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Description of document: Office of the Special Trustee For American Indians (OST)  
2012 Workforce And Diversity Plan, July 2011

Requested date: 2013

Released date: 23-September-2013

Posted date: 24-February-2014

Source of document: Freedom of Information Act Request  
Office of the Special Trustee for American Indians  
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Washington, DC 20240  
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United States Department of the Interior  
OFFICE OF THE SPECIAL TRUSTEE FOR AMERICAN INDIANS  
Albuquerque, NM 87109



September 23, 2013

Re: OST-2013-00056

We are writing today to respond to your request on behalf of the Office of the Special Trustee for American Indians (OST) for processing. Please find enclosed one CD containing one file consisting of 93 pages, which are being released to you in their entirety. These materials were located after a search reasonably calculated to uncover all relevant documents.

The Freedom of Information Act (FOIA) fee for the processing of your request is \$23.00, calculated as follows:

½ hour	Professional Search Time	@ \$10.50 per ¼ hour
1	CD	@ \$2.00 per CD

As a matter of policy, the Department of the Interior does not bill requesters for FOIA fees incurred in processing requests when their fees do not exceed \$50.00, because the cost of collection would be greater than the fee collected. See 43 C.F.R. 2.49(a)(1). Therefore, there is no billable fee for the processing of this request.

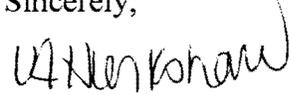
For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of FOIA. See 5. U.S.C. 552(c). This response is limited to those records that are subject to the requirements of FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

The letter constitutes OST's compliance with 43 C.F.R. 2.21(a): information about the Office of Government Information Services – which offers mediation services to resolve disputes between FOIA requesters and Federal Agencies – is available at <http://www.doi.gov/foia/news/guidance/index.cfm>.

This concludes our response to your request.

If you have any questions, please contact me by phone at 505-816-1645, by fax at 505-816-1334, by e-mail at "veronica\_herkshan@ost.doi.gov" or by mail at 4400 Masthead Street Northeast, Albuquerque, New Mexico, 87109.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Herkshan". The signature is written in a cursive, somewhat stylized font.

Veronica Herkshan, FOIA Officer, OST

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# 2012 Workforce Plan

Office of the Special Trustee for American Indians



*July 2011*

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**OST WORKFORCE AND DIVERSITY PLAN**  
July 2011**Executive Summary**

The Office of the Special Trustee for American Indians (OST) was established under the American Indian Trust Fund Management Reform Act of 1994 (Public Law 103-412). OST was created to improve the accountability and management of Indian funds held in trust by the federal government. As trustee delegate, the U.S. Department of the Interior (DOI) has the primary fiduciary responsibility to manage both Tribal trust funds and Individual Indian Money (IIM) accounts.

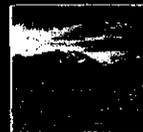
***The mission of OST is to perform fiduciary trust responsibilities to American Indian tribes, individual Indians, and Alaska Natives by incorporating a beneficiary focus and beneficiary participation while providing effective, competent stewardship and management of trust assets.***

The mission of OST is to perform fiduciary trust responsibilities to American Indian tribes, individual Indians, and Alaska Natives by incorporating a beneficiary focus and beneficiary participation while providing effective, competent stewardship and management of trust assets. OST achieves this by providing oversight, reform, and coordination of the policies, procedures, systems, and practices used by various agencies to manage Indian trust assets. This mission is integrally related to the U.S. Department of the Interior's goal of meeting its Trust, Treaty and other responsibilities to American Indians and Alaskan Natives and includes accounting, investing, disbursing, and reporting of funds for beneficiaries.

OST supports the DOI Strategic Plan - DOI Mission Area 3 to Advance Government-To-Government Relationships with Indian Nations and Honor Commitments to Insular Areas - Goal #1 to Meet Our Trust, Treaty, and Other Responsibilities to American Indians and Alaska Natives - and Strategy #2 Fulfill fiduciary trust.

OST fulfills this goal via the implementation of the following strategies in the Comprehensive Trust Management (CTM) Plan:

- Beneficiary services which are trusted, accurate, and responsive;
- Tribal self-governance and self-determination that increases participation in managing assets;
- Ownership information that is accurate, timely, and reliable;
- Trust fund assets management that meets fiduciary standards; and,



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- Land and natural resources management which maximizes return.

Reforming and re-engineering trust management has been necessitated by a number of factors. Among them are:

- Individual Indians, Tribes, and Congress have for some time expressed dissatisfaction with the trust management services provided by DOI.
- Multiple and often duplicative processes have been used to manage land and natural resource assets, track ownership, manage accounts and distribute funds.
- The expectations of beneficiaries at times exceed the limited fiscal resources and mandated requirements of the Trustee.
- The number of fractionated interests in land assets, which are growing at an exponential rate, and the number of IIM accounts that must be managed have excessively complicated processes and impacted potential trust liabilities and ultimately jeopardize the financial viability of some highly fractionated trust lands.

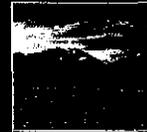
FY 2007 marked the completion of the conversion of the Bureau of Indian Affairs (BIA) legacy leasing systems to the Trust Asset and Accounting Management System (TAAMS) that interfaces with the Trust Funds Accounting System (TFAS) and the TAAMS title system. This conversion provides a single repository of ownership information for Interior-processed Indian trust resource and financial transactions.

By FY 2009, the Office of Trust Accountability was functioning in the universal support function mode as described in the Fiduciary Trust Model (FTM). Moving forward, Product Development Initiatives (PDI) is the group that will provide the oversight and direction for trust reform activities as well as continuously scanning the market for tools and strategies that can be implemented to improve the management of the Indian trust.

To date, OST has completed almost all of the key reforms needed to develop an integrated trust management system and provide improved trust services. Additional improvements have been important to ensure that fully integrated systems and reliable services meet OST and Departmental goals as well as fiduciary principles. Some of the remaining and/or ongoing actions are expected to continue indefinitely.

The FTM, once fully implemented, will enhance the Department's ability to provide more efficient and effective service to beneficiaries. The FTM creates a more efficient, consistent, integrated, and fiscally responsible business process. Regardless of the timing of the completion of ongoing and planned trust reforms and regardless of where these functions may ultimately reside in DOI, OST recognizes that it must continue to improve services to beneficiaries and to ensure efficient execution of its fiduciary trust responsibilities.

In December 2009, the departments of the Interior and Justice reached a settlement with the plaintiffs in the long-running Cobell class-action lawsuit regarding the federal government's management and accounting of more than 300,000 individual American Indian and Alaska Native trust accounts. A fund totaling \$1.5 billion will be distributed to class members to compensate them

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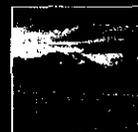
for their historical-accounting claims, and to resolve potential claims that prior the Department had mismanaged the administration of their trust assets. In addition, the settlement establishes a \$1.9 billion fund for the voluntary buy-back and consolidation of fractionated land interests. Dec. 8, 2009, the Department issued Secretarial Order No. 3292, Individual Indian Trust Management, which spells out the framework for a Secretarial Commission on Indian Trust Administration and Reform to recommend future management and administration of trust assets. Specifically, the duties of the Commission shall include:

1. Conducting a comprehensive evaluation of the Department's management and administration of the trust administration system (including a review of the report of a consultant required to be hired as part of the Reform effort);
2. Reviewing the Department's provision of services to trust beneficiaries;
3. Receiving input from the public, interested parties, and trust beneficiaries, which should involve conducting a number of regional listening sessions;
4. Considering the nature and scope of necessary audits of the Department trust administration system;
5. Recommending options to the Secretary to improve the Department's management and administration of the trust administration system based on information obtained from these activities, including whether any legislative or regulatory changes are necessary to permanently implement such improvements; and
6. Considering the provisions of the American Indian Trust Fund Management Reform Act of 1994 providing for the termination of the Office of the Special Trustee for American Indians, and making recommendations to the Secretary regarding any such termination.

To support the operation of the Commission, the Department will hire a management consultant to provide a comprehensive assessment of the Department's operation of the trust administration system, including:

1. Evaluating the strengths and weaknesses of both the monetary and non-monetary trust asset management activities of each entity involved in the Department's administration of trust asset management programs;
2. Identifying options for transferring, consolidating, or otherwise managing the trust fund and assets in an optimal manner to enhance accountability, responsiveness, efficiency and beneficiary service;
3. Reviewing the Department's prior reform efforts for effectiveness and to determine whether additional reforms are necessary; and
4. Considering the adequacy of the Department's current trust administration system audit functions and recommending options for improvement and possible expansion of such audits.

Because the Commission must complete its work within 24 months of its establishment, and because the Commission will consider potential options for transferring, consolidating, or managing the trust

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fund and assets, until the Commission issues its recommendations, notwithstanding any staff changes resulting from potential budget restraints, OST expects to maintain a “steady state” workforce at the agency’s current staff levels, skills, and geographic and organizational deployment until such time as changes are required by the Commission. OST will evaluate its contracts supporting ongoing activities and solidify its existing federal workforce to support on-going trust fund and accounting operations. Regardless of Commission recommendations, it is expected that the core functions performed within OST will continue to be required and will continue to be performed, either within OST or as part of a larger reorganization of Trust -related work within the Department. Accordingly, it is essential to maintain the skill-sets and competencies required to perform this work at a high level. Trust fund management and accounting activities will continue as designed under the reformed operations, in accordance with the Comprehensive Trust Management Plan and the FTM.

OST’s workforce efforts will primarily be focused on:

- Continuously improving and adjusting business processes;
- Continuing to gather, monitor, and evaluate staffing trends and staffing needs;
- Gathering new workload data such as time spent by RTAs and FTOs on outreach, acting as ombudsman, and other important duties that are evolving in these relatively new positions;
- Refining workforce data analysis;
- Maintaining an effective and skilled workforce;
- Developing skills and competencies; and,
- Reevaluating the contractor workforce as reform efforts progress, the Cobell settlement is implemented, and evaluations are completed.

These are examples of operations in which OST expects to experience declines in contractor activities over the next several fiscal years:

- Probate Cleanup
- Product Development Initiatives
- Data Quality and Integrity (DQ&I)
- Historical accounting

While OST identified several areas where workforce planning focuses future efforts, no significant workforce gaps were identified in the workforce data analysis or by key OST leadership. Staff levels appear to be stable and adequate to manage current workloads. Near-term, notwithstanding Secretarial Commission action, OST does not any increases in staff size and also expects limited hiring and backfilling. Minimal shifts in workload are expected as reforms progress. Most of the workload shifts involve the continuing gradual shifting of resources achieved through normal attrition and reallocation of vacancies and changes which may occur due to budget constraints.

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On December 14, 2010, Interior Secretary Salazar signed Secretarial Order #3309 which outlines steps that the Department will take to align IT resources under the Chief Information Officer at the Departmental level. Under the Order, bureaus or offices having a CIO are required to establish one Senior Executive as an Assistant Director for Information Resources (ADIR). Offices reporting directly to the Secretary (including OST) are not authorized to establish an ADIR, unless authorized by the CIO. The ADIR will replace the existing CIO position and serve a two-year term appointment. It is assumed that OST will fall under the Office of the Secretary ADIR. All IT procurement expenditures, over the micro-purchase level, must have the approval of the Office of the Chief Information Officer before funds are obligated via any approved method (e.g., purchase order, task order, reimbursable service agreement, etc.)

Within six months of this Order, the CIO will present to the Secretary a plan that details the execution of the transition of all IT Infrastructure to the organization, management, ownership, and control of the CIO. The transition will occur over a period not to exceed four (4) years. This plan will include the migration to the CIO of all of the IT services, personnel, and IT Infrastructure owned and operated by offices within DOI, and the integration of those services and systems necessary to sustain the geospatial activities of the Department within the Office of the CIO. OST must address the mandate to appoint an IT manager and work to fulfill Departmental IT changes as required by the CIO plan.

Notwithstanding changes resulting from the actions of the Secretarial Commission under Order 3292, the IT Transformation under Order 3309, and/or anticipated budgetary constraints, there is no significant new program-related hiring expected in the next two years at OST. OST expects to hire to the extent needed to maintain authorized staff levels and backfill jobs where applicable and as approved under the current hiring freeze. Hiring will likely be limited to the extent necessary to maintain current functional and operational capabilities. Assuming typical attrition trends prevail over the coming years (and given trends and workload assumptions, there is little reason to question this assumption), marginal levels of maintenance recruiting and hiring will be required mainly to backfill vacancies in the current workforce. As of June 2011, OST was operating under a hiring freeze in which all hiring was subject to review and approval of the Principle Deputy Special Trustee.

OST needs to improve its development, training and mentoring of current and future OST leaders. Managers and leaders in OST identified a need for training in several focus areas.

- Annual accounting training
- Leadership development training (Pathways to Leadership and SES Candidate Development Program)
- Introductory and advanced levels of TAAMS training
- Introductory training on the principles of human resources management
- Project management
- Comprehensive new employee orientation



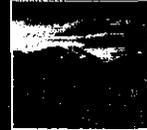
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There are not major competency gaps within OST that impact delivery of its mission and services. However, OST has identified a potential gap for the future in project management, negotiation skills, analytical skills, critical thinking, and oral communication.

## **SUMMARY OF GAPS ADDRESSED IN PLAN**

- Shifting resources – OST may need to shift and reallocate vacant positions and or reassign staff as necessary to increase focus on Cobell-Settlement related work while de-emphasizing other areas as reforms progress and conclude. Such reallocation should be considered at all grade levels, including in leadership and management positions. Additionally, it may be necessary to impose “soft hiring freezes,” where backfilling may be limited to a case-by-case review to ensure that reallocation is occurring where and when necessary.
- Career development – OST will assess the establishment of career paths to allow a steady upward development of skills and experience to ensure a stable skill and knowledge base throughout all levels of the agency.
- Retirement “At-Risk” occupations – though few are expected, OST will monitor and address retirement losses in occupations for which the employee has reached the thresholds at which employees tend to retire.
- Effective maintenance hiring and development – it will be vital that OST ensures that it maintains its level of skill and talent as it moves forward into coming years.
- Additional workforce training – OST can more rapidly acclimate new employees through employee orientation training programs. Training on TAAMS and TFAS will improve future staff effectiveness.
- Competency Modeling and skill gaps – OST will continue to participate in Departmental work on skills assessments and will explore development of competency models for mission critical occupations in the future. Additionally, OST will address potential skill gaps in project management and other competency areas.
- Access to Workforce Data – OST can more effectively manage its workforce with better access to real-time employee trend information.
- Risk management – OST will explore methods to strengthen its risk management capabilities.
- Succession planning - OST can also develop future leaders through programs such as the Pathways to Leadership program. OST can also begin to develop plans for succession as it progresses through reform efforts.
- IT Review and Restructuring - OST will adopt and implement programmatic and staffing changes as required to fulfill the requirements of Departmental IT Transformation.



**OST WORKFORCE AND DIVERSITY PLAN  
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## **ACTIONS PLANNED TO IMPLEMENT PLANNING**

### **Use of Human Resources Flexibilities**

- ⇒ OST will examine and utilize various HR flexibilities both for recruiting and retention to assist in maintaining the performance requirements of the agency and to address shifting resource requirements which may be required in the future.

### **Career Development**

- ⇒ OST will assess the establishment of career paths to allow a steady upward development of skills and experience to ensure a stable skill and knowledge base throughout all levels of the agency.

### **Monitoring Retirement “At-Risk” Occupations**

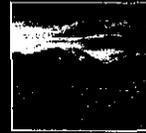
- ⇒ OST will monitor occupations deemed “at-risk” for retirement losses.

### **Training and Development**

- ⇒ OST will review available training sources and training needs and assess the extent to which employees (existing and new) can improve future staff effectiveness.

### **Developing and Leveraging Competencies**

- ⇒ OST will continue to participate in Departmental work on skills assessments and will explore the possible development of competency models for mission critical occupations in the future. Additionally, OST will address potential skill gaps in project management and other competency areas.



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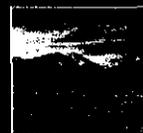


### **Access to Workforce Data**

- ⇒ **OST will seek methods to obtain better access to real-time employee trend information.**

### **Succession Planning**

- ⇒ **OST will utilize multiple strategies to identify leadership pipelines and to work to ensure it meets its needs for leadership succession when appropriate.**



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## Step I - OST Strategic Direction

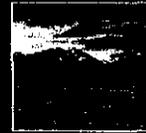
### WHAT IS THE OFFICE OF THE SPECIAL TRUSTEE FOR AMERICAN INDIANS?

The Office of the Special Trustee for American Indians (OST) was established under the American Indian Trust Fund Management Reform Act of 1994 (Public Law 103-412). OST was created to improve the accountability and management of Indian funds held in trust by the federal government. As trustee delegate, the U.S. Department of the Interior (DOI) has the primary fiduciary responsibility to manage both Tribal trust funds and Individual Indian Money (IIM) accounts.

OST maintains approximately 2,800 accounts for more than 250 Tribal entities with assets exceeding \$3.6 billion, and approximately 380,000 IIM accounts with assets of approximately \$470 million. Annually, more than \$532 million passes through the Tribal trust funds system, and over \$299 million passes through IIM accounts. This income is generated from the sale or rental of Indian-owned land and natural resources such as timber, and royalties from oil and natural gas exploration and production. Funds also are derived from interest earned on invested funds, as well as awards and settlements of tribal claims.

The mission of OST is to perform fiduciary trust responsibilities to American Indian tribes, individual Indians, and Alaska Natives by incorporating a beneficiary focus and beneficiary participation while providing effective, competent stewardship and management of trust assets. OST achieves this by providing oversight, reform, and coordination of the policies, procedures, systems, and practices used by various agencies to manage Indian trust assets. This mission is integrally related to the U.S. Department of the Interior's goal of meeting its responsibilities to American Indians and includes accounting, investing, disbursing, and reporting of funds for beneficiaries.

A full description of the agency's critical functions and offices is provided in Appendix C of this plan.



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## OST GOALS

The goals of OST include:

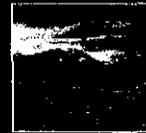
1. To protect and preserve Indian trust assets and receipt and accurately account for income due beneficiaries;
2. To obtain agreement with all Tribal and individual Indian account holders on the balances in their trust accounts in a manner that is fair to both the Indian community and the general public, does not impair or impede reform efforts, and does not result in reductions in Indian programs; and,
3. To provide timely and responsive beneficiary services to account holders.

Over the years, through various congressional and departmental directives, and organizational reforms of the management of the Indian trust, OST has progressed to be responsible for:

1. Financial activities for the fiduciary trust including the receipting of trust funds and accounting for, investing, and disbursing trust funds to individual and tribal beneficiaries;
2. Providing impartial estimates of value for a variety of specific real property interests on land owned in trust or restricted status;
3. Providing fiduciary trust services to beneficiaries and coordinating reform efforts to improve overall trust asset management and beneficiary services throughout DOI.

Today, the Department of the Interior has a fiduciary responsibility for the full life-cycle of trust accounts. In other words:

1. DOI is responsible for appraising Indian trust assets, establishing leases for a beneficiary (if the beneficiary chooses), knowing the terms of all leases, negotiating lease renewals and monitoring trust land for damages and trespasses. DOI also must record land title documents, leases, rights-of-way documents, and other necessary materials reflecting changes to Indian land titles.
2. Staff must receipt and invest trust funds received from the use of trust assets; post interest earned to each account; and, distribute funds to beneficiaries when authorized. Staff must also produce and distribute over a million statements of performance and oil and gas explanations of payment, annually, to beneficiaries.
3. When an Indian trust account holder dies, DOI is required to probate the estate—no matter if the assets are worth ten cents or \$10,000, and begin the entire process anew to manage trust lands and funds on behalf of all eligible heirs.



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### **Relation to DOI Strategic Plan**

OST supports the DOI Strategic Plan - DOI Mission Area 3 to Advance Government-To-Government Relationships with Indian Nations and Honor Commitments to Insular Areas - Goal #1 to Meet Our Trust, Treaty, and Other Responsibilities to American Indians and Alaska Natives - and Strategy #2 Fulfill fiduciary trust.

OST fulfills this goal via the implementation of the following strategies in the Comprehensive Trust Management (CTM) Plan:

- Beneficiary services that are trusted, accurate, and responsive;
- Tribal self-governance and self-determination that increases participation in managing assets;
- Ownership information that is accurate, timely, and reliable;
- Trust fund assets management that meets fiduciary standards; and,
- Land and natural resources management that optimizes return.

### **STATUS OF REFORMS CARRIED OUT BY OST**

Reforming and re-engineering trust management has been necessitated by a number of factors. Among them are:

- Individual Indians, Tribes, and Congress have for some time expressed dissatisfaction with the trust management services provided by DOI.
- Multiple and often duplicative processes have been used to manage land and natural resource assets, track ownership, manage accounts and distribute funds.
- The expectations of beneficiaries at times exceed the limited fiscal resources and mandated requirements of the Trustee.
- The number of fractionated interests in land assets, which are growing at an exponential rate, and the number of IIM accounts that must be managed have excessively complicated processes and impacted potential trust liabilities and ultimately jeopardize the financial viability of some highly fractionated trust lands.

OST's work to reform and improve the management of Indian fiduciary trust assets is captured in four key OST documents:



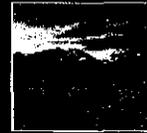
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- "As-Is" Report. The information contained in the "As-Is" Report was the foundation for the recommendations for re-engineered business processes that appear within the "To-Be" Model.
- "To-Be" Trust Model. Served as the focus point for the re-engineering of the way bureaus and offices perform their trust responsibilities and, ultimately, improve services provided to trust beneficiaries.
- The Comprehensive Trust Management (CTM) Plan. A strategic plan which defined and described the strategic direction of trust reform and clearly articulated DOI's commitment to fulfilling its trust responsibilities. The CTM, developed in 2003, has resulted in enhanced beneficiary services, reliable ownership information, and quality administrative services; improved the management of trust fund assets; and, increased support for Indian self-governance and self-determination.
- The CTM is the foundation of the Fiduciary Trust Model (FTM) which was approved by the Secretary in August 2004. Implementing the FTM includes major reengineering of trust processes. Trust data is being reconciled and validated within these Trust systems marking the near completion of several data cleanup projects. This effort between BIA and OST, utilizing contractors to supplement staff, continues the nationwide implementation of the enhanced trust beneficiary services envisioned by the FTM. The FTM offers business processes that deliver improved services to the individual Indian and tribal beneficiaries by standardizing, streamlining, automating, and working in partnership with the beneficiaries.

Implementing the FTM thus far has included:

- Implementing a commercial off the shelf (COTS) trust fund accounting system used by eleven of the twenty largest US bank holding companies;
- Creating a state of the art records management program including a records repository now containing more than 500 million pages of records;
- Developing handbooks and desk operating procedures that document standardization and streamlining of business processes;
- Hiring 12 Bureau of Land Management (BLM) Indian Land Surveyors, located in each Bureau of Indian Affairs (BIA) regional office and initiating the Certified Federal Surveyor program to certify licensed private surveyors to perform federal surveying activity with oversight by BLM;
- Establishing the division of Indian Probate Hearings within the Office of Hearings and Appeals (OHA) to provide a single point of adjudication for Indian probates;
- Hiring Regional Trust Administrators and Fiduciary Trust Officers to serve as the primary point of contact for beneficiaries;
- Opening the Trust Beneficiary Call Center;

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- Enhancing beneficiary performance statements with land asset and encumbrance information;
- Implementing centralized commercial lockbox operations;
- Establishing BIA lockbox liaison positions to expedite exception processing;
- Identifying and implementing trust-related skills models for hiring and training fiduciary trust professionals;
- Developing teams for updating federal regulations in support of the FTM;
- Adding a minerals valuation unit to National Business Center's Appraisal Services Directorate; and,
- Completing the conversion of the BIA legacy leasing systems to the TAAMS that interfaces with the TFAS and the TAAMS title system. This conversion provides a single repository of ownership information for Interior-processed Indian trust resource and financial transactions;
- Establishing, maintaining and enhancing an electronic fiduciary trust library.

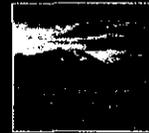
Beginning in FY 2008, reengineering was composed of continuous improvement teams which identified the need for further revised business processes, enhanced automated data systems, standard operating procedures, handbooks, validated metrics, desk operating manuals and new skills training. This process was and remains essential to keeping processes streamlined and utilizing the most cost effective technology. In addition, software solutions have been and are being developed for a number of reasons. Among them are oil and gas processing, and validation of title information for non-income producing land assets. Software to convert data from the old Minerals Royalty and Accounting Distribution system to TAAMS has been implemented. However, a comprehensive effort to validate the title information for non-income producing land assets remains to be is has never been started. Validation is necessary to ensure accuracy in financial reporting to account beneficiaries.

By FY 2009, the Office of Trust Accountability was functioning in the universal support function mode as described in the Fiduciary Trust Model (FTM). Moving forward, Product Development Initiatives (PDI) is the group that will provide the oversight and direction for trust reform activities as well as continuously scanning the market for tools and strategies that can be implemented to improve the management of the Indian trust.

To date, OST has completed almost all of the key reforms needed to develop an integrated trust management system and provide improved trust services. Additional improvements have been made to ensure that a fully integrated system and reliable services are meeting OST and the Department's goals as well fiduciary principles. Some of the

remaining and/or ongoing actions (such as training, upgrading software, evaluation of business processes using evolving technology, reengineering business processes, updating directives,

***OST has completed almost all of the key reforms needed to develop an integrated trust management system and provide improved trust services***

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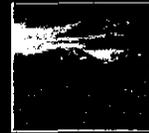
continuing account discrepancy clean up, maintaining key quality assurance controls, etc.) are expected to continue indefinitely to maintain the highest level of performance possible.

In December 2009, the departments of the Interior and Justice reached a settlement with the plaintiffs in the long-running Cobell class-action lawsuit regarding the federal government's management and accounting of more than 300,000 individual American Indian and Alaska Native trust accounts. A fund totaling \$1.5 billion will be distributed to class members to compensate them for their historical-accounting claims, and to resolve potential claims that prior U.S. officials had mismanaged the administration of their trust assets. In addition, the settlement establishes a \$1.9 billion fund for the voluntary buy-back and consolidation of fractionated land interests. Dec. 8, 2009, the Department issued Secretarial Order No. 3292, Individual Indian Trust Management, which spells out the framework for a Secretarial Commission on Indian Trust Administration and Reform to recommend future management and administration of trust assets. Specifically, the duties of the Commission shall include:

1. Conducting a comprehensive evaluation of the Department's management and administration of the trust administration system (including a review of the report of a consultant required to be hired as part of the Reform effort);
2. Reviewing the Department's provision of services to trust beneficiaries;
3. Receiving input from the public, interested parties, and trust beneficiaries, which should involve conducting a number of regional listening sessions;
4. Considering the nature and scope of necessary audits of the Department trust administration system;
5. Recommending options to the Secretary to improve the Department's management and administration of the trust administration system based on information obtained from these activities, including whether any legislative or regulatory changes are necessary to permanently implement such improvements; and
6. Considering the provisions of the American Indian Trust Fund Management Reform Act of 1994 providing for the termination of the Office of the Special Trustee for American Indians, and making recommendations to the Secretary regarding any such termination.

To support the operation of the Commission, the Department will hire a management consultant to provide a comprehensive assessment of the Department's operation of the trust administration system, including:

1. Evaluating the strengths and weaknesses of both the monetary and non-monetary trust asset management activities of each entity involved in the Department's administration of trust asset management programs;
2. Identifying options for transferring, consolidating, or otherwise managing the trust fund and assets in an optimal manner to enhance accountability, responsiveness, efficiency and beneficiary service;

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3. Reviewing the Department's prior reform efforts for effectiveness and to determine whether additional reforms are necessary; and
4. Considering the adequacy of the Department's current trust administration system audit functions and recommending options for improvement and possible expansion of such audits.

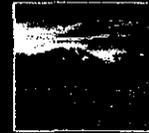
Because the Commission must complete its work within 24 months of its establishment, and because the Commission will consider potential options for transferring, consolidating, or managing the trust fund and assets, until the Commission issues its recommendations, OST expects to maintain a "steady state" workforce at the agency's current staff levels, skills, and geographic and organizational deployment until such time as changes are required by the Commission. OST will evaluate its contracts supporting ongoing activities and solidify its existing federal workforce to support on-going trust fund and accounting operations. Regardless of Commission recommendations, it is expected that the core functions performed within OST will continue to be required and will continue to be performed, either within OST or as part of a larger reorganization of Trust -related work within the Department. Accordingly, it is essential to maintain the skill-sets and competencies required to perform this work at a high level. Trust fund management and accounting activities will continue as designed under the reformed operations, in accordance with the Comprehensive Trust Management Plan and the FTM.

OST's workforce efforts will primarily be focused on:

- Continuously improving and adjusting business processes;
- Continuing to gather, monitor, and evaluate staffing trends and staffing needs;
- Gathering new workload data such as time spent by RTAs and FTOs on outreach, acting as ombudsman, and other important duties that are evolving in these relatively new positions;
- Refining workforce data analysis;
- Maintaining an effective and skilled workforce;
- Developing skills and competencies; and,
- Reevaluating the contractor workforce as reform efforts progress, the Cobell settlement is implemented, and evaluations are completed.

These are examples of operations in which OST expects to experience declines and/or shifts in contractor activities over the next several fiscal years:

- Probate Cleanup.
- Product Development Initiatives



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- Data Quality and Integrity (DQ&I)<sup>1</sup>
- Historical Accounting

While OST identified several areas where workforce planning focuses future efforts, no significant workforce gaps were identified in the workforce data analysis or by key OST leadership. Staff levels appear to be stable and adequate to manage current workloads. Near-term, notwithstanding Secretarial Commission action, minimal shifts in workload are expected as reforms progress. Most of the workload shifts involve the continuing gradual shifting of resources achieved through normal attrition and reallocation of vacancies.

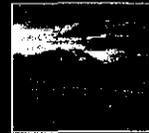
On December 14, 2010, Interior Secretary Salazar signed Secretarial Order #3309 which outlines steps that the Department will take to align IT resources under the Chief Information Officer at the Departmental level. Under the Order, bureaus or offices having a CIO are required to establish one Senior Executive as an Assistant Director for Information Resources (ADIR). Offices reporting directly to the Secretary (including OST) are not authorized to establish an ADIR, unless authorized by the CIO. The ADIR will replace the existing CIO position and serve a two-year term appointment. It is assumed that OST will fall under the Office of the Secretary ADIR. All IT procurement expenditures, over the micro-purchase level, must have the approval of the Office of the Chief Information Officer before funds are obligated via any approved method (e.g., purchase order, task order, reimbursable service agreement, etc.)

Within six months of this Order, the CIO will present to the Secretary a plan that details the execution of the transition of all IT Infrastructure to the organization, management, ownership, and control of the CIO. The transition will occur over a period not to exceed four (4) years. This plan will include the migration to the CIO of all of the IT services, personnel, and IT Infrastructure owned and operated by offices within DOI, and the integration of those services and systems necessary to sustain the geospatial activities of the Department within the Office of the CIO. OST must address the mandate to appoint an IT manager and work to fulfill Departmental IT changes as required by the CIO plan.

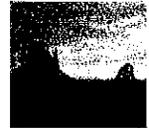
Notwithstanding changes resulting from the actions of the Secretarial Commission under Order 3292, the IT Transformation under Order 3309, and/or anticipated budgetary constraints, there is no significant new program-related hiring expected in the next two years at OST. OST expects to hire to the extent needed to maintain authorized staff levels and backfill jobs where applicable and as approved under the current hiring freeze. Hiring will likely be limited to the extent necessary to maintain current functional and operational capabilities. Assuming typical attrition trends prevail over the coming years (and given trends and workload assumptions, there is little reason to question this assumption), marginal levels of maintenance recruiting and hiring will be required mainly to backfill vacancies in the current workforce. As of June 2011, OST was operating under a hiring freeze in which all hiring was subject to review and approval of the Principle Deputy Special Trustee.

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<sup>1</sup> DQ&I historically assisted the BIA with reconciliation/validation of trust data. As the data requiring reconciliation/validation decreased, so did the funding. Currently most of the DQ&I funding supports the post quality assurance work performed on trust data which is the only known nationwide key control in place for the BIA. TA is also currently planning to bring several projects in-house; oil and gas reconciliation, Youpee project, Multiple Owner ID Project and OHTA SDA project.



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In keeping with the FTM, OST will continue to deliver the following work efforts:

- Continuing to work with BIA to convert the legacy software systems to TAAMS leasing module interfacing to TFAS. This has been completed for BIA agencies. Tribally compacted and contracted programs have not been completed.
- Continuing to address the reconciliation of the number of probates in various systems, as well as ongoing regulatory initiatives to improve and streamline probate processes.
- Continuing to address the backlog of appraisal requests on trust land, training and certification of appraisers, and improving the tracking of appraisal status.
- Extending access to reformed DOI information systems, and training opportunities, to tribes to build their capacity for operating trust programs under PL 98-638 agreements.
- Expanding training opportunities for Indian Affairs employees and tribes to provide effective program management.
- Supporting DOI's efforts to improve land management for tribes and individuals including the use of advanced technologies.
- Continuing to produce new informational brochures and other materials.
- Continue efforts to move from paper checks to electronic funds transfers including the use of prepaid cards similar to those used by the military, state unemployment agencies, child support systems, and soon to be used by the Social Security Administration. OST currently has 30,000 account holders enrolled in the debit card or direct deposit programs.

## **OTHER FACTORS DRIVING REFORM**

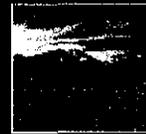
While OST is under specific statutory requirements to provide oversight, reform, and coordination of the management of Indian trust assets and faces significant work under the Cobell settlement, it is also subject to a number of external influences which are combining to drive all Federal agencies to think, plan, and act more strategically. Among them are:

- Government Performance and Results Act requirements;
- Presidential/Administrative initiatives;
- Government Accountability Office reports;
- OST Departmental Strategic Plan Goals as described above;
- Demographics, retirements, and age shifts in the labor force;



U.S. Department of the Interior

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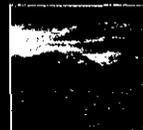


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- Competition for talent;
- Skills shifts toward hi-tech approaches and more rapid and reliable beneficiary service; and,
- Budget constraints resulting from shifts in national priorities.

All of these factors contribute to a need for strategic human capital planning and management.



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Step II - OST Supply, Demand, and Discrepancies

PERSONNEL DISTRIBUTION AND ALIGNMENT WITH MISSION

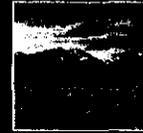
Staffing Overview

OST advances its mission with 692 Federal employees. The largest group of employees is located in Albuquerque, New Mexico. A small staff supports the Special Trustee in Washington, D.C. and all other personnel are located in over 70 field sites serving the beneficiaries. Additional support is provided by over 200 contractors (mostly in Probates, Product Development Initiatives, DQ&I, Beneficiary Call Center, and Office of Trust Funds Management.

The staffing overview below shows how OST staff is working with contractors to carry out OST's trust activities.

*NOTE: Information regarding the actual number of contractors is very difficult to accurately determine given that, by nature, some contracts may involve sub-contracting arrangements, or the use of intermittent-type contractors who "come and go" depending on work requirements. The following table depicts the number of contractors as accurately as possible for illustration purposes only.*

ORGANIZATION	FEDERAL EMPLOYEES
OFFICE OF THE SPECIAL TRUSTEE	2
OFFICE OF TRUST REVIEW AND AUDIT	20
OFFICE OF THE EXECUTIVE DIRECTOR, Office of Historical Trust Accounting**	1
CHIEF OF STAFF	3



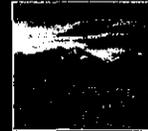
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ADMINISTRATIVE SUPPORT	6
DOCUMENT SEARCH, IMAGING, AND CODING	3
SDA DIVISION	2
TRIBAL DIVISION	8
LAND AND IIM DIVISION	2
IT SUPPORT/RECORDS MANAGEMENT	3
OFFICE OF PRINCIPAL DEPUTY SPECIAL TRUSTEE	12
OFFICE OF BUDGET, FINANCE AND ADMINISTRATION	10
BUDGET & FINANCE STAFF	6
FACILITIES SUPPORT STAFF	9
PLANNING AND ANALYSIS STAFF	1
TRUST SUPPORT STAFF	5
OFFICE OF EXTERNAL AFFAIRS	8
OFFICE OF CHIEF INFORMATION OFFICER	23
INFORMATION TECHNOLOGY SERVICES	18
OFFICE OF TRUST RECORDS	5
DIV REC POLICIES PROCED & TRAINING	2
BR OF RECORDS MANAGEMENT STANDARDS	7
BR OF SOUTHERN FIELD SUPPORT SERVIC	9
BR OF NORTHERN FIELD SUPPORT SERVIC	10
DIV RECORDS MGMT OPS - AIRR	2
BR RECORDS MGMT RESEARCH-AIRR	54
DEPUTY SPECIAL TRUSTEE - TRUST ACCOUNTABILITY	3
OFFICE OF TRUST TRAINING	4
OFC OF TRUST REGS, POLICIES & PROCEDURES	7
REENGINEERING STAFF	4
PRODUCT DEVELOPMENT INITIATIVES STAFF	10
TRUST PROGRAM MANAGEMENT CENTER	0
DQ&I	



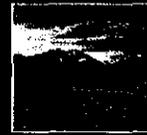
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	RISK MANAGEMENT	2
	DEPUTY SPECIAL TRUSTEE - -FIELD OPERATIONS	4
	OFFICE OF APPRAISAL SERVICES	5
	APPRAISAL SERVICES	59
	BENEFICIARY CALL CENTER	3
	REG FIDUCIARY TRUST ADMIN-REGION 1	3
	FIDUCIARY TRUST OFFICERS	7
	BENEF PROCESSING COMP	21
	REG FIDUCIARY TRUST ADMIN-REGION 2	2
	FIDUCIARY TRUST OFFICERS	7
	BENEF PROCESSING COMP	26
	REG FIDUCIARY TRUST ADMIN-REGION 3	2
	FIDUCIARY TRUST OFFICERS	14
	BENEF PROCESSING COMP	57
	REG FIDUCIARY TRUST ADMIN-REGION 5	3
	FIDUCIARY TRUST OFFICERS	9
	BENEF PROCESSING COMP	32
	REG FIDUCIARY TRUST ADMIN-REGION 6	2
	FIDUCIARY TRUST OFFICERS	12
	BENEF PROCESSING COMPS	29
	DEPUTY SPECIAL TRUSTEE-TRUST SERVICES	2
	OFFICE OF TRUST FUNDS MANAGEMENT	1
	DIVISION OF TRUST FUNDS ACCOUNTING	8
	BRANCH OF ACCOUNTING PROCESSING	49
	BRANCH OF ACCOUNTING SERVICES	15
	BRANCH OF COLLECTIONS	12
	BRANCH OF PROBATE	25
	DIVISION OF TRUST FUNDS INVESTMENTS	6
	TRUST REPORTING AND RECONCILIATION	4
	CURRENT RECONCILIATION STAFF	6
	REPORTING STAFF	6



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	692
** Office of Historical Trust Accounting was organizationally realigned to report to the Special Trustee for American Indians effective July 1, 2007.	

## SUPPLY - WORKFORCE ANALYSIS

This section provides an overview of the analysis conducted of the OST workforce. A detailed set of tables, charts and graphs, on which this analysis is based, is included in Appendix B of this plan.

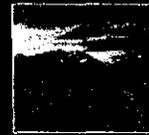
### Demographics

Since FY 2003, the size of the OST federal workforce has grown by 44% from 481 employees to 692 employees currently.

OST currently uses a number of contractors (presently approximated at over 200) to perform reform-related activities which are generally time-limited and will draw down as reforms conclude. For example, a number of contractors are currently working across the country on DQ&I work to clean up trust data as it is migrated into new trust management systems. PDI/DQI continually receives requests from BIA LTRO's and Agencies for assistance in cleaning up trust data. The magnitude of this clean-up work is difficult to project as it can involve tribe and land holdings. The complexity of each request varies, (i.e., as simple as verification of legal land description to encoding/corrections of legal land descriptions for highly fractionated interest in a tract of land) and could take anywhere from 2 months to 5 years or more. Additionally, OST has a number of contractors performing functions which are expected to continue after reforms are completed (such as OST's Beneficiary Call Center and its returned mail program to locate IIM account holders). These activities lend themselves well to contracting out and are generally more cost-effectively staffed with contractors than with permanent employees.

The largest number of OST employees in a grade are currently grade GS-07 (161 or 23.3%) followed by GS-14 (107, 15.5%), and GS-13 (96, 13.9%). These three grades constitute over one-half (52.7%) of all employees in all grades.

Nearly 25% of all OST employees work in series 0525 (Accounting Technicians). In all, 172 of the agency's 692 employees are in this series and occupation. The next largest series/occupation is the GS-343 Management and Program Analyst series with 61 employees. Following that are Fiduciary Trust Officers in series 1101 at 47 employees.



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In 2010, employee salaries stood at an average of \$72,569. The cumulative cost of salaries in FY 2010 was \$50 million. Assuming that the recently enacted pay increase freeze extends for the next two fiscal years, OST's annual salary costs will remain steady through FY 2013.

At the end of FY 2010, 95% of OST's workforce worked in field offices across the United States. While the Headquarters component of OST has doubled since FY 2007, it still represents only 5.1% of the entire workforce. Approximately 45% of OST's workforce (317 of 692) is located in Albuquerque, NM. All 35 GS-15 employees work in Albuquerque (22), Washington, DC (10), Lenexa, KS (2), and Anchorage, AK (1). Nearly 42% of the Albuquerque workforce (133 of 317) work in grades 13, 14, and 15 or senior executive positions.

### Gender, Race and National Origin, and Diversity

Female employees (475) outnumber male employees (217) by more than two to one. While females are 68.6% of the total OST workforce, they tend to be disproportionately represented in higher-graded jobs. Females are 33.3% of all Executive positions, 45.7% of GS-15, 41.1% of GS-14, and 57.1% of GS-13 positions. Males hold a higher number of higher-graded positions than females. Females tie or outnumber males in 17 of 24 occupational series in OST.

In accordance with the Indian Preference Act of 1934 (Title 25, USC Section 472), preference in filling vacancies is given to qualified Indian candidates. In OST, this form of hiring preference generally applies to positions which were moved intact to OST from BIA. Consideration is given to non-Indian applicants (status or reinstatement eligibles) in the absence of qualified Indian Preference eligibles (approximately 370 positions are covered by Indian Preference).

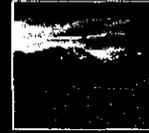
***OST's 2009 attrition rate was its lowest in seven years***

American Indian or Alaska Native is by far the most prevalent Race and National Origin designation in OST. This RNO group constitutes 76.6% of the OST workforce. The next highest RNO designation is white at 16.3%. The remaining RNO groups combined comprise only less than 8% of the total workforce.

American Indians represent 61% of all leadership (supervisory, managerial, and executive) positions. Among managers, American Indians represent 74%.

There are 59 veterans preference eligible employees in OST representing 8.5% of the workforce. The vast majority of these (62.7%) are entitled to 5 point preference in hiring. Only 22 employees qualify for other forms of veterans preference. According to OPM, throughout government, veterans comprise 25.8% of the workforce and 8.0% of the Civilian Labor force.<sup>2</sup> Veterans are 14.9% of the total department of Interior workforce. Thus, OST lags behind other Federal agencies and the Department in its employment of veterans.

<sup>2</sup> U.S. Office of Personnel Management's (OPM) Report on the Employment of Veterans in the Federal Executive Branch for Fiscal Year (FY) 2009.



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Almost half (30) of OST's veterans are in grades GS-12 through 15.

Persons with disabilities represent approximately 6% of the OST workforce. The disabilities include varying levels of vision problems and blindness, cancer recovery, diabetes, loss of hearing, severe distortion of limbs and/or spine, loss of ability to move or use one or both hands, etc.

Less than 1% of the OST workforce has a disability defined as a "targeted disability" by the Equal Employment Opportunity Commission.<sup>3</sup>

### **Losses, Attrition, and Related Trends**

Since the beginning of FY 2004, OST has lost an average of approximately 65 employees per year. Most losses between FY 2003 and 2010 came via resignations (40.7% of all losses). Less than 17% of all losses since 2003 have resulted from voluntary retirements.

519 employees have separated from OST (voluntarily and involuntarily) since the beginning of FY 2003. That is an average loss rate of 9.6% of the onboard workforce. 109 (21%) of all losses were the result of the expiration of time-limited appointments, removals, and terminations during new employee probationary periods.

Apart from all losses, OST's average attrition rate (non-agency initiated actions) since FY 2004 has dropped from 9.0% to 7.8%. The annual attrition rate was at its lowest in FY 2009 when it dropped to 6.4%. It has been below 7.5% for the last four FYs. The attrition rate in all of government is typically about 7%.

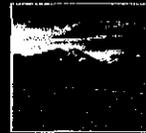
Separations in grades GS-04 and GS-05 accounted for 35.5% of all OST turnover during the period between the beginning of FY 2003 and the end of FY 2010. While currently, GS-07s are by far the most populous grade in OST (23.2%), this grade accounted for only 12.8% of all separations/losses. More than half (58.4%) of all OST turnover occurred in grades GS-07 and lower.

The largest number of employees in OST is in series GS-0525 Accounting Technician occupations (1). OST lost 49 (mainly through resignations) 0525 employees since the beginning of FY 2007. OST's next highest loss series was GS-0326 Office Automation Clerical and Assistance positions (37 losses).

From FY 2003 through 2010, 82 preference eligible veterans separated from OST. Approximately 31% retired, 23% resigned, and 24% transferred to other agencies.

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<sup>3</sup> Targeted disabilities, as defined by the Equal Employment Opportunity Commission (EEOC), are disabilities "targeted" for emphasis in affirmative action planning. These are: deafness, blindness, missing extremities, partial paralysis, complete paralysis, convulsive disorders, mental retardation, mental illness, and genetic or physical condition affecting limbs and/or spine. EEOC recognizes that some disabilities that are not targeted are nevertheless just as severe as or more severe than some disabilities that are targeted.



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### **New Hires**

Since FY 2003, OST has hired 488 employees. Most were hired as excepted service appointments. Excluding promotions, OST brought an average of 82 employees per year into the agency. As previously noted, the agency lost approximately 65 employees per year via all forms of separation.

During this same period (end of FY 2003 to end of FY 2010), OST's workforce size increased from 481 to 692; a gain of an average 35 new employees per year.

The majority of OST hires were entry level hires into grades GS-04, GS-05, GS-06, and GS-07.

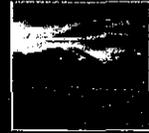
## **DEMAND**

### **Critical Business Processes and Future Organizational Alignment**

The FTM enhances the Department's ability to provide more efficient service to beneficiaries. The FTM creates a more efficient, consistent, integrated, and fiscally responsible business process. Regardless of the timing of the completion of ongoing and planned trust reforms and regardless of where these functions may ultimately reside in the DOI, OST recognizes that, to continue to improve services to beneficiaries and to ensure efficient execution of its fiduciary trust responsibilities, it must maintain a stable organizational structure and workforce even as it completes remaining or additional reform efforts.

OST's workforce efforts will primarily be focused on:

- Continuously improving and adjusting business processes;
- Continuing to gather, monitor, and evaluate staffing trends and staffing needs;
- Gathering new workload data such as time spent by RTAs and FTOs on outreach, acting as ombudsman, and other important duties that are evolving in these relatively new positions;
- Refining workforce data analysis;
- Maintaining an effective and skilled workforce;
- Developing skills and competencies; and,
- Reevaluating the contractor workforce as reform efforts progress and evaluations are completed.

**OST WORKFORCE AND DIVERSITY PLAN  
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It is assumed that OST will maintain a steady state of Federal staff levels with FTE reallocations where needed to address shifts within the agency's workload. When additional trust reform efforts are near completion and the Special Trustee has submitted the recommendation for the future of the agency, it will be necessary to then look at the extent to which certain functions might be consolidated, shared, or expanded, depending on the organizational locations to which any OST functions are re-located or reorganized at that time. It will be necessary to review those functions when decisions are made.

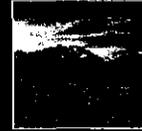
***OST recognizes that, to continue to improve services to beneficiaries and to ensure efficient execution of its fiduciary trust responsibilities, it must maintain a stable organizational structure and workforce even as it completes remaining reform efforts***

It is known, for example, that Call Center contractors will continue to perform call center activities much as they do today. Also, it is expected that information technology support will still be required to manage IT systems and to maintain user equipment and software. It is also likely that other areas may have recurring or on-going need to use contractors (such as to develop or deliver trust related training, or to assist with spikes in workload). OST cannot forecast these needs at this time, but can, with some certainty, project a significant reduction in contractors and a steady need for its current level of Federal staff.

**Future Programs for Which Contractor Support is Expected to Decline**

These are examples of operations in which OST has recently or expects to experience declines in contractor activities over the next several fiscal years:

- **Probate Cleanup:** The responsibility for directing overall probate cleanup efforts rests with BIA. OST oversees backlog elimination efforts; ensures coordination of policies, practices and systems; and provides guidance in identifying problems and potential solutions in the process of eliminating probate backlogs. The immediate goal of OST is to work with BIA to identify, reconcile, and align the probate information contained in TAAMS, TFAS, and BIA's Probate Tracking System. By accomplishing this, DOI's probate processing activity will be better monitored to help ensure probate work is completed and probate order backlog processing is timely identified and minimized. As probate clean up is resolved, this function will decline.
- **Product Development Initiative:** The Product Development Initiatives program provides support to new and reengineered processes, establishes policies, tests procedures and stabilizes processes prior to release to the program operations. Over time, procedures and policies will be documented and the functions of this office will convert to a continuous improvement function.
- **Data Quality and Integrity (DQ&I):** The DQ&I project is a trust data cleanup project where Critical Data Elements (CDE) are validated and/or corrected and Post-Quality Assurance

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reviews of system entries made into the BIA TAAMS are established and ongoing to help ensure updates to CDE's are accurate. CDE's are validated/corrected on a land tract by land tract basis with the validation/correction timeframe being the last title status report certification date or 15 years, whichever is earlier.<sup>4</sup>

- **Records Management:** A component of records management reform has been to centralize Indian Affairs records into one location, to create an electronic database of these collections, and to collect inactive records from BIA/OST offices that had become backlogged due to a combination of circumstances. The centralization has occurred, the database has been established, and the collection of backlogged records will be completed in the near future. Indexing of the backlogged records is being performed in-house by OST staff.

## GAPS

While OST identified several areas where future workforce planning efforts will focus, no significant workforce gaps were identified in the workforce data analysis or in interviews of key OST leadership and staff. Staff levels appear to be stable and adequate to manage current workloads. Minimal future shifts in workload are expected as reforms progress. Most of the workload shifts would involve the elimination of contractors currently used for reform-related tasks and in some cases, shifting resources (for example, OST will assess whether to shift positions from the Trust Program Management Center (TPMC) to Trust Services (TS) over time). Currently, 1 TPMC employee reports to Trust Services and another TPMC employee will be transferred when position descriptions are finalized. TA also currently has several positions in TPMC that are cross-trained to prepare for and ensure maximum efficiency and effectiveness when several currently contracted processes are brought in-house. It is assumed that this resource allocation will be gradual, and achieved through normal attrition and reprogramming of vacancies.

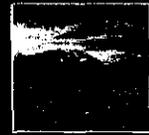
The workforce trends indicate relatively low attrition (though slightly above the Federal average). OST's attrition appears to be stable, fairly consistent, and does not represent a threat to mission critical operations or functions. Retirement projections are well within manageable ranges and do not appear to present a concern over the next five years.

Neither significant numbers of new hires nor additional full time equivalent positions are expected to affect OST's hiring trends in the foreseeable future. Contractors are providing flexible and time limited services to complete ongoing reform activities and future assistance will likely involve the use of contractors as needed to complete further reforms.

The chief issues facing the management of OST's human capital will revolve around:

- Retaining current talent;

<sup>4</sup> See prior footnote regarding DQ&I

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- Performing on-going maintenance hiring as needed to fill attrition-related vacancies;
- Continuing to train and develop current staff to perform in the changing trust management environment created by reform efforts;
- Building for the future workforce, regardless of where OST functions are housed; and,
- Shifting resources (possibly from areas such as Product Development Initiatives or other areas or from TPMC to TS) to move to a continuous improvement and risk management model as reforms progress and are validated.
- It may be necessary to impose “soft hiring freezes,” where backfilling may be limited to a case-by-case review to ensure that reallocation is occurring where and when necessary.

One area that OST will monitor is the lack of employees in grades GS-08, 09, 10, and 11 (generally considered to be grades of a developmental level, from which future journey-level workers tend to emerge). A large percentage of OST's workforce is in grades GS-07, and a large percentage in grades GS-12 and higher. OST will explore the possibility of building career development paths from the GS-07 grades to higher-graded positions.

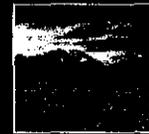
## Retirements

### Key Concepts for Evaluating Retirement Data

Retirement eligibility is often used as a gauge against which future separations are forecast. In recent years in the Federal government, it has gained attention as reports surfaced that large percentages of employees would reach eligibility for retirement simultaneously, causing a massive and sudden loss of talent. Including retirement eligibility figures is important in workforce planning as retirements can create a potential loss area for which the agency may have minimal control. However, it is important to first define what is meant by eligibility, and then to draw a clear distinction between retirement eligibility and actual retirement projections.

Eligibility for regular optional retirement is determined as follows:

1. CSRS covered personnel are eligible to retire immediately if they are:
  - (a) At least 55 years of age, and have at least 30 years of service;
  - (b) At least 60 years of age, and have at least 20 years of service; or,
  - (c) At least 62 years of age, and have at least 5 years of service.
2. FERS covered personnel are eligible to retire immediately if they are:



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- (a) At least 55 years of age<sup>5</sup>, and have at least 10 years of service; or,
- (b) At least 62 years of age, and have at least 5 years of service

*Note: In order to be eligible for early retirement, an agency either must first seek and receive approval from the Office of Personnel Management (OPM) during periods of major workforce restructuring or downsizing or the employee must face the abolishment of his/her job or reassignment outside the commuting area. In other words, the employee faces an involuntary action which triggers the retirement. In both cases, employees are not eligible for retirement until some external cause or event, generally of an involuntary nature, requires the creation of this earlier eligibility. Thus, early retirements are not practical considerations in forecasting future retirement losses.*

Organizations sometimes tend to rely too heavily on analyses of employee eligibility for retirement without making a clear distinction between eligibility for retirement and the actual retirement trends. In most cases, employees work well beyond the date that they reach initial entitlement to an annuity.

**Forecasting**

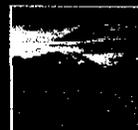
**OST Annual Average Retirement Rate FYs 2003 through 2010**

Since the beginning of FY 2003, 98 OST employees have voluntarily retired (an average rate of 2.1% per year).

FY	Headcount	Retirements	Rate
2003	481	10	1.9%
2004	523	9	2.3%
2005	575	12	2.4%
2006	600	14	3.0%
2007	633	18	1.7%
2008	635	11	1.3%
2009	686	8	2.3%
2010	692	16	1.9%
Total and Average		98	2.1%

Currently, 12.3% of the OST workforce (85 employees) have reached the age and service required to qualify for retirement.<sup>6</sup> These employees are both eligible and entitled to separate with an annuity at any time they chose. Of these 85 employees, 15 have been eligible to retire for more than five years.

<sup>5</sup> Or Minimum Retirement Age (MRA) if born after 1948.



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In the next five years, an additional 103 employees will reach the age and service requirements for retirement eligibility.

**5 Year Retirement Projection**

According to OPM retirement data, the average age and length of service at which employees actually separate for voluntary retirement are 60.4 years of age and 29.3 years of service. By the end of FY 2011, 27 employees will have reached this threshold. By 2015, an additional 48 will reach this threshold for a total of 75. Using OST's average annual retirement rate (see Table entitled "OST Annual Average Retirement Rate FYs 2003 through 2010"), 2.1%, it can be estimated that 75 employees could retire in the next 5 years. This is supported by the calculation (above) of those "at risk" to retire. This is well within a manageable range for OST.

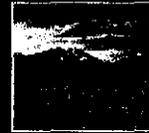
**Projected Retirement "At Risk" Positions**

OST has identified 75 positions in which employees will meet the threshold at which employees typically tend to retire, based on Governmentwide trends. It is important to note that very few leadership positions are at risk in the next five years. In fact, between now and 2015, only seventeen employees in leadership occupations will be beyond 60.4 years of age and 29.3 years of service. While these positions can be termed "at risk" in terms of the employees having reached the governmentwide average age and length of service for actual retirements, this table also makes it clear that OST does not face significant losses of large numbers of leaders or managers (or staff, in general) due to retirements in the next five years. This table shows a sample of the occupations most likely to see retirements.

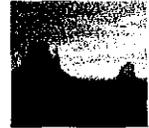
All Employees "At Risk"

SERIES	OCCUPATIONAL TITLE	LIKELY
525	ACCOUNTING TECHNICIAN	27
301	MULTIPLE	14
343	MANAGEMENT AND PROGRAM ANALYST	7
1101	FIDUCIARY TRUST OFFICER	6
1171	APPRAISER	5
503	ACCOUNTS MAINTENANCE	4
340	MULTIPLE	3
OTHER	Series with fewer than 3 employees likely to retire	9
Total		75

<sup>6</sup> Retirement eligibility was calculated based on having 20 years of service by age 60 or 5 years of service by age 62 for CSRS and FERS employees or 30 years of service at age 55 years for CSRS. MRA+10 and was not calculated as employees reaching MRA+10 are unlikely to retire given the small amount of the annuity they would receive.



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Leadership Positions "At Risk"

SERIES	OCCUPATIONAL TITLE	LIKELY
301	MULTIPLE	4
1101	FIDUCIARY TRUST OFFICER	4
340	MULTIPLE	3
343	MANAGEMENT AND PROGRAM ANALYST	3
OTHER	Series with fewer than 3 employees likely to retire	5
<b>Total</b>		<b>19</b>

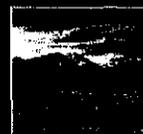
Using the typical age and service for Federal retirements (at least 60.4 years of age and 29.3 years of service), the table above shows the 19 leadership occupations (supervisors, managers, and executives) "at risk" or most likely to see retirements between now and September 30, 2015. These "at-risk" positions should be monitored as potential losses, and should also be assessed for potential loss of institutional knowledge, competency gaps, and program continuity.

### Future Expected Hiring

Notwithstanding changes resulting from the actions of the Secretarial Commission under Order 3292, the IT Transformation under Order 3309, and/or anticipated budgetary constraints, there is no significant new program-related hiring expected in the next two years at OST. OST expects to hire to the extent needed to maintain authorized staff levels and backfill jobs where applicable and as approved under the current hiring freeze. Hiring will likely be limited to the extent necessary to maintain current functional and operational capabilities. Assuming typical attrition trends prevail over the coming years (and given trends and workload assumptions, there is little reason to question this assumption), marginal levels of maintenance recruiting and hiring will be required mainly to backfill vacancies in the current workforce. As of June 2011, OST was operating under a hiring freeze in which all hiring was subject to review and approval of the Principle Deputy Special Trustee.

### Training and Development Needs

Training and development of staff is an OST priority. Throughout the efforts to reengineer and improve business processes, OST has been aware of the need to identify training requirements for new and existing staff. Each FTM process has been broken down to the task level. The tasks were aligned with job functions that perform the tasks and level of knowledge and capability currently existing for each task. Those tasks that are already performed to standard require no additional training. New tasks or tasks that are not performed to standard require additional training. This training analysis documents the gap and identifies the tasks targeted for and provides recommendations on training delivery methodologies. Other training needs identified by staff and supervisors include better orientation for

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new employees, including supervisors and managers. OST needs to improve its development, training and mentoring of current and future OST leaders.

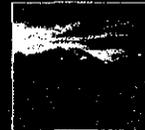
Managers and leaders in OST identified a need for training in several focus areas.

- Accounting technicians and office automation staff would benefit from annual accounting training, to expose them to the principles of accounting and to better position them to understand their role in ensuring accurate accounting for beneficiaries.
- Leadership development training would be beneficial to cultivate future leaders of OST and to begin building the succession for the future of the organization.
- All employees working with the TAAMS system should receive training at the introductory and advanced levels to improve the agency's use of the system.
- Most managers should receive some introductory training on the principles of human resources management, and particularly training on the federal staffing process, hiring authorities, hiring preference programs, development of vacancy announcement support materials, etc. This training could include aspects of hiring to maintain and improve diversity, as well as covering the concept of Indian Preference in hiring, veterans preference in hiring, automated hiring systems, etc.
- Project management is a skill that OST needs now and for its future. While some employees assisting with trust reform activities (such as specialists in the reengineering staff) are performing project management functions and are certified, few others in the agency have any training in project management specifically.
- OST does not have a comprehensive new employee orientation program. This type of training would be beneficial in getting new employees up to speed quickly so that they are fully functioning in their new positions as rapidly as possible.

## Assessment of Skills and Competencies

Competency data, to be used in conjunction with OST's Skills Models, has been gathered from interviews with supervisors/managers and senior employees, a review of critical job requirements, and input from the OPM competency database for federal occupations. The following competencies have been identified as cross-cutting core competencies across the agency:

- Project Management
- Critical Thinking
- Analytical Skills
- Oral Communication



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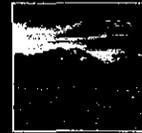
- Writing
- Interpersonal Skills
- Customer Service
- Flexibility
- Technical Competence
- Knowledge of Indian Trust

These other identified competencies are critical to meet job requirements unique to diverse occupations and positions in OST:

- Accounting
- Information Technology
- Marketing
- Media Development
- Contract Administration
- Public Relations
- Negotiation Skills
- Knowledge of Trust Management
- Knowledge of Governing Laws, Regulations, and Legal Decisions
- Budget Planning and Execution
- Knowledge of Policies, Procedures and Systems related to Occupation

For the OST leadership positions, the leadership competencies necessary for successful performance on the job are centered on the five Executive Core Qualifications:

- Leading People
- Leading Change
- Business Acumen
- Results Driven
- Building Coalitions and Communication



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**Agency Skills Modeling**

Skills models (or “competency models”) are tools used by leading organizations to help align people - with their unique skills and experiences - with the strategic needs of the business. As OST reengineered and implemented new business processes, OST undertook work to identify the most important skills to support these processes.

There are three different types of skills categories used for the FTM:

1. Core skills are elements that distinguish the agency from others. These relate to OST’s mission and what OST must do to accomplish it.
2. General skills are tools that people in all roles can use to accomplish work. These are things such as interpersonal skills or work habits that everyone needs to some degree, regardless of the employee’s particular job role. There were 19 general skills for all FTM job functions identified and included in the models.
3. Technical or functional skills are specialized skills, knowledge, and attributes needed for success within a business function or occupational group,

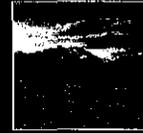
There were 127 Job Functions identified as having trust responsibilities and 20 Training Modules were identified and recommended for FTM processes.

The following skills profiles by OST job type were completed in FY 2006:

- OST = 7: Call Center Technician; Account Technician (Field Operations); Accounting Technician (Trust Services); Accountant; Fiduciary Trust Officer (technical/general skills); Deputy Regional Trust Administrator (technical/general skills); Regional Trust Administrator (technical/general skills).
- Management = 9: The following apply to OST: Deputy Regional Director (when there is no Agency office - BIA); Fiduciary Trust Officer (management skills); Trust Reform Officer; Program Analysis Officer; Director; Program Manager.

Progress has been made on 12 skills models across the trust functions in DOI. These skills models apply to OST:

- Trust Services – Accountants and Technicians
- Field Operations – Call Center and Account Technician
- Trust Administration
- Management



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- Probate<sup>7</sup> (this model has been validated)

BIA also participated in this work and, as a result, a number of other skills models were developed. The models shown above apply directly to OST as currently constituted.

### **Skill Gaps**

Based on the results of interviews with key supervisors and managers, there are not major competency gaps within OST that impact delivery of its mission and services. However, OST recognizes that the enhancement of skills and expansion of competency possession are important to OST's continuing improvement of operations. As the remaining reform activities are completed and new technologies introduced, information technology competencies in the various specialty areas (e.g., data management, network security, systems analysis and administration, operating systems, etc.) are critical. These competencies and skills may be enhanced on the part of OST employees and may also be addressed in the use of contingent workers who possess the required IT competency levels.

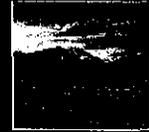
Other competencies for which OST has identified a potential gap for the future are project management, negotiation skills, analytical skills, critical thinking, and oral communication. While many OST employees are highly skilled in one or all of these competencies, there are areas within the agency where additional training and development may be needed to improve delivery of OST services. Also, OST seeks to expand and enhance the leadership competencies of its supervisors, managers and executives as well as those performing project manager roles.

### **Access to Workforce Data**

Agency leaders, executives, and managers recognize the need to devote time and attention to making human capital processes (such as workforce planning, competency assessment, recruitment, succession planning, and accountability) work well. However, they need good tools to do it. They need guidance on the steps that need to be taken to make these processes work. Among the most useful tools is basic access to workforce data for purposes of analysis, planning, and identification of future gaps. Work performed in preparation of this workforce plan revealed some gaps in the ability to readily access data for analyses. OST is exploring options to integrate multiple data sources to ensure ongoing access to comprehensive workforce data. This will enable the agency to identify the demographic make-up, numbers of employees and contractors, and other pertinent data related to the OST workforce overall and in each office. Access to appropriate data sources is critical to track changes and progress in meeting human capital goals.

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<sup>7</sup> The Probate skills model has been developed and validated. The other models, while developed, have not been validated.

**OST WORKFORCE AND DIVERSITY PLAN  
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The Risk Management Program has been steadily moving from a reactive approach of trying to achieve an acceptable level of risk to a proactive approach that maintains the appropriate risk level. The implementation of a more risk-based management focus is inherent in OST's work breakdown structures and program management and project planning. As implementation continues, more OST programs related to the trust reform initiatives are conducting risk assessments to ensure they are mitigating risks and moving towards the appropriate level of risk once the programs move to an operational and maintenance mode. OST intends to strengthen its risk management program by:

- Increasing the frequency of the self-assessment review cycles;
- Improving OST staff expertise based on the offering of risk management training;
- Enhancing the existing risk management tool (RM-PLUS) based on the recommendations of an OST user group; and,
- Aligning RM-PLUS with regulatory and legislative requirements for all divisions.

**Probate Clean Up**

It is common that an Indian trust owner has multiple heirs. DOI must probate Indian trust assets, and generally establish and manage a new account for each heir who will continue to receive trust income. Finding each eligible heir and transferring land ownership, title, and other proper documentation can take a number of years. In the last few years, the Department has focused efforts to address these backlogs by adding staff, changing responsibilities, and hiring contract help. It can cost DOI more than \$3,000 to probate one estate, no matter if the estate is worth 10 cents or \$100,000. Land fractionation exponentially increases the number of probates that must be processed. OST must continue to address the backlog of probates, as well as ongoing regulatory initiatives to improve and streamline probate processes.

OST must also continue to reconcile three data and records systems and provide recommendations to bring the three systems into alignment. In addition, OST must close out probate cases identified in the reconciliation process.

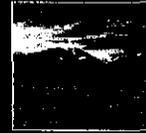
**Product Development Initiatives**

It is assumed that Product Development Initiatives in OST will continue to decline and this is evidenced by reductions in budget levels projected over future fiscal years. In future years, Product Development Initiatives will fall under the category of continuous improvement and product development.



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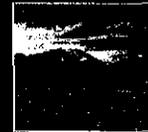
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PDI continues to work on Youpee and SDA's. In addition, PDI work on Multiple Owner ID and will bring oil and gas reconciliation, probate clean-up and Youpee clean-up in house beginning in FY 2012. Future initiatives include development f improved beneficiary services, i.e., kiosks, etc



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## **Step III – OST Workforce Plan Actions for Achieving and Maintaining a Highly Skilled and Diverse Workforce FY 2008 - 2011**

### **SUMMARY OF GAPS ADDRESSED IN PLAN**

Shifting resources – OST may need to shift and reallocate vacant positions and or reassign staff as necessary to increase focus on Cobell-Settlement related work. Such reallocation should be considered at all grade levels, and focus on continuous improvement, including in leadership and management positions. Additionally, it may be necessary to impose “soft hiring freezes,” where backfilling may be limited to a case-by-case review to ensure that reallocation is occurring where and when necessary.

Career development – OST will assess the establishment of career paths to allow a steady upward development of skills and experience to ensure a stable skill and knowledge base throughout all levels of the agency.

Retirement “At-Risk” occupations – though few are expected, OST will monitor and address retirement losses in occupations for which the employee has reached the thresholds at which employees tend to retire.

Effective maintenance hiring and development – it will be vital that OST ensures that it maintains its current level of skill and talent as it moves forward into coming years.

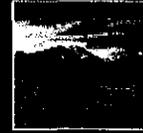
Additional workforce training – OST can more rapidly acclimate new employees through employee orientation training programs. Training on TAAMS and TFAS will improve future staff effectiveness.

Competency Modeling and skill gaps – OST will continue to participate in Departmental work on skills assessments and will explore development of competency models for mission critical occupations in the future. Additionally, OST will address potential skill gaps in project management and other competency areas.

Access to Workforce Data – OST can more effectively manage its workforce with better access to real-time employee trend information.

Risk management – OST will explore methods to strengthen its risk management capabilities.

Succession planning - OST can also develop future leaders through programs such as the Pathways to Leadership program. OST can also begin to develop plans for succession as it progresses through reform efforts.

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IT Review and Restructuring - OST will adopt and implement programmatic and staffing changes as required to fulfill the requirements of Departmental CIO restructuring.

## **MAINTENANCE HIRING AND DEVELOPMENT**

It will be vital that OST ensures that it maintains its current level of skill and talent as it moves forward into coming years. As noted previously, until critical decisions are made by the Secretarial Commission on the future structure and deployment of OST staffing to carry out the Cobell settlement, it will be imperative that OST maintains its current skills, and abilities to carry out ongoing work.

### **Strategies to Attract and Retain a Diverse and Talented Workforce**

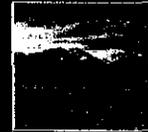
#### **Use of Human Resources Flexibilities**

- ⇒ **OST will examine and utilize various HR flexibilities both for recruiting and retention to assist in maintaining the performance requirements of the agency and to address shifting resource requirements which may be required in the future.**

While OST does not expect growth, losses, or recruitment or retention issues in the foreseeable future, it is still important to maintain a competitive edge when seeking new employees, or retaining on-board agency employees. OST can tap into numerous Human Resources (HR) flexibilities, tools, authorities, and programs to maintain and strengthen its human capital base. Introduction of these initiatives must be timed and used by the agency to coincide with various HR decisions as they arise (for example, staffing positions vacated by attrition, or hiring for new skill sets).

Among the tools, authorities, and programs, OST will consider using as appropriate are:

- Retention Allowances
- Relocation Bonuses
- Recruitment Bonuses
- Employee Referral Bonuses
- Relocation Expenses and Services
- Use of Innovative Hiring Programs
- Repayment of Student Loans

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- Tuition Assistance
- Use of Incentive Awards
- Liability Insurance

A detailed description of these flexibilities is provided in Appendix A of this plan.

Although there are costs associated with many of the cited flexibilities, there are usually greater returns on investment when management utilizes the flexibilities strategically with the objective of recruiting and retaining the best. Also, some of the cited flexibilities focus on building the pipeline for succession planning by recruiting and hiring the future tier of agency experts and leaders, both program and support services.

## **Building for the Future: Recruiting Strategies, Pipelines, and Tactics**

### **Targeted Recruitment Strategies and Tools**

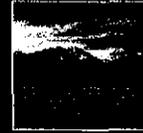
Among the key considerations in staffing within OST is the applicability of Indian Preference as a factor in assessment and selection of applicants. The Indian Preference Act of 1934 provides preference in filling vacancies to qualified Indian candidates. Each position is subject to the review of the Office of Solicitor to determine whether it is a covered position or not.

While Indian Preference is helpful in the selection of qualified applicants, ensuring that quality applicants apply is a function of recruiting, and not of staffing a vacancy. OST will explore the establishment of relations with colleges and universities which have historically offered strong programs in American Indian studies. Additionally, should future recruitment efforts support the need for college recruitment, OST will recruit from selected Hispanic Association of Colleges and Universities (HACUs), Historically Black Colleges and Universities (HBCUs), and institutions with large Asian Pacific Islander populations. OST also will take steps to ensure that recruitment for new hires will include targeting talent pools comprised of individuals with targeted disabilities.

### **Student Pipeline**

OST will focus on establishing a close working relationship with institution faculty and administrators at the types of colleges and universities noted above. By sharing expertise in Indian issues and tangentially exposing faculty and administrators to the agency's leading edge work on trust management and Indian trust programs, OST can hopefully gain referrals from universities of their top students seeking a work opportunity in the public sector.

An important and critical corollary to the targeted recruitment is the expanded use of internships and other student employment programs. OST seeks to encourage students to intern through the OST college relations efforts. OST plans to:



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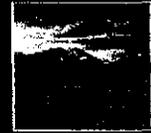
- Set up a process with schools to inform students and faculty members of the significant mission inherent in OST and encourage their interest in employment. This can foster both an improvement in recruitment opportunities as well as an added opportunity to improve agency outreach efforts.
- Educate managers and supervisors on the various student employment program flexibilities available under the Student Career Employment Program.
- OST's strategies for transitioning participants in student programs into full-time employment in the agency include:
  - Participation in appropriate Career Fairs designed to encourage students to seek employment with the agency;
  - Tracking of student hires under the internship and cooperative education components of the Student Career Employment Program to ensure conversion to permanent positions; and,
  - Building of leadership, mentoring, and coaching skills specific to student employees and volunteers.
- OST will develop a non-monetary incentive award program that rewards managers and supervisors for hiring and retaining students in the workplace.

**“Recruiting for a Career” versus “Posting a Vacancy”**

OST recognizes that, while not facing significant losses or expecting new major hiring initiatives, backfilling vacancies and attracting and maintaining a skilled and diverse workforce will require ongoing hiring. Posting a vacancy is not synonymous with recruiting. In short, filling a vacancy requires more than simply posting a vacancy announcement. OST plans to work with its servicing human resources office to explore expanded recruitment and outreach tools when filling positions.

By focusing on the candidates needed for a specific job, the proper recruitment initiatives, approaches, and incentives can be tailored to increase success in locating the best candidates for a vacant position. The following are sample practices that OST will use to tailor the recruitment initiative, approach, and/or incentive based on the need and the issues associated with filling positions.

- Maintaining open and mutually beneficial relations with tribes, tribal associations and groups, colleges and universities, and even local high schools where candidate pools exist that tend to feed OST occupations.
- Focus on hiring the "best" talent for OST from all groups, including female, minority, and disabled.
- “Selling” the career. Ensuring that front line staff conducting recruiting efforts and meeting potential applicants all fully understand the agency mission, the job being filled, and the type of candidate required to successfully perform the job. This will enable them to be fluent and



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conversant about the job opportunity with recruits. Also, ensure that front line recruiting staff represent the agency effectively and positively.

- Present as "BENEFITS" to potential applicants OST's mentoring programs, mobility agreements, various opportunities to rotate into different assignments, and the mission critical training program, in addition to the usual health, life, and retirement packages. These same "BENEFITS" can also be used to retain key skills and competencies.

### **Entry-Level Hiring**

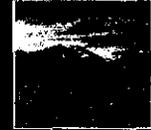
The balance between having senior experienced professionals to carry out the work and refreshing the work force through hiring at the entry level and developing future talent is always difficult. As of September 20, 2010, 43% (297 of 692) of the agency's workforce were in grades GS-12 and higher. Very few employees (73 of 692, 10.5%) are in grades GS-08 through GS-11. While not in and of itself an issue, OST will consider this fact when recruiting for future positions. This will ensure that there are enough skilled individuals in the pipeline to replace the experienced personnel as they separate or retire in future years. Currently, there is a large contingent of GS-7's on-board (161 of 692, 23.3%) representing a possible pool of future talent. OST can carefully monitor its grade distribution to ensure that a balance exists which facilitates upward progression to higher-graded jobs while still maintaining the entry and journey level staff needed to perform core functions.

## **Strategies to Retain Existing Human Capital Assets**

One of OST's challenges in the coming years will be to maintain and develop its current pool of employees. A key concept in the shift away from human "resources" management to human "capital" management is a shift in thinking of on-board employees as assets to be valued and preserved. Organizations vest considerable financial capital into recruiting, hiring, compensating, training, and developing their employees. Over time, these same employees gain additional value in the breadth of experience and knowledge they gain. Properly managed employees can perform work faster and more accurately with less supervision and greater success. In other words, the employee becomes an asset to the organization - an asset that is valuable and important to retain. OST recognizes the need to develop, leverage, and retain its human capital assets.

Accordingly, OST will:

- Where appropriate, offer retention bonuses to those OST employees possessing the competencies and skills that are most valuable and critical for the agency to retain; and,
- Carefully work to ensure that it protects the agency's human capital assets and retains employees required to efficiently and effectively deliver services to its beneficiaries.



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### **Retention Awareness**

OST's agency managers will identify critical skill losses or potential employee losses, utilizing recurring face-to-face retention awareness discussions to target hot-button retention issues and to scope out retention strategies to mitigate losses. These strategies may be in the form of employee individual development plans (IDPs), retention allowances, flexible work arrangements and accommodations, work life balance issues, etc.

### **Knowledge Capture**

Knowledge transfer and capture and/or knowledge retention are another essential component for ensuring on-going organizational performance. Strategies for knowledge capture can be as simple as holding discussions with subject matter experts and documenting processes, issues, or information or as complex as deployment of a knowledge management IT system.

Where most agencies may face significant knowledge capture issues, OST is developing new processes and methods for managing trust activities as it completes trust reform efforts. Thus, knowledge capture is inherent in reform efforts and most processes are being captured and institutionalized as reforms are rolled out. OST will remain vigilant for program or process areas in which it should make special accommodations to ensure knowledge capture in the future.

The establishment and implementation of a process to determine, office by office, the impact of the possible future loss of employee competencies and skills through retirements and other attrition will provide OST with in-depth data and understanding of potential knowledge loss in the future at the individual employee level. Placement in supervisory/managerial annual performance plans of a requirement to identify and track potential knowledge loss and to implement strategies to capture and retain knowledge will assist in ensuring that individual knowledge capture is a priority.

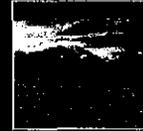
## **Career Development**

- ⇒ **OST will assess the establishment of career paths to allow a steady upward development of skills and experience to ensure a stable skill and knowledge base throughout all levels of the agency.**

## **Monitoring Retirement "At-Risk" Occupations**

- ⇒ **OST will monitor occupations deemed "at-risk" for retirement losses.**

Using a list of at-risk occupations developed as part of the analysis conducted for this plan as a starting point, OST will work with agency managers to plan for potential losses of employees in at-risk

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positions. OST will assess whether these at risk occupations represent a critical loss of knowledge or talent and will develop strategies to transition after the loss of any key personnel.

## TRAINING AND DEVELOPMENT

- ⇒ **OST will review available training sources and training needs and assess the extent to which employees (existing and new) can improve future staff effectiveness.**

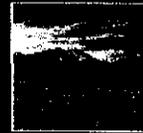
### Training/Development Needs

OST identified training needs in several focus areas and will work to make available the following:

- Annual accounting training;
- Leadership development training;
- TAAMS systems advanced training;
- TFAS advanced training;
- Introductory training on the principles of human resources management (mainly for agency supervisors and managers who may be selecting officials);
- New employee orientation; and,
- Project management skills development.

### Diversity Training on Critical Issues

OST is a unique agency. Usually agencies determine under-representation of a minority group by a comparison of that group's percentage in the civilian labor force to the percentage represented in the agency's workforce. However, by law, many of OST's positions are covered by Indian Preference. Moreover, because OST's mission is directed to American Indian tribes and individuals, it is appropriate for the agency workforce to reflect that part of America's population to the fullest extent possible. While Indian preference does not apply to all of OST positions, it does apply to many positions that were transferred intact to OST from BIA. Indian preference is a recruiting tool designed to assist in achieving an appropriately diverse workforce. OST is ensuring that all supervisors are fully knowledgeable of the application of Indian preference as well as the use of both Indian and veterans' preference in the selection process and the importance of ensuring accurate qualifications requirements are reflected in vacancy announcements.

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## DEVELOPING AND LEVERAGING COMPETENCIES

- ⇒ **OST will continue to participate in Departmental work on skills assessments and will explore the possible development of competency models for mission critical occupations in the future. Additionally, OST will address potential skill gaps in project management and other competency areas.**

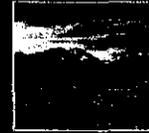
A competency, as defined by OPM and human resources experts, is a “an observable, measurable pattern of skills, knowledge, abilities, behaviors, and other characteristics needed to perform work roles or occupational functions successfully”. To implement the use of competencies, leading agencies have developed competency models for their mission-critical occupations and are expanding this effort to their non-mission critical positions. OST will explore building models for mission critical occupations which provide a roadmap for hiring, development, and successful performance in the job.

### Why Use Competencies?

Competency-based management of human capital represents a significant departure from the “old way” of recruiting, selecting, developing, and measuring the performance of employees. In the past, organizations focused on knowledge and skills to define the requirements for their employees even though knowledge and skills do not typically differentiate superior performers from average performers; nor do they accurately predict which candidates will become successful employees. Competencies reflect what a person must know to perform defined job tasks (knowledge, skills, and abilities otherwise known as KSAs) as well as behaviors that motivate the person and impact the accomplishment of goals and objectives. Thus, competencies go beyond job tasks and focus on more expansive and descriptive work roles. Competencies define the “whole person,” not just the technical capabilities of the person (or KSAs).

### Developing Models for Mission Critical Occupations

As noted previously, OST and BIA have developed skills models for a number of OST and BIA occupations. OST will explore the possibility of refining its existing skills models by developing competency models for its mission critical occupations with linkages to recruiting, hiring, development, and performance. In the interim, OST will factor in the competency data, gathered while preparing the workforce and diversity plans, when designing, revising and/or implementing human capital management programs and processes for its mission-critical occupations. The competency data covers general and technical requirements of these positions - thus, providing OST an opportunity to focus its recruitment, retention, promotion, and training efforts on a more “total person” methodology.

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- ⇒ **OST will seek methods to obtain better access to real-time employee trend information.**

Workforce planning should be an on-going, integral part of organizational business processes. Knowing your organization's supply of talent, demand for talent, and gaps, and ensuring that gaps are filled rapidly is the key to ensuring that the right people with the right skills are at the right place at the right time. HR data is one of the primary sources of accurate and usable data to make some of these determinations (such as trends, gaps, pipelines, etc.)

OST has an agreement with the Bureau of Ocean Energy Management, Regulation, and Enforcement (BOEMRE, formerly Minerals Management Service) to provide most of OST's required human resource services. That relationship will continue. However, it is critical to OST mission success that agency leadership has the necessary information to monitor progress on the goals of the workforce plan and make any required revisions. Additionally, DOI has recently begun work to standardize workforce planning efforts throughout the Department to allow better comparison, reporting, and roll up of plans. Therefore, the Office of Budget, Finance, and Administration will work to ensure appropriate and accurate workforce data/reports are available on an ongoing basis for future monitoring and implementation of workforce planning actions and will participate in DOI efforts, as appropriate, to develop better departmentwide planning outcomes.

**SUCCESSION PLANNING**

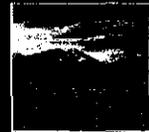
- ⇒ **OST will utilize multiple strategies to identify leadership pipelines and to work to ensure it meets its needs for leadership succession when appropriate.**

OST can also develop future leaders through programs such as the Pathways to Leadership program. OST can also begin to develop plans for succession as it progresses through reform efforts.

Succession planning is a systematic approach that an organization takes to identify a pipeline for future organizational leader, identify talent in that pipeline, and develop those candidates to be future leaders and managers.

At the departmental level, the Leadership Succession Strategy focuses on identifying and addressing agency leadership competencies so that continuity of leadership is ensured, knowledge is shared across the organization, and an environment of continuous learning is present.

According to OPM, "Succession planning recognizes that some jobs are the lifeblood of the organization and too critical to be left vacant or filled by any but the best qualified persons. Effectively



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done, succession planning is critical to mission success and creates an effective process for recognizing, developing, and retaining top leadership talent.”

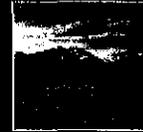
OST has a broad employee base at the GS-12 and higher level. At the end of FY 2010, 43% of the workforce was in grades GS-12 and above.

GRADE	FIELD	HQ	TOTAL
<b>EXEC</b>			
	11	1	12
<b>GS</b>			
15	25	10	35
14	98	9	107
13	93	3	96
12	44	3	47
11	19	3	22
09	35		35
08	15	1	16
07	159	2	161
06	38	1	39
05	78	2	80
04	40		40
03	1		1
<b>WAGE</b>			
5	1		1
<b>TOTAL</b>			
	657	35	692

OST will work with supervisors and managers to identify future candidates for management and leadership positions and work to develop opportunities to grow these employees to yield qualified applicants for both Field and Headquarters leadership positions.

OST will utilize the following strategies to identify pipelines and work to ensure it meets its needs for leadership succession when appropriate.

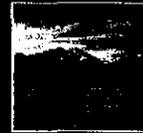
- OST will recruit from all sources to find the best and the brightest leaders with the key leadership competencies to fill the leadership positions.

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- OST senior leaders will continue to be actively involved in the recruitment, selection and development of Senior Executive Service Candidate Development Program (SESCDP) candidates.
- Seasoned senior executives will continue to actively participate in mentoring and educating SESCO DP candidates.
- OST Leadership is encouraged to seek recent SESCO DP graduates for detail assignments and for permanent SES positions within their organizations.
- Leadership development candidates will serve as an OST recruitment source.
- OST will leverage the Pathways to Leadership program to identify and develop future leaders.
- All DOI bureaus are required to update the workforce plans to incorporate a leadership succession strategy for their organization. This report responds to that requirement.
- OST will use rotational assignments and details to help prospective and new leaders gain a Departmental perspective.
- OST will determine if it is feasible to facilitate attendance at yearly leadership forums developed by DOI.
- OST will consider the use of retention, relocation and recruitment bonuses to maintain leaders.
- All SES performance plans will be reviewed to ensure that, as required, they carry an element requiring the development of subordinate managers and leaders.
- All SES members will work with subordinates in GS-12 through GS-15 supervisory roles to develop individual development plans which focus on continually building their leadership competencies.

It is not OST's objective to hire all leaders internally, but to hire the best leaders. However, OST does aim to meet the Department's basic succession planning goal of developing and maintaining internal candidates for leadership positions.

As OST's workforce analysis retirement profile analysis indicates, some changes in OST's management leadership in the future is possible. This change can present the organization with challenges, particularly if it is more sudden or extensive than projections indicate. Strong and high-performing organizations prepare for an eventual change in leadership – either planned or unplanned – to ensure the stability and accountability of the organization until new leadership and management is identified. In addition, well-managed organizations assess the leadership needs of the organization to help ensure the selection of qualified and capable leaders and managers who are representative of the community, a good fit for the organization's mission, vision, values, goals and objectives, and who have the necessary competencies and skills to manage and lead the organization. Accordingly, OST will look carefully at its leadership cadre and also identify potential future leaders, as discussed above, and will take steps to build a pipeline of future OST leaders.



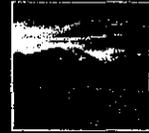
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## **PERFORMANCE PLANS SUPPORTING HUMAN CAPITAL MANAGEMENT**

A critical factor to the success of this workforce plan is the support of all employees throughout OST. OST's senior management is making human capital a major priority and communicating its importance to managers and supervisors on a continuing basis. This communication is in part done orally and through policies and directives, but most importantly through senior leadership's actions. The accomplishment of human capital and other mission related goals will be clearly established in organizational and employee performance plans. Supervisory and managerial achievement or failure to achieve human capital performance goals will be addressed in the same manner as other mission-related performance goals.

Possible organizational human capital metrics are provided in Step V: Monitoring, Evaluating, and Revising the Plan. OST will be determining which are the most important for its human capital management and will be setting up a process by which to measure success.

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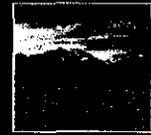
## Step IV – Implementation: Institutionalizing Workforce Planning Continual Improvement Efforts

This section describes steps OST will take to institutionalize strategic workforce planning and human capital management into its basic business operations to ensure continual improvement. OST exists out of the recognized need for ongoing and continual improvement of the management of trust activities. Continual improvement and reform are at the core of the agency's mission and required of business processes. Accordingly, similar continuous improvement initiatives should be undertaken and ongoing with the agency's human capital to ensure its continued effectiveness and viability.

While the processes and procedures for managing trust activities are far different today than they were in past years, so, too, are the skills and competencies required to conduct these activities. It is likely that, in the future, skills and competencies will also differ from today and, thus; it is imperative to continually review agency staffing needs and workforce deployments to ensure that they keep pace with change.

There are a number of ways to ensure that workforce planning activities do not occur in a vacuum and are not a one-time exercise. Below are options OST is studying for application to its planning processes, ensuring that workforce planning is integrated with its business processes:

- Develop process to identify organizational trends and conduct annual refresh of workforce data to identify new or emerging trends;
- Link all hiring, promotions, etc. to workforce plans;
- Review and/or update the skills models for mission critical occupations with direct linkages to recruitment, retention, and employee development;
- Identify and track key types of information that impact allocation of resources;
- Design and develop a workforce information delivery system;
- Explore reporting tools and options for access to recurring and multiple workforce data sources to track agency needs and results;
- Leverage hiring, selection and training processes, tools and flexibilities for better recruitment and retention;
- Hold periodic reviews/management work sessions to identify core human capital issues needing attention;

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- Include measures in managers' and supervisors' performance plans to institute accountability for workforce issues;
- Institute clear policies for dealing with poor performers; and,
- Establish a schedule whereby individual functional areas, mission critical positions, or competency clusters are reviewed for gaps.

OST will use a biannual meeting with the Principal Deputy Special Trustee to ensure that senior managers and supervisors are aware of their responsibilities for workforce planning and that it is critical to their individual and organizational success. OST will review all supervisory/managerial performance plans to ensure that human capital responsibilities are incorporated where appropriate. OST will make all supervisors aware of the possible metrics of performance for human capital tasks and that they should expect tasks performed within similar timeframes. The Principal Deputy Special Trustee will communicate with all OST employees periodically regarding the workforce plan and solicit their feedback/suggestions on recent human capital initiatives.

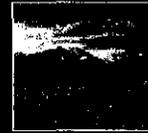
## **INFRASTRUCTURE REQUIRED TO MEET PLAN GOALS**

### **Access to Data**

As previously noted, OST has an agreement with Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) to provide most of OST's required human resource services. That relationship will continue. However, it is critical to OST mission success that agency leadership has the necessary information to monitor progress on the goals of the workforce plan and make any required revisions. Therefore, the Office of Budget, Finance, and Administration should make the necessary assignments within its staff to ensure appropriate and accurate workforce data/reports are available.

### **Management Accountability**

In order for the workforce plan to be effective OST plans to ensure that all managers and supervisors are aware of their responsibilities regarding workplace initiatives designed to maintain a work environment that stimulates and empowers staff such that attrition remains at a low level and quality staff are retained. Workforce planning goals and progress will become a critical part of the agenda of senior management meetings.

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In addition, the Principal Deputy Special Trustee will hold biannual meetings with senior staff specifically to discuss the status of the workforce which covering, at minimum, the following topic areas:

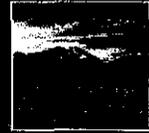
- revisions in mission objectives or priorities,
- actual vs projected attrition levels,
- actual vs projected hiring,
- review scheduled training initiatives,
- identification of other training/development efforts needed in the future.

A staff member will serve as recording secretary for these sessions and prepare a memorandum outlining all decisions reached at these meetings. These memoranda of decisions will serve as a basis for annual workforce plan updates and to ensure that the workforce plan is a dynamic management tool that remains current as opposed to a product that becomes obsolete as time passes.

## **COMMUNICATING THE MESSAGE TO ENSURE RESULTS**

A major component of OST's workforce plan is communication. From the beginning of the workforce planning process with setting the strategic direction of the agency until the evaluation of the strategies employed to address workforce issues, communication and involvement of management and employees is essential for success. OST has used traditional management meetings with staff to discuss strategic priorities. The majority of OST staff has a personal as well as professional commitment to achieving the agency mission. In addition OST has produced several publications that are available to staff and stakeholders that clearly identify OST mission and functions. Examples of such a publication are the 2006 OST Report to Congress and the DOI Strategic Plan 2008 Report to Congress

Documents such as the Report to Congress can be used to keep OST staff at all levels informed and involved. OST will discuss the workforce plan and progress with staff throughout the year. Supervisors and managers have clear responsibilities in the areas of workforce planning. Involvement of all employees is necessary to make a successful workforce plan. Employees need to understand their offices' responsibilities and personnel and workload distributions and how both relate to accomplishing the agency mission. All can provide management with feedback regarding the status of the workforce and specific human capital initiatives. Employee feedback can be the difference between a highly successful effort and failure.

**OST WORKFORCE AND DIVERSITY PLAN  
July 2011****Step V – Monitoring, Evaluating, and Revising the Plan****METRICS FOR SUCCESS - HUMAN CAPITAL TASK MEASURES**

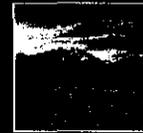
Metrics are measurements that provide a basis for comparison. Strategic human capital management requires a reliable and valid set of metrics that provides an accurate baseline against which OST progress can be assessed. Below is a list of possible metrics OST will consider utilizing to evaluate progress toward achievement of specific human capital goals.

**HR Flexibilities**

- 1) Number of employees enrolled in flextime programs.
- 2) Number of employees receiving transit subsidies.
- 3) Number of annual leave forfeiture restoration requests made/approved.
- 4) Average employee sick leave usage.
- 5) Average number of overtime hours worked by major occupation.
- 6) Number of employees enrolled in telework/flexiplace program (when internet access is restored).

**Staffing/Diversity**

- 1) Average processing cost of recruit actions.
- 2) Average processing cost of competitive promotion actions.
- 3) Number of veterans preference eligible applicants considered/selected.
- 4) Number of disabled eligible applicants considered/selected.
- 5) Number of female applicants considered/selected.
- 6) Number of Indian Preference eligible applicants considered/selected.



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- 7) Number of minority applicants considered/selected.
- 8) Number of disabled promotion candidates considered/selected.
- 9) Number of female promotion candidates considered/selected.
- 10) Number of minority promotion candidates considered/selected.
- 11) Number of recruitment bonuses offered/accepted.
- 12) Number of retention allowances offered/accepted.
- 13) Number of relocation bonuses offered/accepted.
- 14) Number of employees resigning or transferring.
- 15) Number of exit interviews completed.
- 16) Number of recruitment visits to colleges or universities.
- 17) Number of recruitment visits to military out-processing centers.
- 18) Number of job fairs attended.

**Performance Management**

- 1) Number of delinquent annual performance reviews.
- 2) Number of delinquent progress reviews.
- 3) Number of incentive awards recommended/approved.
- 4) Number of employees without individual annual performance plans.
- 5) Number of work units without documented performance goals and standards.
- 6) Number of supervisors' and managers' appraisal criteria that do not include performance management.
- 7) Number of supervisors' and managers' appraisal criteria that do not include implementation of change initiatives.

**Training/Employee Development**

- 1) Number of new supervisors/number receiving timely mandatory training.
- 2) Number of employees getting competency-based training from Federal sources.
- 3) Number of employees getting competency-based training from non-Federal sources.



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- 4) Number of supervisors/leaders completing courses on performance management and coaching techniques.
- 5) Number of employees without individual development plans.

**Discipline, Appeals and Grievances**

- 1) Number of probationers/number of probationers removed.
- 2) Number of performance-based actions proposed/taken/decided by the Merit Systems Protection Board (MSPB).
- 3) Number of adverse (Part 752) actions proposed/taken/ decided by MSPB.
- 4) Number of discrimination-based complaints resolved informally/resolved formally/decided in the Equal Employment Opportunity (EEO) process.
- 5) Number of grievances resolved at first or second level/resolved internally/resolved by arbitrator/decided by Federal Labor Relations Authority (FLRA).
- 6) Number of Fair Labor Standards Act (FLSA) complaints resolved internally/resolved according to labor agreement/decided by OPM.
- 7) Number of "whistleblower" complaints resolved internally/decided by Office of Special Counsel (OSC).

## **Appendix A - HR Flexibilities**

**Retention Allowance** - payment of a percentage of an existing employee's salary to retain him/her in OST when the potential loss of those competencies and skills would be detrimental to OST (this may assist OST in keeping an employee who is critical to the successful transformation of the agency and who indicates a plan to retire in the near future);

**Relocation Bonus** - payment of a percentage of an existing employee's salary to relocate that person to another geographic location when it is in the best interests of OST (this would be particularly useful when seeking to relocate staff to another field location);

**Recruitment Bonus** - payment of a percentage of the new employee's salary to recruit him/her for a critical job in the new organization (this may be useful to fill critical vacancies resulting from retirements or realignment of functions);

**Employee Referral Bonus** - referral by OST employees of candidates for OST positions resulting in successful employment and cash awards to referring OST employees (this could be applied to those vacancies deemed the most critical by the agency);

**Relocation Expenses and Services** - payment of travel and transportation expenses, as well as optional real estate services, to relocate new or current OST employees (as with the case of a relocation bonus, this may be applied to the relocation of staff to new field locations or from headquarters to the field and vice versa);

**Use of Innovative Hiring Programs** - for example, employment of students under a formal work-study program or cooperative education program; continuation of the career intern program for recent college graduates; and, use of student volunteers who seek internships in return for college credit (these authorities would provide OST with a pipeline or contingent workforce to meet agency competency and skill gaps);

**Repayment of Student Loans** - applicable to any employee who is still repaying college student loans (continuation of the use of this authority by OST should be linked to its hiring programs and use of recruitment bonuses);

**Tuition Assistance** - payment of tuition costs for OST employees for college courses that support successful work performance (this may be helpful for employees with expanded or changed roles in areas such as information technology, project/program management, etc.)

**Use of Incentive Awards** - monetary and non-monetary awards for achieving and supporting the successful organizational and program changes (one such award is gainsharing/goalsharing that could be directly tied to accomplishment of agency program, operational, and funding goals); and,

**Liability Insurance** - reimbursement of up to ½ of the cost of professional liability insurance for agency managers (this authority would support holding managers accountable for dealing with performance issues).

## Appendix B – OST Workforce Analysis Data, Tables, and Charts

This appendix provides detailed tables, charts, and graphs upon which the workforce analysis of OST was conducted.

Unless otherwise noted, all years are fiscal years and all fiscal year data represents the workforce as it stood on September 30 (the final day) of the fiscal year.

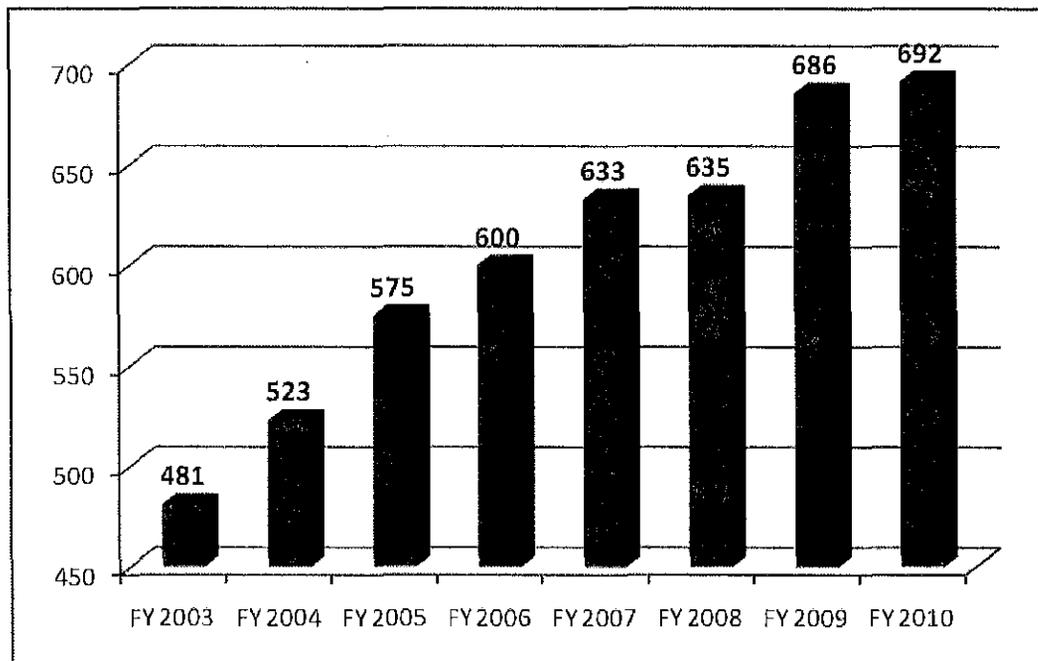
All headcounts are on-board (full time and part time) and not full time equivalents (FTEs).

“Current” data is as of the end of FY 2010 (September 30, 2010).

Data for years prior to FY 2007 is extracted from OST’s draft 2007 Workforce Plan and Diversity Report, which included an exhaustive workforce analysis. Data for years FY 2007 through 2010 are from the Department of Interior’s HR Information and payroll system.

In some cases, this data was supplemented by data from the Office of Personnel Management’s “FEDSCOPE” online data warehouse. Data from this data system is noted where used.

**Figure 1. OST Headcount**



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OST has increased in size by 44% since FY 2003. At the end of FY 2010, the agency stood at 692 employees, up from 481 in FY 2003.

**Figure 2. OST Headcount - HQ and Field**

HQ	2007	2008	2009	2010
FIELD	617	601	644	657
HEADQUARTERS	16	34	42	35
Total	633	635	686	692

At the end of FY 2010, 95% of OST's workforce worked in field offices across the United States. While the Headquarters component of OST has doubled since FY 2007, it still represents only 5.1% of the entire workforce.

**Figure 3. OST Employees by Grade 2010**

PP	WG	GS	GS	GS	GS	GS	GS	GS	GS	GS	GS	GS	GS	ES
GR	5	15	14	13	12	11	09	08	07	06	05	04	03	0
No.	1	35	107	96	47	22	35	16	161	39	80	40	1	12
%	0.1%	5.1%	15.5%	13.9%	6.8%	3.2%	5.1%	2.3%	23.3%	5.6%	11.6%	5.8%	0.1%	1.7%

**Figure 4. Grade Distribution 2010**

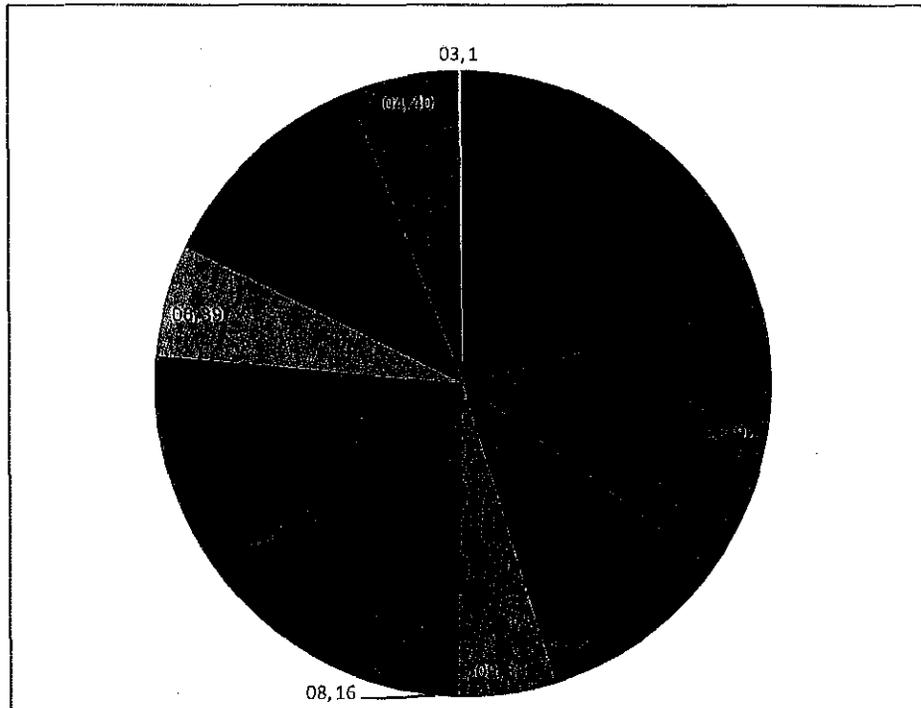


Figure 5. **OST Grades - HQ and Field**

GRADE	FIELD	HQ	TOTAL
EXEC			
	11	1	12
GS			
15	25	10	35
14	98	9	107
13	93	3	96
12	44	3	47
11	19	3	22
09	35		35
08	15	1	16
07	159	2	161
06	38	1	39
05	78	2	80
04	40		40
03	1		1
WAGE			
5	1		1
TOTAL			
	657	35	692

Figure 6. **OST Employees by Series and Occupation**

SERIES	POSITION	EMPLOYEES
80	PERSONNEL SECURITY SPECIALIST	2
301	BUSINESS MANAGER	1
301	DEPUTY DIRECTOR - OHTA	1
301	DIRECTOR, OFF OF BUDGET, FIN & ADMIN	1
301	EXECUTIVE ASSISTANT	1
301	EXTERNAL AFFAIRS OFFICER	1
301	IIM PROGRAM DIVISION CHIEF	1
301	PROBATE SPECIALIST	4
301	PROGRAM SPECIALIST	6
301	RECORDS MANAGEMENT SPECIALIST	31
301	SAFETY AND SECURITY OFFICER	1
301	STAFF ASSISTANT	2
301	TRIBAL TRUST ACCOUNTING	1

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301	TRUST REFORM OFFICER	1
301	TRUST REFORM SPECIALIST	7
303	ADMINISTRATIVE SUPPORT ASSISTANT	2
303	CLERK	1
303	DOCUMENT CONTROL TECHNICIAN	2
303	PROGRAM SUPPORT ASSISTANT	8
303	QUALITY CONTROL TECHNICIAN	8
303	SECRETARIAL ASSISTANT	1
305	MAIL CLERK	1
318	SECRETARY	22
326	OFFICE AUTOMATION ASSISTANT	19
326	OFFICE AUTOMATION CLERK	5
340	DEPUTY SPECIAL TRUSTEE - FIELD OPERATIONS	1
340	DEPUTY SPECIAL TRUSTEE - PRINCIPAL	1
340	DEPUTY SPECIAL TRUSTEE - TRUST ACCOUNTABILITY	1
340	DEPUTY TRUST ADMINISTRATOR	3
340	DIRECTOR, OFFICE TRUST REVIEW & AUDIT	1
340	DIRECTOR, OTR	1
340	PROGRAM MANAGER	1
340	REGIONAL FIDUCIARY TRUST ADMINISTRATOR	5
341	ADMINISTRATIVE OFFICER	3
343	MANAGEMENT AND PROGRAM ANALYST	61
356	DATA TRANSCRIBER	23
501	ACCOUNTING ANALYST	1
501	FINANCIAL ANALYST	1
501	FINANCIAL DOCUMENT CONTROL SPECIALIST	1
501	FINANCIAL SPECIALIST	1
501	FINANCIAL TRUST OPERATIONS	2
501	TRUST ACCOUNTS MANAGER	6
501	TRUST ACCOUNTS SPECIALIST	9
503	ACCOUNTS MAINTENANCE CLERK	2
503	ACCOUNTS MAINTENANCE TECHNICIAN	37
503	FINANCIAL CONTROL DESK TECHNICIAN	5
503	TRUST FUNDS DISBURSEMENT TECHNICIAN	4
503	TRUST OPERATIONS TECHNICIAN	6
510	ACCOUNTANT	42
511	AUDITOR	9
525	ACCOUNTING TECHNICIAN	172
525	ACCOUNTS MAINTENANCE CLERK	1
560	BUDGET ANALYST	4

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560	BUDGET OFFICER	1
1035	PUBLIC AFFAIRS SPECIALIST	1
1101	APPRAISAL PROGRAM SPECIALIST	12
1101	FIDUCIARY TRUST OFFICER	47
1101	PROPERTY MANAGEMENT SPECIALIST	1
1101	TRIBAL ACCOUNTS MANAGER	1
1160	FINANCIAL ANALYST	5
1171	APPRAISER	42
1421	ARCHIVES TECHNICIAN	15
2005	SUPPLY TECHNICIAN	1
2210	CHIEF INFORMATION OFFICER	1
2210	INFORMATION TECHNOLOGY PROGRAM MANAGER	1
2210	INFORMATION TECHNOLOGY PROJECT MANAGER	1
2210	INFORMATION TECHNOLOGY SPECIALIST	28
6907	MATERIALS HANDLER	1

**Figure 7. OST Salary Costs**

Total Salary						
2007 Salary	2008 Salary	2009 Salary	2010 Salary	2011 Salary EST	2012 Salary EST	2013 Salary EST
\$39,776,220	41,000,000	58,000,000	50,000,000	51,000,000	51,000,000	50,000,000

**Figure 8. OST by Gender**

FY 2010	Count
Male	217
Female	475

Females are 68.6% of the OST workforce. This is compared to males which are 31.3%.

Figure 9. **Females as a Percentage of Total OST Workforce HQ and Field**

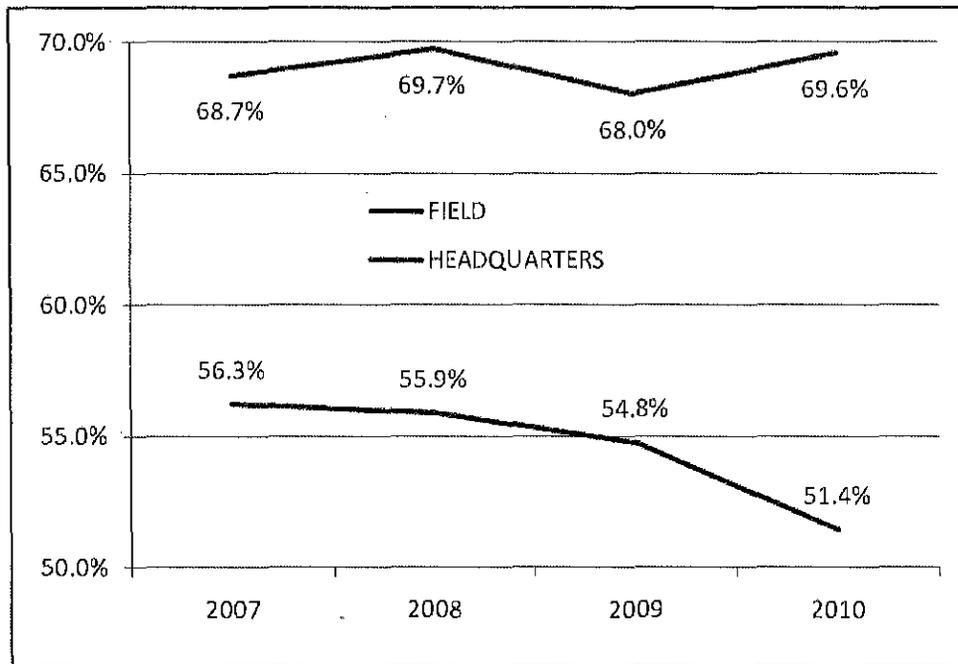


Figure 10. **Females by Grade FY 2010**

GRADE	NO. FEMALES	% OF ALL IN GRADE
<b>EXEC</b>		
0	4	33.3%
<b>GS</b>		
03	1	100.0%
04	27	67.5%
05	71	88.8%
06	29	74.4%
07	139	86.3%
08	13	81.3%
09	28	80.0%
11	16	72.7%
12	32	68.1%
13	55	57.3%
14	44	41.1%
15	16	45.7%

**Figure 11. Occupational Series by Gender FY 2010**

SERIES	NO. FEMALES	TOTAL IN SERIES	% OF ALL IN SERIES
80	1	2	50.0%
301	37	59	62.7%
303	20	22	90.9%
305		1	0.0%
318	21	22	95.5%
326	22	24	91.7%
340	7	14	50.0%
341	2	3	66.7%
343	34	61	55.7%
356	15	23	65.2%
501	20	21	95.2%
503	42	54	77.8%
510	30	42	71.4%
511	6	9	66.7%
525	151	173	87.3%
560	5	5	100.0%
1035	1	1	100.0%
1101	30	61	49.2%
1160		5	0.0%
1171	13	42	31.0%
1421	8	15	53.3%
2005		1	0.0%
2210	10	31	32.3%
6907		1	0.0%

**Figure 12. OST Race and National Origin**

Race	EMPLOYEES	% of All
AMERICAN INDIAN or ALASKA NATIVE	530	76.6%
ASIAN	4	<1%
BLACK or AFRICAN AMERICAN	16	2.3%
HISPANIC OR LATINO	4	<1%
WHITE	113	16.3%
OTHER	25	3.6%

Figure 13. **RNO by Grade**

GRADE	AMERICAN INDIAN or ALASKA NATIVE	ASIAN	BLACK or AFRICAN AMERICAN	HISPANIC or LATINO	WHITE	OTHER
<b>ES</b>						
0	7			1	3	1
<b>GS</b>						
15	16	1		1	16	1
14	68		2	1	31	5
13	61		2		27	6
12	33	1	2		11	0
11	14		3		5	0
09	33				1	1
08	14		1	1		0
07	149	1	1		5	5
06	35		2		1	1
05	73				3	4
04	25	1	3		10	1
03	1					0
<b>WG</b>						
5	1					0
<b>Total</b>	530	4	16	4	113	25

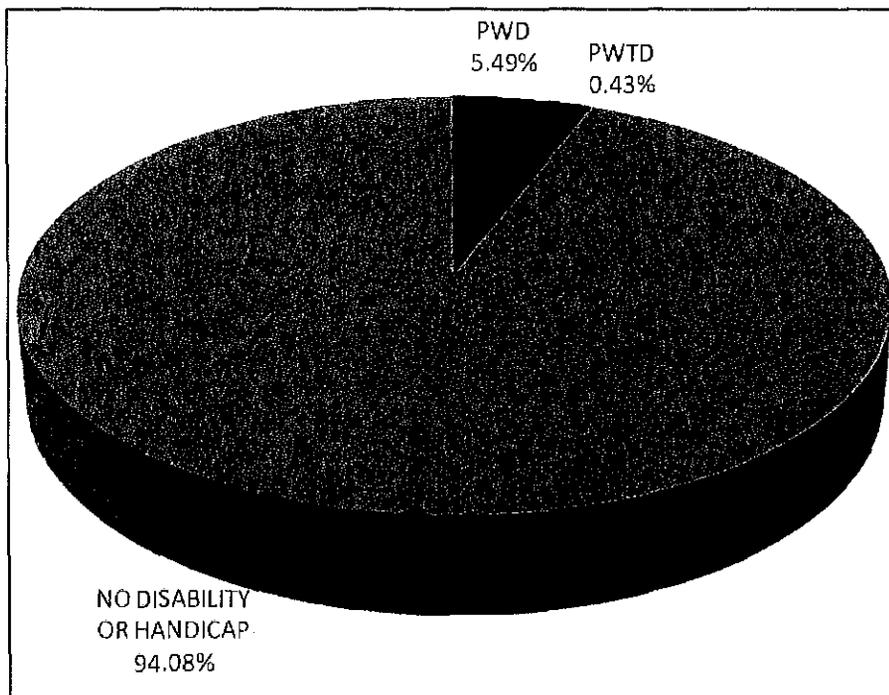
Figure 14. **Percentage of RNO within Grade**

GR	AMERICAN INDIAN or ALASKA NATIVE	ASIAN	BLACK or AFRICAN-AMERICAN	HISPANIC or LATINO	WHITE	OTHER
<b>EXEC</b>						
0	58.3%	0.0%	0.0%	8.3%	25.0%	8.3%
<b>GS</b>						
15	45.7%	2.9%	0.0%	2.9%	45.7%	2.9%
14	63.6%	0.0%	1.9%	0.9%	29.0%	4.7%
13	63.5%	0.0%	2.1%	0.0%	28.1%	6.3%
12	70.2%	2.1%	4.3%	0.0%	23.4%	0.0%
11	63.6%	0.0%	13.6%	0.0%	22.7%	0.0%
09	94.3%	0.0%	0.0%	0.0%	2.9%	2.9%
08	87.5%	0.0%	6.3%	6.3%	0.0%	0.0%
07	92.5%	0.6%	0.6%	0.0%	3.1%	3.1%
06	89.7%	0.0%	5.1%	0.0%	2.6%	2.6%
05	91.3%	0.0%	0.0%	0.0%	3.8%	5.0%
04	62.5%	2.5%	7.5%	0.0%	25.0%	2.5%
03	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>WG</b>						
5	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%

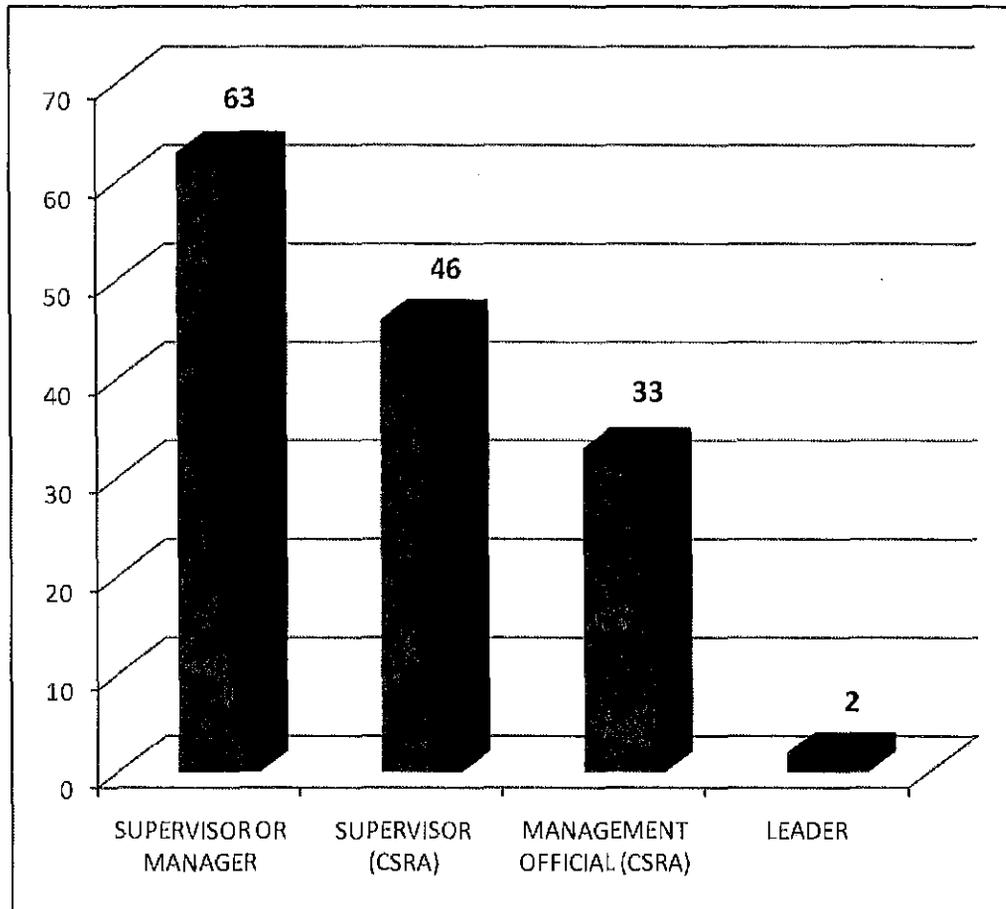
Figure 15. **Preference Eligible Veterans in the Workforce**

PREFERENCE	Total	% of Total Workforce
5 POINT	37	5.3%
10 POINT <10%	4	0.6%
10 POINT <30%	8	1.2%
10 POINT OVER 30%	9	1.3%
10 POINT OTHER	1	0.1%
NONE	633	91.5%
TOTAL PERCENT W PREFERENCE		8.5%

**Figure 16. Persons with Disabilities and Persons with Targeted Disabilities**



**Figure 17. OST Leadership**



Of the 144 leadership positions in OST, 137 are located in the field and 7 are in Wahington, DC Headquarters.

For purposes of this plan, leadership refers to all supervisory, management, and executive positions in OST.

**Figure 18. Leadership Positions by Gender**

	FEMALES	TOTAL	% Female
LEADER	1	2	50.0%
MANAGEMENT OFFICIAL (CSRA)	18	33	54.5%
SUPERVISOR (CSRA)	18	46	39.1%
SUPERVISOR OR MANAGER	31	63	49.2%
Total	68	144	47.2%

While females are 68.6% of the OST workforce, they are only 47.2% of all leadership positions in OST.

**Figure 19. Leadership Positions in OST**

SERIES	POSITION	Count
301	DEPUTY DIRECTOR - OHTA	1
301	DIRECTOR, OFF OF BUDGET, FIN & ADMIN	1
301	EXECUTIVE ASSISTANT	1
301	EXTERNAL AFFAIRS OFFICER	1
301	IIM PROGRAM DIVISION CHIEF	1
301	PROBATE SPECIALIST	1
301	PROGRAM SPECIALIST	2
301	RECORDS MANAGEMENT SPECIALIST	5
301	TRIBAL TRUST ACCOUNTING	1
301	TRUST REFORM OFFICER	1
301	TRUST REFORM SPECIALIST	6
340	DEPUTY SPECIAL TRUSTEE - FIELD OPERATIONS	1
340	DEPUTY SPECIAL TRUSTEE - PRINCIPAL	1
340	DEPUTY SPECIAL TRUSTEE - TRUST ACCOUNTABILITY	1
340	DEPUTY TRUST ADMINISTRATOR	3
340	DIRECTOR, OFFICE TRUST REVIEW & AUDIT	1
340	DIRECTOR, OTR	1
340	PROGRAM MANAGER	1
340	REGIONAL FIDUCIARY TRUST ADMINISTRATOR	5
341	ADMINISTRATIVE OFFICER	1
343	MANAGEMENT AND PROGRAM ANALYST	16
501	FINANCIAL DOCUMENT CONTROL SPECIALIST	1
501	FINANCIAL SPECIALIST	1
501	FINANCIAL TRUST OPERATIONS	1
501	TRUST ACCOUNTS MANAGER	6
503	TRUST FUNDS DISBURSEMENT TECHNICIAN	1
510	ACCOUNTANT	10
511	AUDITOR	2
560	BUDGET OFFICER	1
1101	FIDUCIARY TRUST OFFICER	47
1101	TRIBAL ACCOUNTS MANAGER	1
1160	FINANCIAL ANALYST	2
1171	APPRAISER	15
2210	CHIEF INFORMATION OFFICER	1
2210	INFORMATION TECHNOLOGY PROJECT MANAGER	1
2210	INFORMATION TECHNOLOGY SPECIALIST	2

Trends

**Figure 20. Separations/Losses by Type and Fiscal Year**

	2003	2004	2005	2006	2007	2008	2009	2010	Total
<b>Retirements</b>									
Disability	4	1	2	0	1	1		1	10
In Lieu of Involuntary Action (ILIA)	1	0	1	2		3	2		9
Voluntary	6	8	10	14	17	10	8	15	88
<b>Resignations</b>									
Resignations	22	38	33	32	19	24	20	22	210
ILIA			2				1		3
<b>Removals</b>									
Terminations (Includes During Probationary Period)	2	2	1	5	2	5	4	9	30
Removals		2	3	3	2	2			12
Expiration of Appointment	17	12	10	2	1	12	6	7	67
<b>Other</b>									
Deaths		2	1	3	2		3		11
Transfers	8	3	13	6	4	12	13	20	79
<b>TOTAL</b>	<b>60</b>	<b>68</b>	<b>76</b>	<b>67</b>	<b>48</b>	<b>69</b>	<b>57</b>	<b>74</b>	<b>519</b>

The table above depicts separations by all types in each of the last eight fiscal years. Elsewhere in this analysis, closer analysis of key separation indicators (retirement trends, resignations, attrition, etc.) is provided and discussed in greater detail.

***Losses versus Attrition***

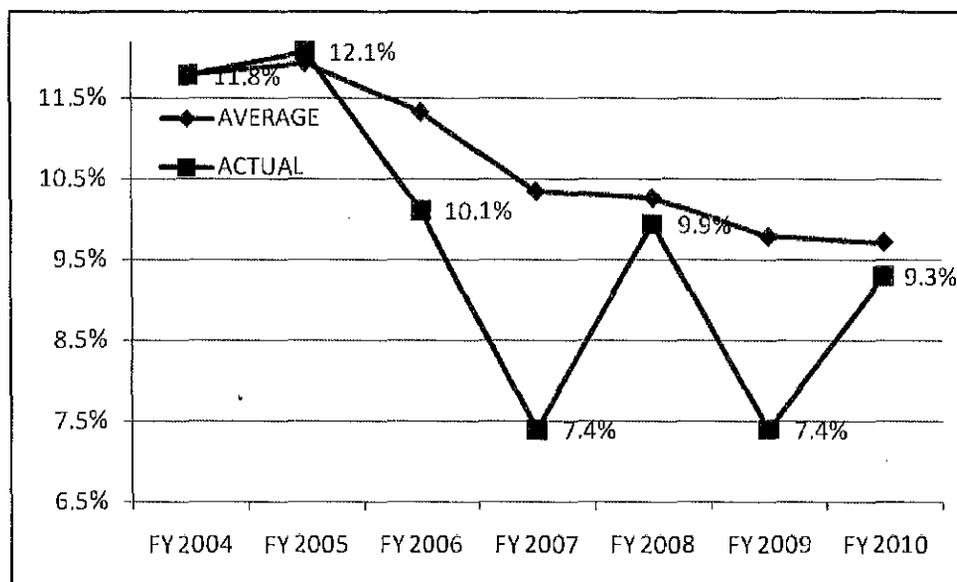
*Losses include all forms of separation from the Agency (including Agency-initiated actions such as terminations during employee probationary periods, expiration of time-limited appointments, etc). The loss rate is calculated by starting with the total number of employees (all employees, including time*

limited, intermittent, seasonal, etc.) on board at the beginning of each FY, adding all accessions during the FY, and then comparing losses during the FY against all employees on board at any point during the FY.

Attrition is different from losses in that attrition is focused on losses initiated by employees for which the agency has little or no control. For example, while an agency can control a loss which results from the agency's choice to use a time-limited appointment, it cannot control when an employee opts to retire or decides to transfer to another agency. When Agency-initiated separations are removed (removals, terminations, expirations of appointments, etc.) and only employee-initiated losses are considered, attrition is calculated by adding all hires in an FY to the number of employees on board at the end of the prior FY and then calculating the percentage of those employees who voluntarily separated during that FY.

**Figure 21. OST Loss Rates**

FY	On Board End of FY	Accessions	All On Boards During FY	Losses in FY	Loss Rate
2003	481				
2004	523	96	577	68	11.8%
2005	575	106	629	76	12.1%
2006	600	88	663	67	10.1%
2007	633	49	649	48	7.4%
2008	635	61	694	69	9.9%
2009	686	95	730	54	7.4%
2010	692	88	774	72	9.3%



Average annual losses in OST have steadily declined over the last six FYs. However, year to year, over the last four FYs they have vacillated, likely due to strained economic conditions in the United States over that period.

Losses were 9.3% in FY 2010, though most a large number of those occurred in a single location, Lenexa.

**Figure 22. OST Attrition Rates**

FY	On Board End of FY	Accessions	All On Boards During FY	Attrition in FY	Attrition Rate
2003	481				
2004	523	96	577	52	9.0%
2005	575	106	629	62	9.9%
2006	600	88	663	57	8.6%
2007	633	49	649	43	6.6%
2008	635	61	694	50	7.2%
2009	686	178	730	47	6.4%
2010	692	176	774	58	7.5%

Similar to the loss rate, OST's attrition rate (non-agency initiated actions) has dropped (as an overall average) to approximately 7.8%. Following consecutive annual declines FYs 2005, 2006, and 2007, attrition rose .6% in FY 2008, dipped to its lowest level in seven years in FY 2009, and rose .9% in FY 2010.

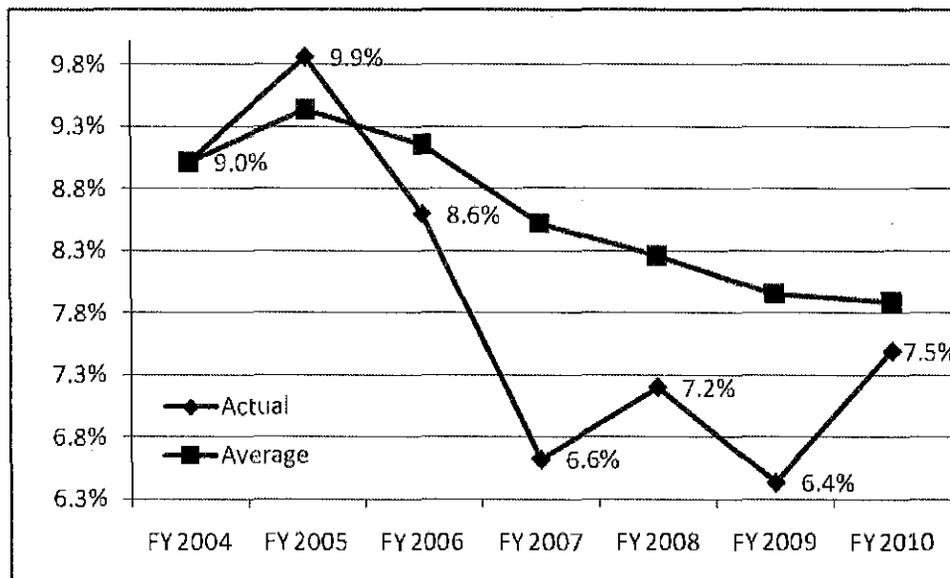


Figure 23. Separations by Grade FYs 2003 through 2010

Grade	RETIREMENT - DISABILITY	RETIREMENT - ILIA	RETIREMENT - VOLUNTARY	RESIGNATION	RESIGNATION - ILIA	TERMINATION **	REMOVAL	TERMINATION - EXPIRATION OF APPOINTMENT	DEATH	TERMINATION - APPOINTMENT IN OTHER AGENCY	TOTAL	% of ALL SEPARATIONS
ES-00			3	1							4	0.8%
ES-02		1		4		2		16			23	4.5%
GS-15			7	5						3	15	2.9%
GS-14		1	14	9					1	7	32	6.2%
GS-13	1	1	24	13		1	1	1		11	53	10.3%
GS-12	2	4	5	14		3	2		2	12	44	8.5%
GS-11		1	4	7		1	1			6	20	3.9%
GS-10										1	1	0.2%
GS-09			4	4			2		1	2	13	2.5%
GS-08	1		1	4						4	10	1.9%
GS-07	4		17	22	1	3	1	3	5	10	66	12.8%
GS-06			3	22	2	2	4		1	6	40	7.8%
GS-05	1	1	2	61		4	1	5		7	82	15.9%
GS-04	1		1	40		14		36	1	8	101	19.6%
GS-03				3				6			9	1.7%
WG-05				1							1	0.2%
UNK										2	2	0.4%
Totals	10	9	85	210	3	30	12	67	11	79	516	
	1.9%	1.7%	16.5%	40.7%	0.6%	5.8%	2.3%	13.0%	2.1%	15.3%		

\*\* Includes removal during probationary period

Figure 24. Separations/Losses of all Types by Series, Last Four FYs (2007 - 2010)

Series	2007	2008	2009	2010	Total	% all Seps
0525	14	9	12	14	49	19.8%
0326	9	16	5	7	37	14.9%
1171	3	8	3	8	22	8.9%

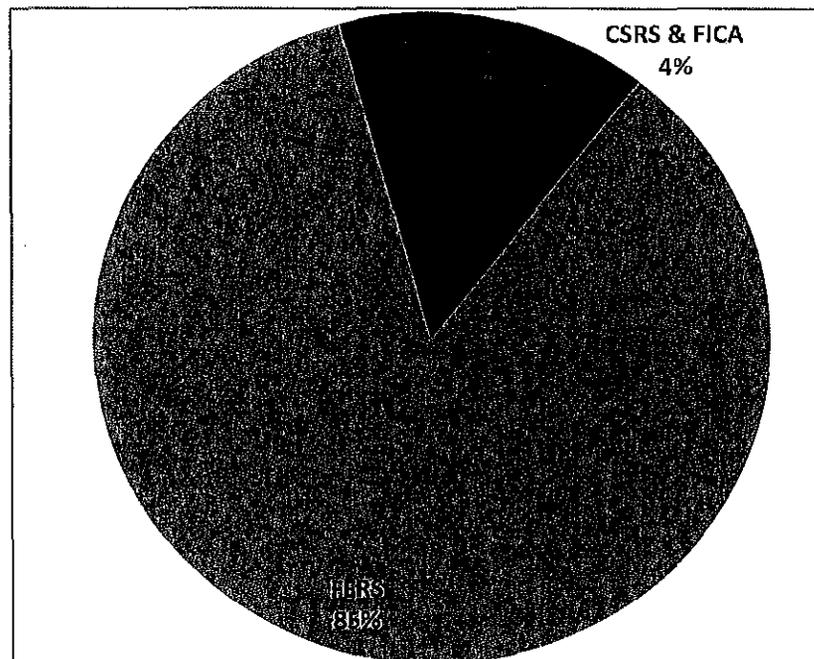
1421	3	12	1	3	19	7.7%
0343	4	4	5	6	19	7.7%
0356				16	16	6.5%
0318	2	4	7	1	14	5.6%
1.101	5	1	4	4	14	5.6%
0503	2		4	6	12	4.8%
0301	1	2	2	5	10	4.0%
2210	2	4	2	2	10	4.0%
0510		4	4	1	9	3.6%
0501	2		1	1	4	1.6%
0303		1	2		3	1.2%
0511		1	2		3	1.2%
0560		1	1		2	0.8%
0340	1		1		2	0.8%
0344		1			1	0.4%
6907		1			1	0.4%
Unk			1		1	0.4%
Total	48	69	57	74	248	

**Figure 25. Separations of Veterans Preference Eligibles FYs 2003 through 2010**

Type of Separation	Total
DEATH	5
RESIGNATION	19
RETIREMENT - VOLUNTARY	25
RETIREMENT-DISABILITY	3
RETIREMENT-ILIA	3
REMOVAL	1
EXPIRATION OF APPOINTMENT	4
TRANSFER	20
TERMINATION - PROBATIONARY/TRIAL PERIOD	2
Total	82

Analysis of OST Future Retirements

**Figure 26. OST Employees by Retirement Plan**



Retirement Plan	Employees
CSRS	45
CSRS & FICA	28
FERS	589
FICA	30

Over 85% of OST's employees are covered by the Federal Employees Retirement System (FERS) and only 10.5% are covered by the Civil Service Retirement System (CSRS).

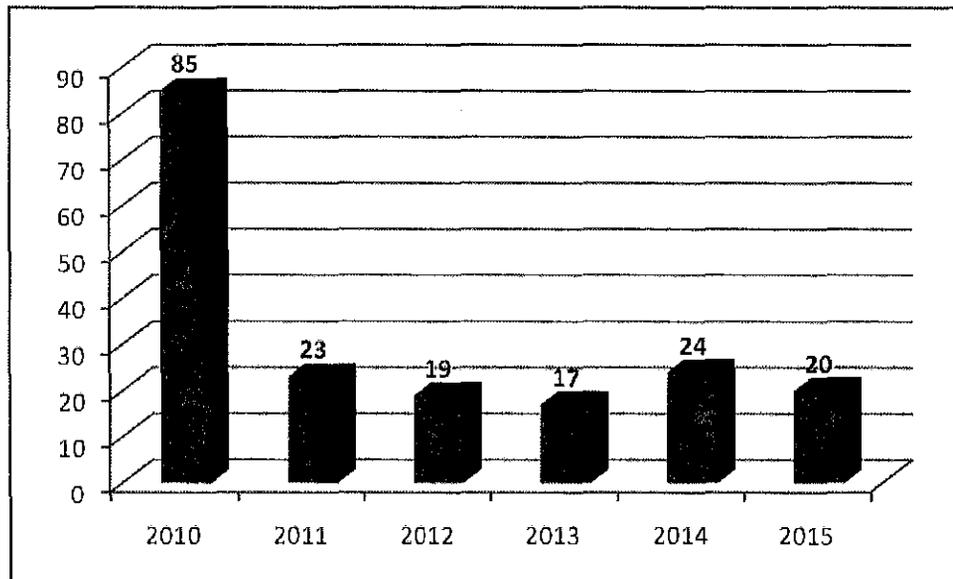
**Figure 27. OST Voluntary Retirements by Year**

FY	2003	2004	2005	2006	2007	2008	2009	2010	Total
Retirements*	10	9	12	14	18	11	8	16	98
Retirement Rate	N/A	1.9%	2.3%	2.4%	3.0%	1.7%	1.3%	2.3%	

\* Includes Voluntary and Disability - Excludes Retirements ILIA

Over the last seven FYs, OST's voluntary retirement rate has averaged 2.1% of the entire workforce (approximately 12 employees per year). The rate was higher in FY 2010, following the lowest year ever, in FY 2009 (during a time of severe economic conditions).

**Figure 28. OST Regular Optional Retirement Eligibility over Next 5 Fiscal Years**



The chart above depicts the number of employees currently eligible for regular optional retirement and the number which are estimated to reach eligibility in each of the next five fiscal years. By 2015, 188, OST employees (27.20% of the 2010 OST workforce) are estimated to reach eligibility for regular optional retirement. Early retirement eligibility (voluntary and discontinued service) is not included in these figures because both forms of early retirement require the agency to take some sort of action to create the entitlement.

Compared to the rest of Government, OST will not have significant numbers/percentages of employees reaching eligibility for retirement in the next five fiscal years. By the end of fiscal year 2010, 85 OST employees (12.3% of the workforce) had the age and service requirements to qualify for regular optional retirement. By comparison, OPM's March 2008 retirement report puts the percentage of all Federal employees eligible at approximately 18% of the non-seasonal full-time permanent workforce. By the end of FY 2014 (the last year forecasted in the report), Governmentwide eligibility increases to 53.2%.

Actual Federal retirement rates have not seen excessive increases, in spite of forecasts that they would. Given OST's average retirement rate of 2.1%, OST could expect to see approximately 15 retirements per year.

**Figure 29. Current Optional Retirement Eligibles By Grade**

PP	GR	Eligible 2010	In Grade	% of Grade Eligible
ES	0	3	12	25.0%
GS	15	11	35	31.4%

GS	14	21	107	19.6%
GS	13	10	96	10.4%
GS	12	3	47	6.4%
GS	11	3	22	13.6%
GS	9	1	35	2.9%
GS	8	2	16	12.5%
GS	7	23	161	14.3%
GS	6	3	39	7.7%
GS	5	4	80	5.0%
GS	4	1	40	2.5%

Of the 85 employees eligible for regular optional retirement as of the end of FY 2010, over half (44 of 85) are in grades GS-13 and above. GS-14 employees account for 24.7% of all eligibles. 31.4% of all GS-15 employees were eligible to retire by the end of FY 2010.

**Figure 30. Optional Retirement Eligibility by 2015 by Occupational Series**

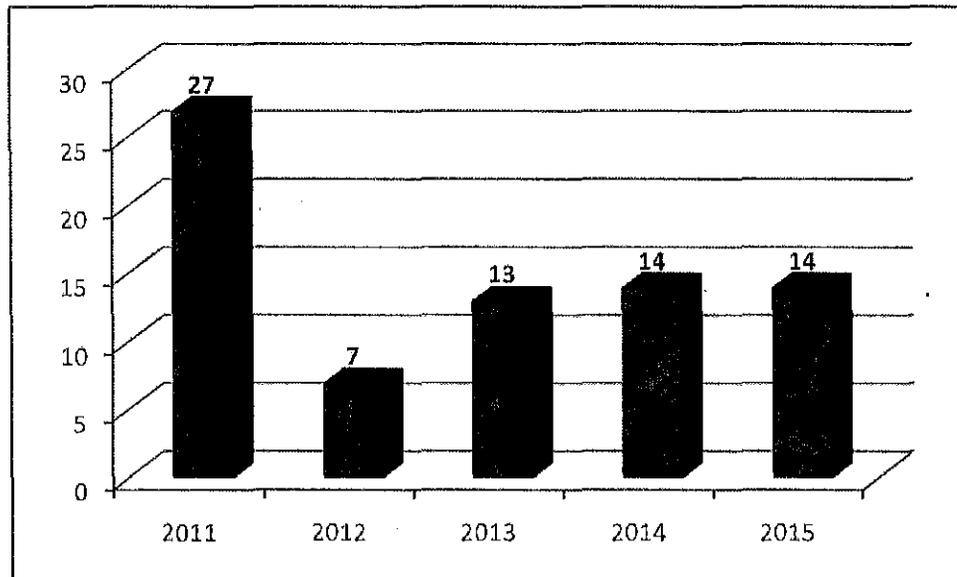
Series	Total in Series	Eligible at End FY 2010	% Eligible at End FY 2010	Total Eligible by End FY 2015	% Eligible End FY 2015
1160	5	1	20.0%	4	80.0%
341	3	2	66.7%	2	66.7%
340	14	2	14.3%	7	50.0%
1101	61	11	18.0%	29	47.5%
301	59	12	20.3%	26	44.1%
511	9	1	11.1%	3	33.3%
1171	42	8	19.0%	14	33.3%
343	61	7	11.5%	18	29.5%
318	22	2	9.1%	6	27.3%
2210	31	5	16.1%	8	25.8%
503	54	5	9.3%	13	24.1%
525	173	23	13.3%	40	23.1%
510	42		0.0%	6	14.3%
303	22	1	4.5%	3	13.6%
501	21	1	4.8%	2	9.5%
356	23	1	4.3%	2	8.7%
326	24	2	8.3%	2	8.3%
1421	15		0.0%	1	6.7%
Series with One Employee	2	1	50.0%	2	100.0%

Total	683	85	12.5%	188	27.5%
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The above table shows current (FY 2010) and future retirement eligibility projections in OST by occupational series. The table, while not projecting actual retirements, is useful for monitoring potential losses by series and year. While by the end of 2015, the percent of employees in the above series reaching minimal eligibility for retirement will more than double from 12.5% at the end of FY 2010 to 27.5% at the end of FY 2015, Governmentwide eligibility increases to 53.2% by 2014 (the most current projection available). OST is one-half of that Governmentwide projection.<sup>8</sup>

**Figure 31. 5 Year At Risk Retirement Projections**

While it is useful to review and monitor trends related to employees reaching the minimum age and service requirement thresholds for retirement eligibility, it is much more valuable to assess which employees are likely to actually exercise their eligibility and retire. While (depending on the retirement plan requirements) employees generally reach eligibility for retirement when they have reached the age of 55 with at least 30 years of Federal service, according to OPM retirement data, the average age and length of service at which employees actually separate for voluntary retirement are 60.4 years of age and 29.3 years of service. Because it has only been recent that large numbers of FERS employees have begun to reach eligibility for retirement, trends specific to FERS are not yet established. However, the available data still provide a useful focal point to help identify employees who are more likely than not to retire, and who pose a greater risk for attrition losses in the agency's workforce.



By the end of FY 2011, OST will have 27 employees who have reached both this age and service threshold. It could be assumed that they are more likely to retire than the remaining employees among the 108 employees who have reached or will reach minimum eligibility requirements as of the end of FY 2011.

<sup>8</sup> U.S. Office of Personnel Management, "An Analysis of Federal Employee Retirement Data: Predicting Future Retirements and Examining Factors Relevant to Retiring from the Federal Service March 2008", March 2008.

By the end of fiscal year 2015, up to 188 OST employees will reach the combination of age and service to reach title to an annuity. 75 of these employees will also reach the threshold at which Federal employees, on average, tend to retire. This is an average of 15 per year, which correlates exactly with OST's average seven FYs (2.1% of the workforce or 15 employees, using OST's current workforce level of 692 employees).

**Figure 32. Retirement At Risk Positions Through FY 2015**

SERIES	OCCUPATIONAL TITLE	LIKELY
525	ACCOUNTING TECHNICIAN	27
301	MULTIPLE	14
343	MANAGEMENT AND PROGRAM ANALYST	7
1101	FIDUCIARY TRUST OFFICER	6
1171	APPRAISER	5
503	ACCOUNTS MAINTENANCE	4
340	MULTIPLE	3
OTHER	Series with fewer than 3 employees likely to retire	9
<b>Total</b>		<b>75</b>

Using the typical age and service for Federal retirements (as opposed to minimum eligibility requirements), the table above shows the occupations "at risk" or most likely to see retirements between now and September 30, 2015. The table projects employees who will reach at least 60.4 years of age and 29.3 years of service during the forecast period. At least 27 of these employees have already reached or will reach this age and service threshold by the end of FY 2011. Of the positions listed above, 19 are leadership employees (supervisors, managers, and executives).

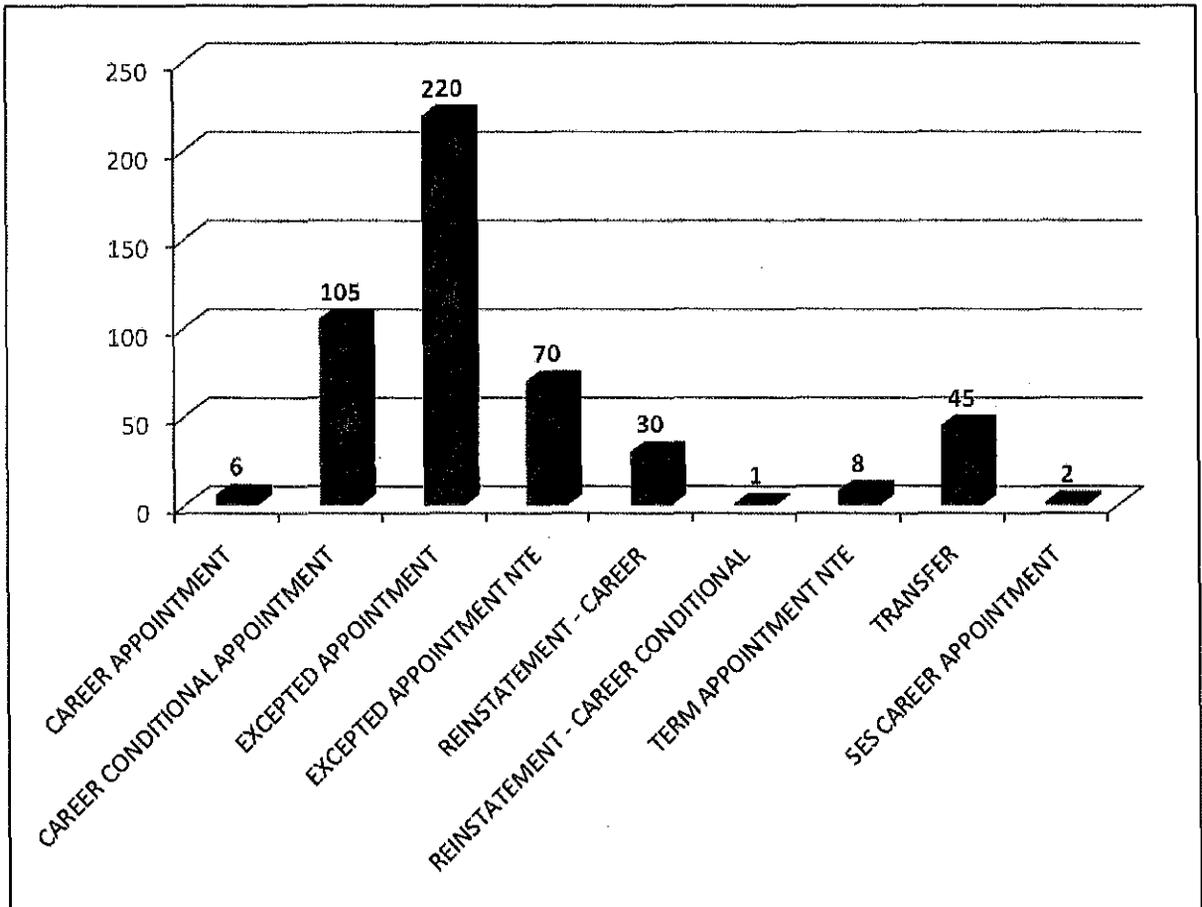
**Figure 33. Leadership At Risk Occupations Through FY 2015**

SERIES	OCCUPATIONAL TITLE	LIKELY
301	MULTIPLE	4
1101	FIDUCIARY TRUST OFFICER	4
340	MULTIPLE	3
343	MANAGEMENT AND PROGRAM ANALYST	3
OTHER	Series with fewer than 3 employees likely to retire	5
<b>Total</b>		<b>19</b>

Using the typical age and service for Federal retirements (at least 60.4 years of age and 29.3 years of service), the table above shows the 19 leadership occupations (supervisors, managers, and executives) "at risk" or most likely to see retirements between now and September 30, 2015. These "at-risk" positions should be monitored as potential losses, and should also be assessed for potential loss of institutional knowledge, competency gaps, and program continuity.

New Hires

**Figure 34. Permanent Accessions in OST 2004 through 2010<sup>9</sup>**



<sup>9</sup> FY 2003 hiring data were not available at the time of this report.

**Figure 35. New Hires by Grade FYs 2004 through 2010**

	GRADE															ALL
	EX	02	03	04	05	06	07	08	09	10	11	12	13	14	15	
CAREER APPOINTMENT	0	0	0	0	2	0	0	0	0	0	1	2	1	0	0	6
CAREER CONDITIONAL APPOINTMENT	0	0	2	6	9	7	7	1	4	0	11	19	23	10	6	105
EXCEPTED APPOINTMENT	0	0	0	49	98	23	19	1	11	0	8	5	5	1	0	220
EXCEPTED APPOINTMENT NTE	0	14	5	37	5	2	6	0	0	0	0	0	0	1	0	70
REINSTATEMENT - CAREER	0	0	0	0	10	1	2	0	1	0	1	9	6	0	0	30
REINSTATEMENT - CAREER/CONDITIONAL	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
REINS-SES Career	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
SES Career Appt	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
TERM APPOINTMENT NTE	0	0	0	0	1	2	4	0	0	0	0	0	0	0	1	8
TRANSFER	0	0	0	0	6	4	3	2	3	0	3	5	13	3	3	45
Grade Total	3	14	7	92	131	39	41	4	19	0	24	40	49	15	10	488

**Figure 36. Maintenance Hiring Projections**

Based on anticipated FTE levels, attrition trends, and vacancies, OST can forecast the number of hires needed over the next two years to maintain current workforce levels. The table below shows the hiring/losses required based on a 100% fill rate and a 90% fill rate, factoring in attrition (using the average 7.7% seen in OST over the last seven FYs).

	2010	2011	2012	Totals
1 Total Funded/Requested FTE	684	710	710	
2 Total Encumbered	692			
3 Target End Strength at 100% by end of FY		710	710	
4 Target End Strength at 90% by end of FY		639	639	
5 New FTE to be Added in FY at 100% Staffing		26	0	26
6 New FTE to be Added in FY at 90% Staffing		-45	-71	-116
7 Attrition Expected at 100% Staffing		54	55	108
8 Attrition Expected at 90% Staffing		51	52	103
9 Hiring Required to Fill 100% Vacancies		80	55	134
10 Hiring Required to Fill 90% Vacancies		6	-19	-13

**OST WORKFORCE PLAN**  
**July 2011 - FINAL**

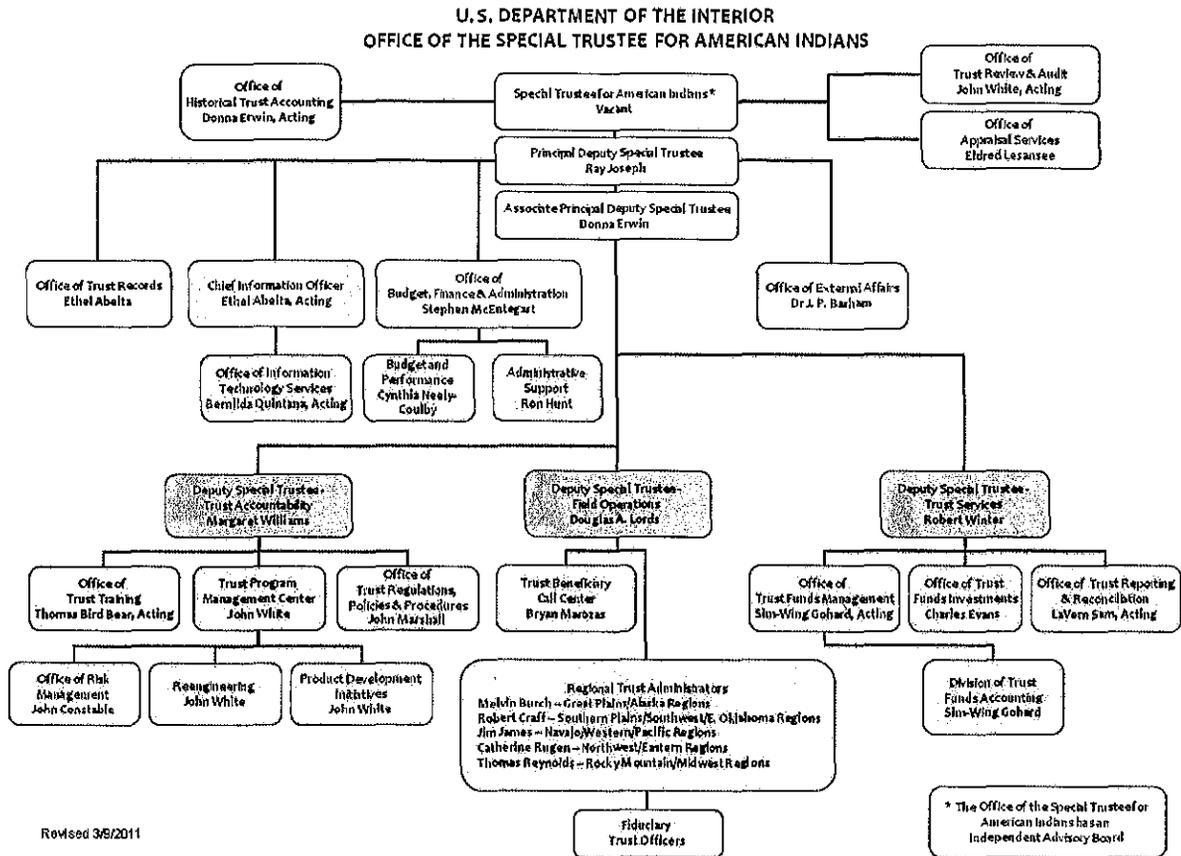
	NOTES
1	From OST Budget Justification Fiscal Year 2012
7, 8	Attrition is based on average annual rate of 7.7% and is calculated using the end strength from the prior year plus one-half of the new FTE to be added. New FTE are annualized at 50 percent since not all personnel are on board at the beginning of the year and are instead added incrementally.
9	100% of Funded Billets
10	90% of Funded Billets
	OST is currently staffed at 97.5% of funded staffing.

## **Appendix C - OST Functions and Mission Areas**

### **Overview of OST**

The current OST organizational structure is designed to enable the Department of the Interior to better fulfill the Department's trust responsibilities. The structure provides enhanced beneficiary services and organizational accountability while grouping organizational functions more efficiently. Leadership of OST is provided by the Special Trustee who, by statute, is appointed by the President with the advice and consent of the Senate. The Special Trustee is assisted in fulfilling the responsibilities of the position by the Principal Deputy Special Trustee, Senior Executive Service position. Three Deputy Special Trustees (Trust Accountability, Field Operations, and Trust Services) who are career Senior Executives report to the Associate Principal Deputy Special Trustee. The Assistant Director Information Resources, Office of Budget, Finance, and Administration, and Office of External Affairs report to the Principal Deputy Special Trustee. The Office of Trust Review and Audit and Office of Appraisal Services report to the Principal Deputy Special Trustee. The Special Trustee, Principal Deputy Special Trustee and a small staff are located in Washington, D.C. The Associate Principal Deputy Special Trustee, three Deputy Special Trustees, and staff are located in Albuquerque, New Mexico. The field structure is managed by the Deputy Special Trustee for Field Operations who is assisted by five Regional Trust Administrators, who are career Senior Executives. The five Regional Trust Administrators provide management, leadership, and supervision of 52 Fiduciary Trust officers and their staff who are located throughout Indian country. The five Regional Trust Administrator positions are located in Albuquerque, New Mexico.

**Organization Chart – U.S. Department of the Interior, Office of Special Trustee for American Indians**



OST is headquartered in Washington, D.C., with financial management and other functions administered in Albuquerque, NM, and staff located throughout Indian Country.

**Office of the Special Trustee for American Indians**

The politically appointed Special Trustee for American Indians is based in an office in Washington, D.C. Executive leadership and guidance provided by the office affects all levels of OST. The Special Trustee guides the delivery of beneficiary services, promotion of tribal self-governance and self-determination, management of financial trust assets and monitoring efforts to improve the way the Department carries out its fiduciary trust responsibilities. The Special Trustee also works with Congress, other government agencies such as the Office of Management and Budget and the Department of Justice, as well as other Interior offices, such as the Bureau of Land Management, and the Bureau of Indian Affairs, to coordinate Indian trust reforms. The Principal Deputy Special Trustee is based in Albuquerque, NM, and is responsible for overseeing all day-to-day operations, and management of all OST offices except the Office of Appraisal Services and the Office of Trust Review and Audit.

### **Office of Trust Review and Audit**

This office was established to oversee Indian Affairs' delivery of trust products and services to beneficiaries, and to support senior management in their duties to carry out Interior's fiduciary responsibilities. This office reviews the performance of trust programs and operations to ensure that the functions are performed to the highest standards, and reports directly to the Special Trustee. Work supports the trust reform goals to improve beneficiary services by ensuring that all organizations involved in trust management are working together in the most effective and cost-efficient way. Review and Audit staff works with both tribes and Interior trust staff throughout the nation on reform work, and to prepare corrective action plans and ensure completion of these plans.

### **Office of the Chief Information Officer**

This office, based in Albuquerque, is responsible for OST's Information Technology Services, and the Office of Trust Records. Much of OST's fiduciary responsibility involves using the most efficient accounting, title and ownership computer systems so that offices across the nation are all working with the same data. OCIO work is integral to the trust reforms that are currently being implemented. The Information Technology Services staff develops, maintains, and operates all of OST's major accounting and land title computer systems for the management of trust data. OCIO is responsible for managing all contract computer systems and personnel. OCIO is also in charge of all the Office of Trust Records management. Staff that work in the records program provide guidance and support on records management to all BIA and OST program offices. They are responsible for working with the Archivist of the United States, and for gathering, protecting and moving BIA and OST Indian trust and non trust records. The office also provides technical records assistance at field office locations. In partnership with the National Archives, the Office of Trust Records manages the safeguarding of inactive records at one the most high-quality records storage facilities in the United States, the American Indian Records Repository, in Lenexa, Kansas.

### **Budget, Finance, and Administration**

The Office of Budget, Finance, and Administration (BFA), based in Washington, D.C., provides budget, planning and analysis support, and oversees the administration of personnel, acquisition, finance, and contracts. BFA also provides administrative support for procurement, property, safety, planning and mail services. BFA is responsible for distributing checks and statements to beneficiaries.

### **External Affairs**

The Office of External Affairs, based in Washington, D.C., is responsible for communicating with Indian trust beneficiaries through newsletters, media, and the development of materials to describe the status of trust activities for account holders. As well, External Affairs is responsible for communication with Congress on trust matters. External Affairs also works with tribes across the nation to implement OST's self-governance and self-determination programs, and when tribes apply to withdraw their funds from trust for self-management.

### **Trust Accountability**

The Office of Trust Accountability, in Albuquerque, includes the Office of Trust Training, the Trust Program Management Center, and the Office of Trust Regulations, Policies and Procedures. The Office of Trust Training develops and coordinates training for the Department and tribal staff on fiduciary standards and practices. This office also helps manage and facilitate courses at the National Indian Programs Training Center in Albuquerque. The Trust Program Management Center (TPMC) provides the project development and coordination to carry out reform activities, including the implementation of the new lockbox payment collection system, the distribution of new quarterly account performance statements, and implementation of reformed practices. The TPMC also reports on progress made and

resources expended toward overall trust program objectives. The Office of Trust Regulations, Policies and Procedures coordinates the implementation of written policies and procedures governing the performance of the Department's fiduciary trust responsibilities.

### **Field Operations**

Field Operations employees work directly with individual and tribal trust beneficiaries across the country. With the establishment of Regional Fiduciary Trust Administrators (RTA) and the placement of Fiduciary Trust Officers (FTO) throughout Indian Country, Field Operations provides beneficiary services in cooperation with the BIA. RTAs provide technical assistance on trust matters to their staff and BIA, and supervise FTOs. FTOs and support staff provide beneficiaries with accurate and quick access to account information and trust products and services. FTOs also coordinate the management of trust assets with BIA in their geographic areas, and provide guidance to support staff in the management of accounts. The Trust Beneficiary Call Center (TBCC) is an additional resource within Field Operations for Indian trust beneficiaries. The nationwide call center provides "one-stop" service for beneficiaries including providing information regarding account statements, account balances, receipts, disbursements, leases, probate status, Whereabouts Unknowns, and other trust activities. Since inception, the Center received over 130,000 calls and was able to answer the beneficiary on the first call for approximately 90 percent of the requests. This allows BIA and OST field staff to focus on operational duties without interruption.

### **Trust Services**

Trust Services, based in Albuquerque, includes the offices of Trust Funds Management and Reporting and Reconciliation. The Trust Funds Management office manages the investment and reporting for approximately \$3.3 billion held in trust for Indian tribes and individual Indian beneficiaries, including the Alaska Native Escrow Fund. The programs' objectives are to manage and invest funds to provide prudent rates of return and to quickly and accurately collect, disburse, and account for funds associated with trust assets. Trust Services works directly with field offices to ensure appropriate cash management processes are used, and directs and controls the buying, selling and trading of investment instruments. The Trust Services' investment group has a direct link to the Bloomberg Service in order to execute security trades on a timely basis and at a prudent price. The Reporting and Reconciliation office is responsible for reconciling accounts and monitoring trust funds activities. This office prepares internal and external financial accounting reports for trust funds and prepares appropriate external reports and required tax forms. This office also ensures that beneficiary statements of performance are issued.

### **Office of Appraisal Services**

Appraisals are a critical element to the management of trust land. They are used to determine the fair market value of the use of an Indian trust asset. To establish a lease, negotiate a grazing permit or build a communications tower on Indian trust land, an appraisal is required to provide the beneficiary and BIA with information on the fair market value of the land to support that activity. As part of Interior's trust reform efforts, staff members at the Office of Appraisal Services (based in Washington, D.C., with staff throughout Indian Country) are addressing a backlog of appraisal requests to support trust transactions. OAS staff works with area contractors and tribes to reduce and prioritize backlogged requests. The Director of the Office of Appraisal Services currently reports directly to the Special Trustee in Washington, D.C.

## **Appendix D – Workforce Planning at OST**

Workforce planning is an iterative, long-term, continuous, integrated business management practice producing a seamless alignment of mission, goals, budget, stakeholders, employees, and results. It requires a careful assessment of the organization's purpose (mission), what it is striving to achieve toward that purpose, what interim steps it expects to perform, what competencies it requires to perform these tasks, and what competencies it lacks.

The U.S. Office of Personnel Management (OPM) defines workforce planning as “the process of ensuring that the right people are in the right place, and at the right time to accomplish the mission of the agency...More specifically, workforce planning is a systematic process for identifying and addressing the gaps between the workforce of today and the human capital needs of tomorrow.”

The Department of the Interior's 2001 Workforce Planning Guide includes a number of reasons why DOI components should engage in workforce planning. The guide identifies, among others, the following reasons for workforce planning:

“Strategic basis for human resource decisions.... helps the organization as a whole forecast future conditions and develops objectives for the human resource programs to meet the DOI/Bureau needs...”

“Links expenditures to organization's long-term goals and objectives....WFP can reduce... costs by ensuring more efficient and effective recruitment, training, and retention. It also provides other benefits such as background information for position management and succession planning...more useful information on EEO and workforce diversity.”

“Links recruitment, development and training decisions to organizational goals...provides a clear rationale for linking expenditures for recruitment, training, employment development, retention, and other human resource programs...”

“Address changes in program direction that impacts the type of work being performed and/or how the work is being performed...allows managers to identify ways in which technology and other business changes impact the skills required in the workforce...”

OST's workforce plan positions the agency to carry out reform activities under the FTM. The FTM is grounded in the CTM, which is a strategic plan for the direction of trust reform. The CTM, in turn, is linked to DOI's strategic plan through the Serving Communities – Fulfill Indian Trust Fiduciary Trust Responsibilities End Outcome Goal. Accordingly, OST's workforce plan links to the Department's strategic plan, ensuring that OST's workforce is advancing the mission of the Department of the Interior.

## How Workforce Planning Relates to Special Trustee Recommendation on Continuation

In addition to the business and practical reasons for workforce planning, a recent Government Accountability Office (GAO) report recommended that OST develop a workforce plan for future trust fund operations identifying future staffing and funding needs as trust reforms are completed.<sup>10</sup> The Department agreed that such a plan would be useful.

GAO's report cited the potential timetable for implementing the remaining reforms identified in the plan, including a date for the proposed disposition of the Office. While the American Indian Trust Fund Management Reform Act of 1994 (Public Law 103-412, the Act), requires "A timetable for implementing the reforms identified in the plan, including a date for the proposed termination of the Office" (Section 4043(a)(2)(C)), the Act first requires that the Special Trustee "ensure that reform of such practices in the Department is carried out in a unified manner and that reforms of the policies, practices, procedures and systems of the Bureau of Ocean Energy Management, Regulation and Enforcement, and Bureau of Land Management, which carry out such trust responsibilities, are effective, consistent, and integrated;" and "ensure the implementation of all reforms necessary for the proper discharge of the Secretary's trust responsibilities to Indian tribes and individual Indians." (Section 4041(2) and (3)). In addition, Section 4042 (C)(l) entitled "Conditioned upon implementation of reforms" states "The Special Trustee, in proposing a termination date under Section 4043(a)(2)(C) of this title, shall ensure continuation of the Office until all reforms identified in the strategic plan have been implemented to the satisfaction of the Special Trustee."

The intent of the reform Act was to provide for more effective management of, and accountability for the proper discharge of, the Secretary's trust responsibilities to Indian tribes and individual Indians by establishing in the Department of the Interior an Office of Special Trustee for American Indians to oversee and coordinate reforms within the Department of practices relating to the management and discharge of such responsibilities. Since the Act was passed in 1994, OST has been given (legislatively or via Departmentally directed reorganizations) more and more responsibilities and a greater mission. For example, OST created the Office of Trust Records in 1999 to ensure that Indian records are maintained and safeguarded. Responsibility for Indian land appraisals was also transferred from BIA to OST in 2002. In April 2003, the Secretary of Interior reorganized BIA and OST creating six Regional Trust Administrators who are responsible for providing account holders with trust services and for overseeing Fiduciary Trust Officers in the field. Thus, in addition to reform-specific work underway in OST, OST also has core mission functions directly related to the management of its fiduciary trust responsibility for Tribal and IIM beneficiaries.

Should OST eventually be realigned from its status as an independent entity in the Office of the Secretary to an organizational location elsewhere in the Department, the Department would still need to continue to provide fiduciary trust services to beneficiaries (in the form of beneficiary support and services, trust accounting and management, records storage and maintenance, account management and support, trust review and audit, trust reporting, trust regulation and policy, trust training, outreach, and other related services). Absent a significant external factor (such as significant numbers of withdrawals of trust assets or legislation which affects the trust mission of OST), OST does not anticipate a significant change in basic trust management operations or the volume of services currently being provided to beneficiaries. Accordingly, this workforce plan is structured assuming that OST's functions will continue into the future essentially as they are today. As the remaining trust reform tasks are completed over the next two years and should OST be realigned to an existing DOI Bureau, an assessment will be made to determine the extent to which personnel needed for certain functions may then be increased or decreased.

<sup>10</sup> GAO, *Indian Issues, The Office of Special Trustee Has Implemented Several Key Trust Reforms Required by the 1994 Act, but Important Decisions about Its Future Remain*, GAO-07-104 (Washington, D.C.: December 2006).

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## Workforce Planning Methodology Employed

In October 2011, OST began development of the workforce plan. The plan used the methodology recommended in the Department of the Interior's five-step workforce planning model. DOI's model mirrors OPM's model and was adopted by DOI and has been employed in OST to ensure that OST's plan met both the Departmental guidance and the leading practices in this area.

This plan only represents the first three Phases as Phase 4 involves implementation of the plan and Phase 5 involves monitoring, evaluating, and revising the plan in future years.

The workforce planning model includes the following five major phases (a short summary of each is included):

### **Phase 1: Strategic Direction Setting**

- Organizing and mobilizing strategic partners
- Setting vision/mission values/objectives
- Reviewing organizational structure and conducting business process reengineering
- Measuring organization performance
- Positioning HR to be a strategic partner

### **Phase 2: Supply, Demand & Discrepancies**

- Analyzing demographics, workforce trends, workforce projections, workforce diversity, educational pipeline
- Conducting competency assessments
- Comparing workforce needs against available skills

### **Phase 3: Develop Action Plan**

- Designing a workforce plan to address skills gaps
- Setting specific goals and developing a HR infrastructure

### **Phase 4: Implement Action Plan**

- Communicating the workforce plan
- Gaining an organizational buy-in
- Conducting organizational assessments
- Conducting recruitment, hiring and placement
- Conducting succession planning
- Restructuring where necessary
- Implementing retention strategies

**Phase 5: Monitor, Evaluate, Revise Plan**

- Assessing successes and failures
- Making adjustments to the plan
- Addressing new workforce and organizational issues

**DOI Workforce Planning Model**

