions of original historical records documenting the Federal government's trust responsibilities to Native Americans, ensuring both fiscal responsibility and preservation of the Nation's history at the American Indian Records Repository.

**Orderly Shutdown**

If the Contingency Plan is activated, BTFA will follow established procedures to ensure an orderly suspension of operations while maintaining excepted and exempt functions.<sup>1</sup> Notification will be provided to all employees and on-site contractors through office-specific internal telephone trees, email, and/or website postings. The BTFA Chief of Staff will implement these procedures. Additionally, BTFA will utilize the Mass Notification Emergency Alert System—available to all Indian Affairs—to communicate changes in operating status via the web, voice call, or mobile application.

Within 24 hours prior to a potential shutdown, BTFA will:

1. Advise all employees and contractors of developments and provide final guidance.
2. Prepare and distribute furlough letters and supplementary information to Deputy Bureau Directors, managers, or their designees.
3. Direct all employees and on-site contract personnel to report to duty the next business day after the shutdown or upon returning from scheduled leave for instructions and shutdown activities. Most employees are expected to complete these activities within four (4) hours, though some may require eight (8) to sixteen (16) hours. Furloughed employees will provide necessary notices and contact information, secure files, complete time and attendance records, and otherwise prepare to preserve their work.
4. Determine which contracts may continue and notify contractors of their status. Fully obligated contracts may continue without government employee supervision if contractor performance is not dependent on government assistance, acceptance, or similar support.
5. Instruct employees to monitor local and national news, as well as OPM, DOI, and BTFA public websites, for updates on appropriations and return-to-work instructions.
6. Ensure sufficient HR staff remain available to process benefits, insurance, and payroll data, and ensure lead timekeepers are available to assist non-furloughed supervisors and managers so hours are recorded accurately as exempt, excepted, or furloughed.

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<sup>1</sup> Employees participating in the Deferred Resignation Program whose resignation dates extend beyond September 30, 2025 may be exempt to the extent there are sufficient available balances, otherwise they will be furloughed.

## **Lapse Plan Summary Overview**

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Estimated time (to nearest half day) required to complete shutdown activities:	0.50
Total number of agency employees expected to be on board before implementation of the plan:	296
Total number of agency employees expected to be furloughed under the plan (unduplicated count):	255
<b>Total number of employees to be retained under the plan for each of the following categories (may include duplicated counts):</b>	
Compensation is financed by a resource other than annual appropriations:	41
Necessary to perform activities expressly authorized by law:	0
Necessary to perform activities necessarily implied by law:	21
Necessary to the discharge of the President's constitutional duties and powers:	0
Necessary to protect life and property:	20

### **Brief summary of significant agency activities that will continue during a lapse:**

In the event of a lapse in appropriations, BTFA will implement its Contingency Plan to ensure the continuous performance of excepted and exempt functions necessary for the protection of human life and property, and the security of trust assets. Excepted personnel may activate furloughed personnel to provide excepted functions as required. BTFA does not anticipate significant changes to operations if the lapse extends beyond five (5) days.

As required by the American Indian Trust Fund Management Reform Act of 1994 (Public Law 103-412), the Secretary of the Interior must account for daily and annual balances of Indian Trust Funds, invest individual Indian monies, and deposit interest into individual trust accounts. Positions necessary to meet these statutory obligations are identified as excepted. Apportioned carryover funds from prior year appropriations, when available, may be used to fund all 41 excepted positions during a lapse in appropriations.

BTFA leadership will manage and provide guidance to maintain the following critical functions:

- Protect the safety and well-being of employees and contractors, as well as the security of offices and property.

- Safeguard the life and property of Individual Indian Money (IIM) beneficiaries.
- Maintain system integrity and operability, including interfaces with the Trust Asset and Accounting Management System and Trust Fund Accounting System (TFAS).
- Approve and encode transactions, and ensure timely receipt, investment, and disbursement of trust funds to beneficiaries.
- Operate the Trust Beneficiary Call Center (TBCC).
- Budget planning and preparation for FY 2027.
- Continue litigation where continuances have not been granted, assess new charges requiring prompt judicial action, and provide litigation support necessary to protect the Federal government's interest in Tribal trust cases.
- Provide essential administrative and operational support through headquarters and field office staff to carry out excepted and exempt functions.
- Ensure lead timekeepers assist non-furloughed supervisors and managers in recording hours accurately as exempt, excepted, or furloughed to ensure proper pay during and after the shutdown.

### **Brief summary of significant agency activities that will cease during a lapse:**

The following activities will be suspended during a lapse in appropriations:

- Non-TBCC staff will not be available to respond to public inquiries or correspondence, including mail retrieval.
- Litigation support services for Tribal trust cases will be suspended unless court orders require continued action, in which case designated on-call staff will comply.
- Outreach and educational events will be cancelled.
- No FOIA requests will be processed.

### **Shutdown activities that will not be completed within one-half day:**

All shutdown activities are expected to be completed within one-half day.

The activation of the on-call staff depends on the need to work on vital BTFA projects and to perform fiduciary trust services, including the receipt, investment, and disbursement of trust funds to Indian beneficiaries.

### **Actions to Resume Orderly Operations**

#### **Communications**

During a lapse in appropriations, DOI will notify furloughed employees that it is permissible to take home government-issued computers and to check email periodically (e.g., twice daily), using "Shutdown Update" in the subject line. These updates may include notification of a change to exempt or excepted status, information on benefits and pay, updates on the anticipated duration of the shutdown, or other critical instructions.

#### **Flexibilities Available to Supervisors**

If an employee encounters an issue returning to work—such as previously scheduled leave—BTFA leadership encourages supervisors to allow the use of normal leave options, including accrued annual leave, compensatory time, or credit hours. Employees should coordinate this approval with their supervisor upon notification to return to duty. Where feasible and consistent with operational needs, BTFA will also maximize telework flexibilities during and following a shutdown. Employees currently on frequent or regular telework arrangements (e.g., maximum telework) will receive advance notice and guidance prior to being required to return to a physical duty station.

**Resuming Normal Operations**

Furloughed employees are expected to monitor public broadcasts and the Internet, including but not limited to DOI.gov, for updates on appropriations or continuing resolutions. Employees will be expected to report to regular duty on the next workday immediately following the end of the lapse in appropriations.