



United States Department of the Interior  
OFFICE OF THE SPECIAL TRUSTEE FOR AMERICAN INDIANS  
Washington, D.C. 20240

November 14, 2001

Memorandum

To: Secretary

From: Special Trustee for American Indians  
Assistant Secretary – Indian Affairs

Subject: Trust Organization

Attachment 1 is a proposed organization and management structure for the Department's Indian trust asset management function. A briefing paper with information on the proposed organization and management structure is included in Attachment 2.

As you know, for the past several weeks a senior group has been evaluating alternative trust organization and management structures for Indian trust asset management, identifying several options that could lead to a more effective structure. The Special Trustee contributed a typical structure for trust operations as found in commercial sector trust banking. In addition, the Judge in the Cobell v Norton class action litigation was critical recently of the Department because he could not readily identify a single individual in charge of trust reform. Periodically we have briefed you on the status of our efforts, and received your input on the options.

As we closed on a structure that would establish an effective, accountable organization, it became apparent that a dramatic change in organization and management structure for Indian trust reform and trust operations was needed. Concurrently, EDS was drawing a similar finding and conclusion in its assessment of the TAAMS and BIA Data Cleanup sub projects. At the request of the Deputy Secretary, EDS evaluated the group's proposed organization and structure and commented favorably (Attachment 3). In consonance with EDS' suggestions, a separate element will be organized and devoted to beneficiary services. This element will put the beneficiary—Tribes and Individual Indian account holders—as the focus of the Indian Trust Asset Management organization.

The structure we recommend has the strength of, once and for all, establishing a single, accountable manager and management structure for the conduct of most Departmental Indian trust operations and trust reform.

Therefore, we believe and concur that the Department should reconfigure trust asset management activities along the lines of the organization and management structure found in Attachment 1, and recommend your approval of this organizational concept.

I CONCUR: Sec 11/14/01 memo I DO NOT CONCUR: \_\_\_\_\_  
Secretary of the Interior Secretary of the Interior

3 Attachments, as stated