



OS, Trust Commission &lt;trustcommission@ios.doi.gov&gt;

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## Comment on Indian Trust

1 message

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Mon, Nov 25, 2013 at 10:06 AM

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I understand the two year study is coming to a close. I'm certain that plenty of comments and recommendations were received from all levels of audience and hope they serve the purpose for directing the administration of Indian trust.

My hope is that records management has been reviewed carefully since it is one of the elements leading to the Cobell litigation. Documentation of activities provides a picture of what an organization does. A strong and effective records management program provides an organization with: 1) stability, 2) responsibility, 3) accountability, 4) a history of where it has been and where it wants to go, 5) and a reflection as an organizational behavior in order to adjust to the economics and people. These and more are crucial to a better understanding of records management and its solid program development, implementation, and carrying out the federal government's responsibility to not only the American people but also to the Indian people and communities.

My observations includes:

- In the most recent reorganization of the Office of Trust Records (OTR), it has been placed under Program Management within the OST. The OTR is named an office to establish and maintain records management policies and procedures for all of Indian Affairs and OST. While it may have a sound business decision to place this program under Program Management, however, it gives little if not ineffective location to establish and implement a strong and viable records management program for the large organizations of Indian Affairs and OST.
- The records management should be (or must be) elevated to the highest level within any organization--particularly in the federal government. The history of the relationship between the Indian Affairs and OST has not been the best. There are power and political struggles. Records management policies should trickle down from the top, not from the bottom up. I truly believe the best and the most effective placement of the Office of Trust Records should be under the DOI records officer. Keep in mind that OTR also plays a significant role in the guidance of trust records management for other offices and bureaus within DOI. And, most importantly the Indian tribes.
- The current structure to develop and implement policies and procedures is a continuous struggle. Policies and procedures must go through layers of management and offices and in most cases people who have very little knowledge of records management make the ultimate decisions. Unfortunately, the length and time it takes for any policy and procedure to be implemented might be an entire fiscal year. As mentioned before, the struggle between the Indian Affairs and the OST contributes to a reluctant implementation of records management program.
- Electronic records management is rather moving quickly for establishment and implementation across DOI. Like any organizations IT and records management staff have a disconnect to recognize the principles and standards of managing and safeguarding records (including electronic records). Under the current structure of the OTR, it too will face reluctance in policy implementation.
- Lastly, we don't want to repeat history again. We want a strong, effective, and efficient records management program to guide Indian trust administration for the Office of the Special Trustee, Indian Affairs, Indian tribes, and other DOI offices and bureaus. We need guidance that will protect and safeguard the history of the Indian people. We need to ensure that we are accountable to the American people. Consider placing the records management program in the DOI organization where it will be more effective to carry out the Indian trust responsibilities.

Again, I am most certain that experts, individual Indians, agencies, organizations have contributed to the recommendations of the trust administration. And I trust that the recommendations have been considered thoroughly and intensely to a better and healthy future of organizations.

Respectfully,

E Garcia