



NIGC DRAFT STRATEGIC PLAN

2018-2022

NIGC
1849 C Street NW Mail Stop 1621 Washington, DC 20240

Contents

Introduction	1
Organizational Structure.....	2
Mission.....	2
Vision.....	2
Strategic Plan Development	2
Consultation Efforts	4
Strategic Plan Framework	4
External Risk Factors	5
Performance Tracking and Reporting	5
Strategic Goal 1: Gamesmanship – Protect against anything that amounts to gamesmanship on the backs of tribes through meaningful communication, training, and technical assistance and utilizing NIGC’s enforcement authorities, when necessary.....	6
Strategic Goal 2: Strong Workforce – Maintain a strong workforce both within the Agency as well as with NIGC’s tribal regulatory partners.....	9
Strategic Goal 3: Technology – Leverage reliable and emerging industry technology trends to support tribal economic development, self-sufficiency and the integrity of Indian gaming.....	12
Strategic Goal 4: Rural Outreach – Develop and execute a plan for small rural gaming tribes that reviews training, technical assistance and regulations.....	15
Strategic Goal 5: Operational Excellence – Deliver appropriate resources, solutions, and services in an efficient and effective manner to benefit stakeholders.....	17
Appendix A: Organizational Chart	19
Appendix B: Operating Divisions & Their Functions	20
Appendix C: NIGC Offices	21

Introduction

The National Indian Gaming Commission (“NIGC” or “Commission” or “Agency”) was created by Congress through the Indian Gaming Regulatory Act of 1988 (P.L. 100-497). The Indian Gaming Regulatory Act (IGRA) established the NIGC as an independent federal regulatory agency within the Department of the Interior. IGRA was enacted with the express purpose to support and promote tribal economic development, self-sufficiency and strong tribal governments through the operation of gaming on Indian lands. 25 U.S.C. § 2702.

IGRA created the NIGC to protect tribal gaming as a means of generating revenue for tribal governance and tribal communities. IGRA further provides a legal framework structured to safeguard tribes as the primary beneficiaries of their gaming operations, support the integrity of the Indian gaming industry, and assure that gaming is conducted fairly and honestly by both the operators and players.

The NIGC seeks compliance with IGRA, NIGC regulations and tribal gaming ordinances with 499 gaming establishments owned, operated or licensed by 245 federally recognized tribes located within 29 states. To do so, the Agency regulates and monitors tribal gaming activity, inspects gaming premises, conducts background investigations, analyzes audits of Class II and certain aspects of Class III gaming operations, and investigates violations of IGRA. The NIGC also coordinates its regulatory responsibilities with tribal regulatory agencies through the review and approval of tribal gaming ordinances and management agreements. The NIGC further provides technical assistance, including extensive training, to tribal leaders as well as tribal gaming commissions and operators.

When technical assistance and training do not achieve compliance with IGRA, NIGC regulations and the tribal gaming ordinance, the NIGC will undertake enforcement action, which may include imposing appropriate sanctions for such violations, such as civil penalties and orders for temporary closure as well as referring criminal matters to appropriate tribal, Federal and state entities. As the NIGC fulfills these responsibilities, the Agency closely reviews any indications of corrupting influences, such as gamesmanship by non-tribal governmental entities.

Organizational Structure

The Commission is composed of three full-time members, including a Chair and two Associate Commissioners. The Chair is appointed by the President and confirmed by the Senate. The two Associate Commissioners are appointed by the Secretary of the Interior after public notice and comment. The Commission selects a Vice Chair by a majority vote. At least two members of the Commission must be members of a federally recognized Indian Tribe and no more than two may be of the same political party.

Led by the Chair, the NIGC staff is composed of the Office of the Chief of Staff and the Office of General Counsel with approximately 130 full-time employees at the Commission’s

headquarters in Washington, D.C., seven regional offices, and two satellite offices. The Office of the Chief of staff oversees four operational divisions including the Division of Public Affairs, Division of Finance, Division of Technology and the Division of Compliance to accomplish NIGC's mission and support the Commission's vision.

Appendix A includes the organizational chart for the NIGC. Appendix B shows the operating divisions and their functions within the NIGC. Appendix C provides a listing of the NIGC offices.

Mission

The NIGC's mission is to (1) promote tribal economic development, self-sufficiency and strong tribal governments; (2) maintain the integrity of the Indian gaming industry; and (3) ensure that Tribes are the primary beneficiaries of their gaming activities. To fulfill its mission and achieve compliance, the NIGC works within the framework created by the IGRA by providing sound guidance, removing unnecessary roadblocks, and sensibly regulating gaming activities conducted by sovereign Indian tribes on Indian lands without stymieing the economic development and entrepreneurial spirit of tribes.

Vision

The Commission's vision is to utilize all of its regulatory tools, including training, technical assistance, public education, and enforcement, to empower and partner with tribal governments to ensure regulatory compliance and gaming integrity that respects the capabilities and responsibilities of each sovereign tribe.

Strategic Plan Development

Every four years, the NIGC updates its strategic plan to reflect the Agency's current priorities and initiatives and how it will accomplish them. The strategic plan presents the NIGC's long-term goals and strategies for achieving effective federal regulation of Indian gaming in coordination with regulatory partners.

To develop the strategic plan, the NIGC established a strategic planning team to provide a comprehensive review of the Agency, its mission, and current initiatives in order to draft a plan outline for Commission and NIGC management review. This team included staff from each principal department and each operational division to contribute to the development of the strategic plan. Meetings were held to formulate the objectives and strategies based on goals established from the NIGC's current mission, priorities, and initiatives.

The strategic plan was prepared pursuant to the requirements of the GPRA Modernization Act of 2010. This plan updates and supersedes the strategic plan covering fiscal years 2014 – 2018.

Consultation Efforts

The NIGC followed the consultation requirements set forth in the GPRA Modernization Act of 2010, Executive Order 13175 “Consultation and Coordination with Indian Tribal Governments,” the National Indian Gaming Commission Policy on Consultation with Indian Tribes, and guidance from the Office of Management and Budget in the development of this strategic plan. The NIGC recognizes the importance of tribal consultation in formulating policy and maintaining the government-to-government relationship with tribal nations. To engage with tribal leaders, the NIGC sent written notice of the availability of the draft strategic plan and held a webinar to present and hear comments on it, followed by a comment period of more than a month. The NIGC also engaged the public by posting the draft strategic plan for comment to the NIGC website (<https://www.nigc.gov/commission/strategic-plan>). The NIGC also notified the President and Congress of the availability of the strategic plan. The NIGC further requested input from the Office of Management and Budget. All comments have been taken into consideration in the strategic plan.

Strategic Plan Framework

The NIGC Strategic Plan FY 2018 – 2022 includes five strategic goals:

- **Goal 1: Gamesmanship** – Protect against anything that amounts to gamesmanship on the backs of tribes through meaningful communication, training, and technical assistance and utilizing the NIGC’s enforcement authorities when necessary
- **Goal 2: Strong Workforce** – Maintain a strong workforce both within the Agency as well as with NIGC’s tribal regulatory partners
- **Goal 3: Technology** – Leverage reliable and emerging industry technology trends to support tribal economic development, self-sufficiency and the integrity of Indian gaming
- **Goal 4: Rural Outreach** – Develop and execute a plan for small rural gaming tribes that reviews training, technical assistance and regulations
- **Goal 5: Operational Excellence** – Deliver appropriate resources, solutions, and services in an efficient and effective manner to benefit stakeholders

These five strategic goals focus primarily on the core initiatives of the NIGC and articulate the Commission’s priorities. The associated objectives are mission- and management-focused in achieving these goals. Within each objective, there are strategies that identify actions that will be taken for accomplishing the goals. There are set performance measures to track the progress in achieving each objective. The external risk factors highlight possible challenges the NIGC may encounter in achieving its strategic goals.

External Risk Factors

The following are key external factors that could significantly and adversely affect the ability of the Commission to achieve its strategic goals:

- IGRA requires that Indian tribes are the primary beneficiaries of gaming revenues and this requirement is an important element of the Commission's vision. Gaming revenues have played a vital role in the economic development of Indian tribes and those revenues are dependent on the broader economy. A sharp downturn in the local or national economy could adversely affect the gaming public's amount of disposable income, thereby reducing Indian gaming patronage and resulting in a decrease in Indian gaming revenues.
- The Commission is comprised of a Chair and two Commissioners. The Commission has quorum with two members, and certain regulatory actions require a quorum. The sudden and unexpected departure of two Commissioners would paralyze the Commission until such time that new Commissioners could be appointed.
- The Commission is a very small agency, with approximately 130 full-time employees. Extensive litigation against the Commission would result in a shift of limited agency resources, normally dedicated to regulatory oversight functions (e.g., reviews of management contracts and tribal gaming ordinances, drafting of Indian land opinions, etc.), to litigation needs.
- The decision in *Colorado River Indian Tribes v. National Indian Gaming Commission*, 466 F.3d 134 (D.C. Cir. 2006), limited the Commission's authority to prescribe minimum internal control standards for class III gaming activities, and prevents the Commission from auditing high-risk class III gaming facilities. Other future court or legislative decisions may further influence the scope of the Commission's regulatory authority.
- Commission personnel often have to drive long distances to remote locations of the country in order to perform site visits of tribal gaming facilities. Prolonged, severe weather conditions in certain parts of the country may prevent Commission personnel from conducting site visits, consultations, and other mission-oriented travel.
- The Commission maintains partnerships with other Federal agencies. In those circumstances when the Commission has to rely on these other agencies for factual information, documentation, or to perform investigations, the Commission may be inhibited in its ability to make timely determinations due to funding and/or capacity challenges of these agencies or tribal partners. Similarly, when the Commission is requested by other Federal investigatory agencies to postpone enforcement actions while they conduct their own criminal and/or civil investigations, the Commission's regulatory activities may be delayed.
- The lack of a "Seminole fix." The United States Supreme Court in *Seminole Tribe of Florida v. Florida*, 517 U.S. 44 (1996) concluded that Congress did not waive States' immunity from suit by Indian tribes for failing to negotiate compacts in good faith, thus shifting the balance of power in tribal-state compact negotiations. As a result, some tribes have not achieved the full benefit of the IGRA scheme through Class III gaming and rely exclusively on Class II gaming. This places a greater Class II compliance oversight burden on the Commission.

Performance Tracking and Reporting

The NIGC is committed to monitoring and improving its services provided under each strategic goal. This is accomplished through the evaluation of the performance of these services in achieving its objectives. Progress in achieving the performance measures is presented annually in the NIGC's Budget Justifications which includes a section for the Annual Performance Report.

Gamesmanship

Strategic Goal 1: Gamesmanship – Protect against anything that amounts to gamesmanship on the backs of tribes through meaningful communication, training, and technical assistance, and utilizing the NIGC's enforcement authorities when necessary

The NIGC has identified "gamesmanship" as a tactic by non-tribal governmental interests to manipulate business, professional, and employment relationships associated with Indian gaming operations to further their own interests at the expense of the tribal gaming operation and the tribal government. Gamesmanship often results in a third-party and the tribal government violating IGRA, NIGC regulations, or the tribal gaming ordinance.

Gamesmanship violations arise directly out of IGRA and often involve management of a tribal gaming operation without an approved management contract, misuse of gaming revenue, or a violation of the sole proprietary interest requirement. Gamesmanship is even more egregious when the parties engaging in gamesmanship have exercised undue influence over the tribal government decision-making process, as can be the case when the gamesmanship is facilitated by trusted tribal advisors.

The NIGC is taking a targeted approach based on IGRA's statutory authorities to ensure that tribal governments are truly the primary beneficiaries of their gaming operations by reducing gamesmanship in the Indian gaming industry and helping tribal governments develop ways to detect and prevent gamesmanship before it occurs. The NIGC is committed to providing tribal governments, tribal regulators and operators with assistance. This is achieved by the following: (1) enhancing awareness of gamesmanship and improve tribal governments' and tribal regulators' ability to detect the occurrence of gamesmanship; and (2) preventing and/or eliminating ongoing gamesmanship by offering training and technical assistance and/or utilizing the NIGC's enforcement authorities to ensure that the gaming fulfills the legislative purposes of IGRA.

Objective 1.1: Enhance awareness of gamesmanship and improve tribal government, regulator, and operator capacity to detect the occurrence of gamesmanship.

The NIGC aims to work with tribal governments and regulatory partners at all stages when gamesmanship could occur, from development of a new gaming facility through contracts and other agreements, to ongoing daily activities on the gaming floor. This requires strong partnerships within the Indian gaming industry to ensure that the NIGC continues to monitor the industry effectively. Ensuring compliance with gaming laws and regulations is essential to maintaining the integrity in the Indian gaming industry. The NIGC will implement eight strategies described below to achieve this objective.

Strategies:

- Create and update hands-on and on-demand training courses to improve tribal governments', regulators', and gaming service providers' ability to identify and prevent gamesmanship violations;
- Ensure tribal governments, regulators, and operators receive coordinated and consistent information;
- Build partnerships within the Indian gaming industry through a team approach to identify common avenues and methods of gamesmanship;
- Meet with tribal leadership, regulators, and operators to encourage training and technical assistance requests;
- Utilize the declination process within the Agency's Office of General Counsel to review unexecuted contracts and agreements that may contain offending provisions;
- Create and improve tools and technology used to identify and prevent gamesmanship;
- Develop and maintain a collection and analysis of data related to gamesmanship to provide decision makers current and relevant information; and
- Identify and utilize all resources available to the Agency to detect and prevent gamesmanship and enforce when necessary, including making referrals to agencies with criminal and other civil jurisdiction.

Performance Measures

- Number of engagements where NIGC leadership and staff discuss the elements of gamesmanship and the resources available to our regulatory partners.
- Number of gamesmanship training courses offered each year.
- Number of attendees at gamesmanship training events each year.
- Percentage of attendees that identify through anonymous polling that they may have gamesmanship issues at their facilities.
- Percentage of attendees who passed knowledge review questions during training events.
- Type and number of formal actions taken to protect against gamesmanship on the backs of tribes.

Objective 1.2: Prevent and eliminate ongoing gamesmanship by utilizing the NIGC's enforcement authority to ensure that gaming fulfills the legislative purposes of IGRA.

In identifying compliance weaknesses through analysis of data and providing outreach to those tribal governments, tribal regulators and operators, it is essential that a plan of action be developed to address these weaknesses before an enforcement action is initiated. By working with tribal governments, tribal regulators and operators, a compliance-based approach can be achieved as tribal regulators are able to provide alternative options and remedies. Site visits and the analysis of the tribal gaming operations' audited financial statements, management letter(s), and if applicable, agreed-upon procedures (AUP) report provide opportunities to address compliance issues. A thorough review and reporting process ensures quality reports that explain what was found and why corrective actions, if any, are required. Although these processes are in place, there may be circumstances where an enforcement action is necessary and appropriate. The NIGC will implement six strategies described below to achieve this objective.

Strategies:

- Conduct site visits at gaming facilities, tribal gaming regulatory authorities, and other tribal entities to detect conditions of risk and incidences of ongoing or prior gamesmanship violations;
- Review submitted unexecuted contracts and agreements for potential gamesmanship;
- Analyze audited financial statements and AUP reports submitted for potential gamesmanship violations or conditions that create a risk for gamesmanship;
- Develop trusted contacts within the industry that have access to information about gamesmanship occurring or about to occur;
- Develop and maintain strong working relationships with tribal regulators to address gamesmanship bilaterally when appropriate; and
- Implement and enforce Indian gaming laws consistently and investigate and take actions to address potential violations of Indian gaming laws.

Performance Measures

- Number of engagements conducted by NIGC leadership and staff for which the purpose is to discuss a gamesmanship violation(s) or potential violation(s).
- Number of site visits performed each year that include awareness efforts, technical assistance for detection/prevention, or investigative steps performed by NIGC staff.
- Number of potential gamesmanship issues identified as a result of review of audited financial statements and AUP reports submitted by tribal gaming operations.
- Number of unexecuted contracts and agreements reviewed by the NIGC Office of General Counsel for potential gamesmanship.
- Number of unexecuted contracts reviewed by the NIGC Office of General Counsel that contained elements of gamesmanship.
- Number of unexecuted contracts amended by tribal governments based on the NIGC

Office of General Counsel's findings and technical assistance.

- Number of confirmed gamesmanship violations identified by the NIGC Compliance Division.
- Number of gamesmanship violations remedied by the tribal government based on the NIGC Compliance Division's findings.
- Number of gamesmanship violations resulting in enforcement actions, including settlement agreements.
- Average time for NIGC to complete investigative and enforcement process from the date of opening an investigation to resolution (investigation closure, settlement agreement, or other enforcement action) of gamesmanship violations.
- Number of referrals to other agencies and a list of agencies to which referrals were made.

Strong Workforce

Strategic Goal 2: Strong Workforce – Maintain a strong workforce both within the Agency as well as with NIGC's tribal regulatory partners

Maintaining a strong workforce is twofold within the NIGC. First, the Agency is statutorily required by IGRA to support the self-sufficiency and self-determination of tribes, and supporting the tribal gaming workforce is an important goal to achieve tribal self-sufficiency. Second, the Agency must also support its own staff and employees that serve the tribal gaming industry.

The 2006 IGRA amendments direct the NIGC to provide technical assistance to tribal governments engaged in Indian gaming. The tribal gaming workforce has a significant part to play in supporting tribal self-sufficiency and protecting tribal gaming revenues. In order to support the workforce of NIGC's tribal partners and carry out IGRA's purposes, the NIGC provides training and technical assistance.

Further, the NIGC values its employees and is taking every opportunity to make the NIGC the best place to work in the federal government. The NIGC will continue to invest in its employees through improved performance management and training opportunities. Efforts are also focused on improving internal processes and promoting diversity and inclusion within the workforce. Employee accountability will be addressed through employee performance plans and annual action plans resulting from the Federal Employee Viewpoint Survey.

The NIGC is committed to craft trainings that are carefully targeted to meet the evolving needs of the Agency, as well as regulatory partners, and address high priority matters critical to safeguarding the Indian Gaming industry. The NIGC will utilize technology offering on-line and on-demand training to allow for live video-conferencing training events that will reach employees and tribes across Indian country. In addition, the Agency will invest in the Agency's employee training, work-life programs, and performance management to recruit, hire and retain the most qualified and motivated employees to ensure a talented and diverse workforce.

Objective 2.1: Provide training to tribal regulatory partners to promote tribal economic development, tribal self-sufficiency, and strong tribal governments.

The NIGC works to educate tribal governments, tribal regulators, and operators on Indian gaming law and regulations so they may make well-informed decisions. The NIGC will implement four strategies described below to achieve this objective.

Strategies:

- Conduct training events that provide a consistent approach from a variety of methods that supports the purposes of IGRA;
- Maintain a library of training material for Agency staff to use to provide consistency in presentations;
- Continue to support the development and delivery of training courses essential to maintain a highly effective workforce; and
- Strengthen the impact and effectiveness of training by fostering best practices, facilitating partnerships, and identifying gaps in training.

Performance Measures
<ul style="list-style-type: none">• Number of training events held annually.• Number of individuals attending training events annually.• Percentage of training evaluations with a "strongly agree" or "agree" rating on meeting expectations overall for instructor, course content, and materials.• Percentage of attendees who passed knowledge review questions during training events.

Objective 2.2: Utilize technology and a variety of hands-on learning and virtual learning modalities to support efficient and effective training and technical assistance to regulatory partners.

To strengthen the tribal gaming workforce, it is important to provide varied methods of training that can meet the abilities of diverse learners. The NIGC will implement the five strategies described below to achieve this objective.

Strategies:

- Offer ongoing in-person and virtual access to training and development resources to support continual learning;
- Develop a Learning Management System;
- Link the Learning Management System to the Agency’s website for ease of access and user ability;
- Increase knowledge reviews on training courses offered; and
- Optimize the training experience through the use of various communication tools to support the improvement of training.

Performance Measures
<ul style="list-style-type: none">• Number of online presentations available.• Number of enrollments in online presentations annually.• Number and types of trainings made available annually.

Objective 2.3: Ensure the Agency creates reasonable goals for employee engagement.

The NIGC will foster an environment where employees have more opportunities to provide input into decisions and feel included and engaged. We will continue to motivate and support our employees. The NIGC will implement the three strategies described below to achieve this objective.

Strategies:

- Evaluate employee feedback based on the Federal Employee Viewpoint Survey (FEVS) results, utilize Office of Personnel Management (OPM) communication plan to market and promote FEVS participation;
- Create and execute FEVS Agency Action Plan based on previous year’s survey results; and
- Develop other tools to garner employee feedback to improve the Agency.

Performance Measures
<ul style="list-style-type: none">• Increase in Employee Engagement Index as measured by the FEVS.• Increase in New Inclusion Quotient as measured by the FEVS.• Items identified in FEVS Agency Action Plan addressed within established timelines.• Develop varied tools to garner employee feedback.

Objective 2.4: Invest in the Agency’s employee training, work-life programs, and performance management to recruit, hire, and retain the most qualified and motivated employees to ensure a talented and diverse workforce.

To ensure that the NIGC employees maintain expertise and are prepared for the future, we will continue to implement employee programs that foster development and knowledge sharing. We will assist our employees by providing timely training and development opportunities. We will also support supervisors and managers through training and providing resources to

strengthen our leadership. The NIGC will implement the seven strategies described below to achieve this objective.

Strategies:

- Conduct organizational development activities that involve skill-based and work-life opportunities or programs;
- Provide training that addresses skill gaps;
- Recruit and retain a high-quality, diverse staff through workforce planning;
- Support a culture of health and safety;
- Ensure access to employee services regardless of geographic location;
- Ensure effective use of the performance management system to manage employee performance; and
- Recognize employees for accomplishments and achieving the Commission’s vision.

Performance Measures

- Number of professional development opportunities for employees to attend within the agency.
- Number of health and safety courses and updates provided to employees annually.
- Percentage of employees recognized annually for accomplishments and achieving the Commission’s vision.
- Number of challenges (negative ratings of 35% or more) as reported by the FEVS or Number of strengths (positive ratings of 65% or more) as reported by the FEVS.
- Number of work-life opportunities or programs for employees to participate in within the agency.

Technology

Strategic Goal 3: Technology – Leverage reliable and emerging industry technology trends to support tribal economic development, self-sufficiency, and the integrity of Indian gaming

The NIGC is committed to staying ahead of the technology curve by integrating research, analysis and agency work to provide solutions and services in a manner that enables informed decisions and understanding of industry technology systems. The NIGC is committed to providing industry technology information for stakeholders to promote sound decision-making and dissemination of industry best practices.

A tribal gaming operation’s data and security measures are arguably the most valuable part of many gaming operations. The NIGC’s Division of Technology conducts training to bring awareness to and assist in alleviating technological vulnerabilities. The Division of Technology

also offers Information Technology Vulnerability Assessments (ITVAs) to tribes to evaluate the security vulnerability of their gaming data systems.

Within NIGC, technology also plays a vital role in improving agency communication, knowledge, and decisions by transforming and supporting data capabilities in a timely manner. Technology can enhance the learning experience, improve operations to deliver quality services and information, and improve the use of data.

This goal is achieved by the following: (1) staying up to date on developments in the gaming industry, including best practices and emerging technologies and utilizing the knowledge to raise awareness of these developments; (2) providing subject matter expertise to the Indian gaming industry in the field of technology; (3) strengthening information and communication systems to support timely decision making and the dissemination of information to all agency staff; and (4) maintaining the internal technology infrastructure and continuity of technology services.

Objective 3.1: Stay up to date on developments in the gaming industry, including best practices and emerging technologies and utilize the knowledge to raise awareness of these developments to our tribal regulatory partners.

The NIGC is committed to making the best use of our resources and assisting our stakeholders in providing information on industry technology trends and best practices. We will conduct research, collect data, perform analysis, and disseminate information to promote awareness of developments in the gaming industry. We will encourage greater sharing of best practices. The NIGC will implement four strategies described below to achieve this objective.

Strategies:

- Research industry technology trends and best practices;
- Identify or develop agency staff subject matter experts;
- Disseminate information to tribes, tribal regulators and operators; and
- Accelerate discovery of developments through the sharing of knowledge.

Performance Measures
<ul style="list-style-type: none">• Number of bulletins or reports issued providing technical assistance on gaming data systems.• Number of engagements conducted on industry technology trends and best practices.

Objective 3.2: Provide subject matter expertise to the Indian gaming industry in the field of technology.

The NIGC will focus on addressing and helping to manage industry technological vulnerabilities and continue to play a role in supporting educational efforts to enhance preparedness in alleviating these vulnerabilities of gaming data systems. These efforts will focus on providing

ITVAs at tribal gaming operations and providing training. The NIGC will implement two strategies described below to achieve this objective.

Strategies:

- Continue to educate by offering information technology courses; and
- Provide information technology vulnerability assessments (ITVA) at tribal gaming operations.

Performance Measures
<ul style="list-style-type: none">• Number of training events held annually related to information technology;• Number of ITVAs conducted annually.

Objective 3.3: Strengthen information and communication systems to support timely decision making and the dissemination of information to all Agency staff.

Improving and expanding on internal communications allows a platform for agency employees to collaborate and share information across the agency, between regional and satellite offices and headquarters. The NIGC will implement four strategies described below to achieve this objective.

Strategies:

- Ensure consistency in services by improving communication and customer service with agency staff;
- Develop and maintain appropriate records management procedures and tools;
- Develop and maintain the tools and technology required to effectively, efficiently, and securely disseminate data and information internally; and
- Improve employee intranet to provide timely information to agency staff.

Performance Measures
<ul style="list-style-type: none">• Percentage of employees who are “satisfied” with information technology services and systems through evaluations.• Increase number of resolutions resolved on Agency technology related issues• Develop appropriate records management procedures and tools.

Objective 3.4: Maintain the internal technology infrastructure and continuity of technology services.

The NIGC is committed to using modern tools to improve efficiencies throughout the agency by exploring new technologies and improving the current infrastructure. The NIGC will replace any outdated and time-consuming applications. If our applications and systems are not functioning properly then our employee performance decreases. We must maintain a strong internal technology infrastructure to provide reliable and high-quality services. The NIGC will implement four strategies described below to achieve this objective.

Strategies:

- Increase process automation;
- Expand the use of agency information technology to improve service and increase efficiency;
- Assess agency applications for value and use; and
- Operate an effective secure network.

Performance Measures
<ul style="list-style-type: none">• Number of data outages annually.• Cost of information technology services and transactions.

Rural Outreach

Strategic Goal 4: Rural Outreach – Develop and execute a plan for small rural gaming tribes that reviews training, technical assistance and regulations

The NIGC is focused on developing an effective rural outreach plan to reach small rural gaming tribes. NIGC outreach to these tribal gaming operations supports the purpose of the IGRA to protect tribal self-sufficiency and the integrity of the gaming industry. Small rural gaming operations provide important revenue and jobs in areas that may have no other, or limited, opportunities to grow an economy.

We will work to deliver a more responsive program to small rural gaming tribes. Specifically, we will focus on improving targeted services and strengthening policy development. This will be achieved by the following: (1) increasing engagement and outreach with small rural gaming tribes through training and technical assistance; and (2) reviewing regulations to determine whether they are overly burdensome to smaller operations.

Objective 4.1: Increase engagement and outreach through agency training and technical assistance for the unique circumstances of small rural gaming tribes.

NIGC training and technical assistance needs may be different for larger tribal gaming operations than for smaller rural gaming tribes. The NIGC will review its current data to determine whether there are regulatory issues that may be more prevalent with smaller rural gaming operations and develop and undertake new technical assistance methods and trainings that meet the needs of smaller rural gaming tribes. The NIGC will implement two strategies described below to achieve this objective.

Strategies:

- Support demonstration or pilot projects for improving how training and technical assistance is delivered to small rural gaming tribes; and
- Review data from the Agency to determine whether new training and technical assistance can better meet the unique needs of smaller rural gaming tribes.

Performance Measures

- Number and types of training developed for the unique circumstances of rural gaming tribes.
- Number and types of technical assistance developed for the unique circumstances of rural gaming tribes.

Objective 4.1: Review regulations to determine whether they are overly burdensome to smaller operations.

NIGC has historically taken into account the needs and capabilities of smaller gaming operations through its regulations. For example, NIGC’s regulations for Minimum Internal Control Standards and accounting requirements differ between Tier A facilities that earn less than \$8 million; Tier B facilities that earn between \$8-15 million; and Tier C facilities that earn over \$15 million. Further, annual gross gaming revenue highlights that the majority of tribal gaming operations throughout Indian Country are smaller facilities with lower gross gaming revenue. Therefore, the NIGC must consistently review its regulations to determine whether smaller operations are overly burdened. The NIGC will implement the following two strategies to achieve this objective:

Strategies:

- NIGC staff will make recommendations to the Commission regarding whether there are regulations that overburden smaller operations, or whether other corrective actions are required to support smaller rural tribes.
- The Commission shall consult with tribes regarding any potential change to the regulations to support smaller rural operations.
- The Commission shall institute other corrective action as needed to support rural outreach.

Performance Measures

- Annual recommendations to the Commission regarding potential regulations that may overburden smaller operations.
- Number of regulatory changes or other corrective action, if any, advised by the Commission to tribes.
- Number of consultations with tribes regarding regulatory changes.

Operational Excellence

Strategic Goal 5: Operational Excellence – Deliver appropriate resources, solutions, and services in an efficient and effective manner to benefit stakeholders

The NIGC is focused on improving agency operational efficiencies. By having effective and efficient internal operations, it provides the basis for success in achieving the strategic goals and objectives. This means developing, maintaining, and improving the policies and procedures that are in place to ensure that the NIGC has the resources it needs and uses those resources to provide the best solutions and services. This is achieved by the following: (1) monitor employee work effectively to provide superior service and to promote continuous improvements to routine processes and services; and (2) increase transparency and accountability in financial management for the Agency.

Objective 5.1: Monitor employee work effectively to provide superior service and to promote continuous improvements to routine processes and services.

NIGC employees strive to provide superior service by delivering information to our stakeholders in an efficient manner. Our employees are committed to providing high quality and robust decisions. To enhance these processes, we must hold employees accountable and provide timely and effective feedback. The NIGC will implement six strategies described below to achieve this objective.

Strategies:

- Provide feedback to employees during work processes;
- Provide support by supervisors and managers to manage workload;
- Simplify processes and procedures for operational improvement by removing duplicative tasks or unnecessary steps;
- Develop evidence-based decision making;
- Initiate an annual review of agency policies and procedures for updates as necessary; and
- Develop a training/mentoring program for new employees to enhance employee skills and efficiency.

Performance Measures
<ul style="list-style-type: none">• Percentage of employees who received training on new and updated policies and procedures and job specific training.

- Develop evaluation techniques for employees based on the objective.

Objective 5.2: Increase transparency and accountability in financial management for the Agency.

The NIGC continues to effectively and efficiently manage its financial resources through the use of a secondary accounting system in addition to the outsourced accounting function. Currently, the secondary accounting system supplements the main system but has limited functionality. Both systems are necessary to provide an accurate budget and financial reports. Improving effectiveness and efficiency of financial and project management are essential to delivering mission critical activities and services on time and within budget. Providing timely budget and financial reports to senior leadership ensures better decision-making. The NIGC will implement five strategies described below to achieve this objective.

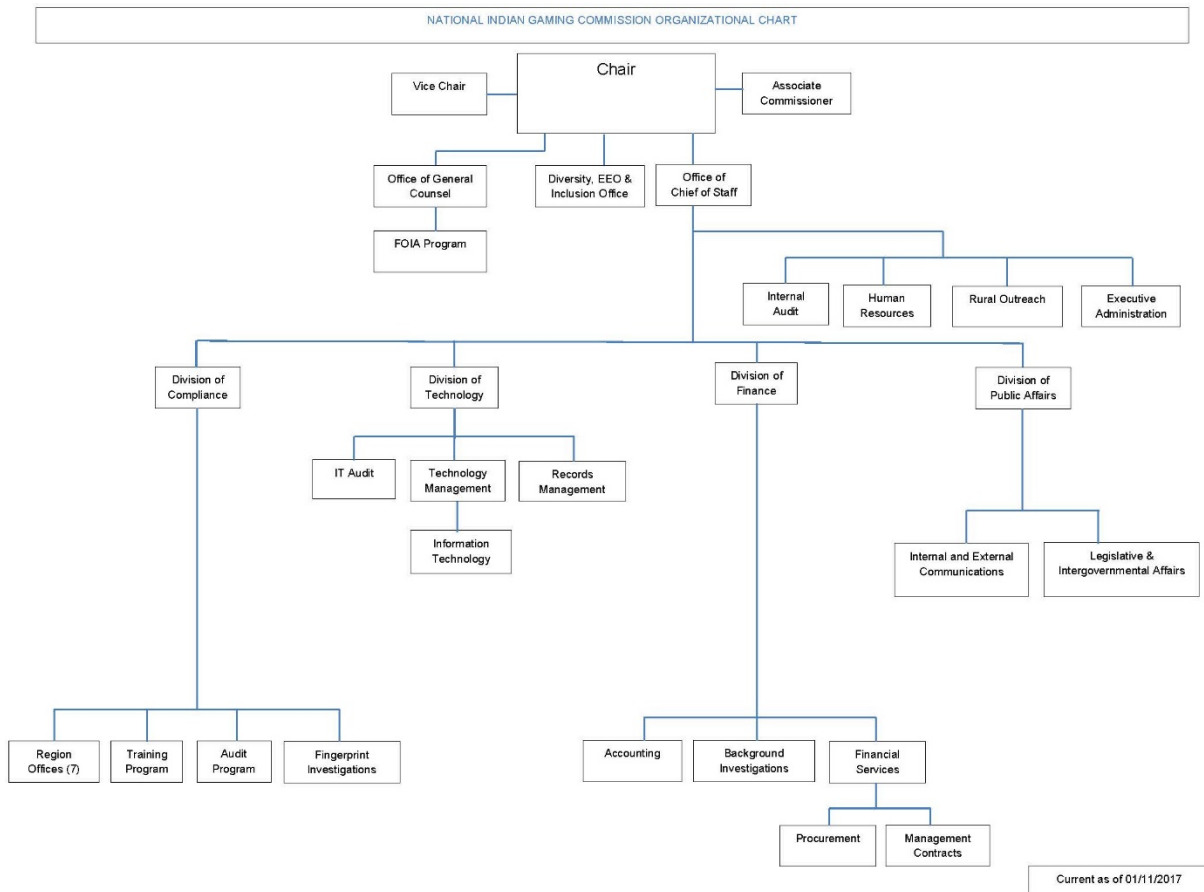
Strategies:

- Effectively allocate and prioritize resources by improving the budget formulation process and document this process;
- Ensure efficient and effective management of financial resources through a balanced budget;
- Seek out and identify opportunities to share information about the Agency's financial resources with tribes and obtain tribal input on this information where it could improve efficiencies;
- Improve the reliability of the secondary accounting system; and
- Provide a budget to all managers and compare budgeted to actual.

Performance Measures

- Percentage of targets met on annual budget calendar timeframe.
- Percentage of financial monthly and quarterly account reconciliations met for accuracy in financial reports.
- Percentage of financial reports delivered on time.
- Length of time to respond to written requests for corrections or adjustments to customer statements for accuracy in reported balances.
- Annually inform tribes of Agency financial resources (Gross Gaming Revenue, Agency Budget, etc.).
- Increase opportunities for tribes to engage and collaborate with the Agency regarding Agency financial resources.

Appendix A: Organizational Chart



Appendix B: Operating Divisions & Their Functions

The Office of General Counsel provides legal advice and counsel to the Commission on all matters relating to IGRA and Commission compliance with all applicable laws and regulations.

The Office of the Chief of Staff implements the policies of the Commission and is responsible for the direction, supervision, and evaluation of the work of employees within the office. This office oversees human resources, internal audit, executive administration and rural outreach. This office is also comprised of four divisions including the Division of Public Affairs, Division of Finance, Division of Technology, and the Division of Compliance.

- **The Division of Public Affairs** provides tribes, tribal regulators, Congress, the public and other stakeholders with clear and accurate information about the Agency's programs and activities. The Division is responsible for planning, coordinating and managing the Agency's media relations, community engagement, legislative affairs programs and inter-governmental communications, which increases understanding about Indian gaming and the Agency's initiatives to achieve compliance.
- **The Division of Finance** provides fiscal management and supports the Agency's day-to-day financial activities. This Division collects fees for Class II and Class III gaming; processes tribal background investigations; conducts management contract review and background investigation for third-party contractors that are managing gaming operations; processes fingerprint and background investigations payments; prepares annual budget and financial reports; prepares annual Gross Gaming Revenue information release; supports the Agency's accounts payable and procurement activities; and handles human resource and personnel management matters.
- **The Division of Technology** provides information technology services; records management; and technology support to all Agency employees and provides technical assistance and training; background and licensing; fingerprint processing; and information technology vulnerability assessments to tribes.
- **The Division of Compliance** provides technical assistance and training; conducts site visits; performs investigations; conducts internal control assessments (ICA); compiles the yearly Gross Gaming Revenue figures; reviews the submitted audited financial statements; and reviews the agreed-upon procedures (AUP) reports to monitor compliance of tribal gaming operations with IGRA. This Division consists of seven regional offices and two satellite offices. The audit and training programs reside within this division.

Appendix C: NIGC Offices

NIGC has 7 Regional offices including Headquarters in Washington, DC

