

# NATIONAL INDIAN GAMING COMMISSION

## STRATEGIC PLAN FOR FISCAL YEARS 2022-2026



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## Message from the Chairman

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I am pleased to present the National Indian Gaming Commission's 2022-2026 Strategic Plan. The Plan sets out the Agency's goals and measures by which it will assess its success. The Agency prepared the Strategic Plan pursuant to the Government Performance and Results Act of 1993, and in consultation with tribal governments. This Strategic Plan supersedes the Fiscal Years 2018-2022 plan.

The Agency will continue to strengthen its role in the regulatory community. This requires the Agency to focus on its unique responsibilities in the industry's regulatory framework as articulated by its statutory mission. Enhancing Agency expertise by fostering relationships with other regulatory bodies and tribal partners will help ensure the Agency's future resilience; as will an Agency focus on diplomatic, and accountable decision making. Such decision-making encourages forward-looking planning processes and provides the public with greater insight into the Agency's work. It also upholds the Agency's intergovernmental obligations which honors tribes' governmental authority and supports tribal economies.

This Plan was informed by significant trends. A hallmark of the Indian gaming industry has been its ability to innovate and grow. An influx of new technologies and gaming formats in recent years presents opportunities for potential industry growth. This growth would continue to benefit from the Agency's engagement with industry and other federal agencies when engagement provides certainty and promotes a shared commitment to a well-regulated industry. In addition, the insights from the global pandemic will remain relevant. These insights build on the regulatory community's role in



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managing risk when meeting the obligations to protect public health and safety and ensure the continuity of sound regulatory operations at all levels. The Agency's insights also include efficient and cost-effective approaches in order to maintain the NIGC's operations. Sustainable Agency operations help to grow tribes' self-sufficiency, regulatory capacity, and tribal economies; and require a commitment to good governance practices, a well-trained federal workforce, and appropriate Agency presence.

The NIGC's strategic plan is an important tool to support the Agency's success in carrying out its statutory responsibilities and it serves as a tool for transparency as the Agency sets forth priorities and initiatives. The Strategic Plan for Fiscal Years 2022-2026 emphasizes four areas for the Agency's work. The Plan focuses on support for industry integrity; efforts around Agency accountability; the regulatory community's commitment to preparedness; and innovation in the Agency's outreach and collaboration. Please feel free to share your comments at [www.NIGC.gov](http://www.NIGC.gov).

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## 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 agency within the Department of the Interior (DOI). 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 provides a legal framework structured to safeguard tribes as the primary beneficiaries of their gaming operations, shield Indian gaming from corrupting influences, and ensure that the games offered are fair and honest. IGRA created the NIGC to protect tribal gaming as a means of generating revenue for tribal governance and tribal communities.

NIGC seeks compliance with IGRA, NIGC regulations and tribal gaming ordinances. 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 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.

The NIGC fulfills its responsibilities under IGRA by:

- regulating and monitoring certain aspects of Indian gaming;
- coordinating its regulatory responsibilities with tribal regulatory agencies through the review and approval of tribal gaming ordinances and management agreements;
- reviewing the backgrounds of individuals and entities to ensure the suitability of those seeking to manage Indian gaming;
- overseeing and reviewing the conduct and regulation of Indian gaming operations;
- providing relevant technical assistance and training;
- referring criminal matters to appropriate tribal, Federal and state entities; and
- undertaking enforcement actions for violations of IGRA, NIGC regulations, and tribal gaming ordinances, including imposing appropriate sanctions for such violations, which may include civil penalties and orders for temporary closure.

As the NIGC fulfills these responsibilities, the Agency closely reviews any indications of corrupting influences that may jeopardize the integrity of tribal gaming.

The NIGC provides Federal oversight to over 520 tribally owned, operated, or licensed gaming establishments operating in 29 states.



## **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. 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 is composed of the Office of the Chief of Staff and the Office of General Counsel with approximately 100 full-time employees at the Commission's headquarters in Washington, D.C., and at eight regional 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.

## **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 emphasis areas.

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 2018 – 2022.

## Consultation Efforts

The NIGC incorporated the more specific consultation requirements set forth in the GPRA Modernization Act of 2010. The NIGC recognizes the requirements set forth in Executive Order 13175 for Consultation, and although it does not apply to the NIGC, the NIGC does have a Consultation Policy that requires meaningful and timely input by Tribal officials for regulatory policy changes. Due to the consultation requirements set forth in the GPRA Modernization Act of 2010 and the NIGC Consultation Policy, the NIGC engaged the public by posting the draft strategic plan for comment to the NIGC website (<https://www.nigc.gov/commission/strategic-plan>) and sent e-mail notices to tribal government leaders of the availability of the draft plan. The NIGC also conducted consultation with tribal partners and submitted the plan for input to the Office of Management and Budget. All comments received were considered when finalizing the strategic plan.

## Strategic Plan Framework

The NIGC Strategic Plan FY 2022 – 2026 includes four strategic goals:

- **Goal 1: Industry Integrity** – Protecting the valuable tool of Indian gaming that in many communities creates jobs, is the lifeblood for tribal programs, and creates opportunities for tribes to explore and strengthen relationships with neighboring jurisdictions by ensuring the industry's integrity.
- **Goal 2: Preparedness** – Promoting tribes' capacity to plan for risks to tribal gaming assets including man-made disaster threats, pandemics, natural disaster threats, the need to modernize and enhance regulatory and gaming operation workforces, or public health and safety emergencies.
- **Goal 3: Outreach** – Cultivating opportunities for outreach to ensure well-informed Indian gaming policy development through collaborative and diverse relationships, accessible resources, and government-to-government consultation.
- **Goal 4: Agency Accountability** – Meeting the tribes' and public's expectation for administrative processes that uphold good governance practices and support efficient and effective decision making to protect tribal assets.

These four strategic goals focus primarily on the emphasis areas of the NIGC and articulate the Commission's priorities. The associated objectives are mission- and management-focused in

achieving these goals. The strategies that identify actions that will be taken for accomplishing the goals are presented within each objective. 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 each strategic goal.

## External Risk Factors

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

- An important element of the Commission's vision is that Indian tribes are the primary beneficiaries of gaming revenues. These revenues have played a vital role in the economic development of Indian tribes. 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. To take certain regulatory actions, the Commission can act only if there is a quorum of two Commissioners. The sudden and unexpected departure of one or two Commissioners would paralyze the Commission until such time that new Commissioners are appointed.
- The Commission is a very small agency, with approximately 100 full-time employees. Extensive litigation against the Commission would result in a shift of limited agency resources, normally used to perform its normal regulatory oversight functions (e.g., reviews of management contracts and tribal gaming ordinances, drafting of Indian land opinions, etc.) to instead perform litigation defense work.
- As a result of the decision in *Colorado River Indian Tribes v. National Indian Gaming Commission*, 466 F.3d 134 (D.C. Cir. 2006), the Commission lacks the authority to prescribe minimum internal control standards for most class III gaming activities, and the Commission is prevented 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 or documentation, the Commission may be inhibited in its ability to make timely determinations. 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 could 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. This places a greater Class II compliance oversight burden on the Commission.

- Events, such as the COVID pandemic and unforeseen events, that impact the Commission's ability to collect fees that may limit the ability to provide appropriate resources to carry out statutory requirements. The COVID pandemic closed many Tribal gaming operations, which had a direct impact on gross gaming revenues that are used to calculate fees collected by the NIGC. It is expected that this is only a temporary setback as Tribal gaming operations have created protocols and policies in place to re-open from the COVID pandemic. The NIGC during this time took measures to handle the COVID pandemic including its availability to carry out its statutory requirements, such as an increase in online training events and online conferences/meetings with Tribal officials.

## 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.

## Industry Integrity

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**Strategic Goal 1: Industry Integrity** – protect the valuable tool of Indian gaming that, in many communities, creates jobs, is the lifeblood for tribal programs, and creates opportunities for tribes to explore and strengthen relationships with neighboring jurisdictions by ensuring the industry's integrity.

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**Objective 1.1:** Enhance awareness of actions that lead to IGRA Violations issues for all stakeholders in Indian gaming.

The purpose of IGRA is to shield gaming by an Indian tribe from organized crime and other corrupting influences, to ensure that the Indian tribe is the primary beneficiary of the gaming operation, and to assure that gaming is conducted fairly and honestly by both the operator and players. When tribes comply with IGRA, these purposes are met and the integrity of the industry is maintained. The NIGC aims to work, from outreach and education to investigation and enforcement, with tribal governments and regulatory partners to ensure compliance and maintain industry integrity. This requires strong partnerships within the Indian gaming industry to ensure that the NIGC continues to monitor the industry effectively. The NIGC will implement three strategies described below to achieve this objective.

Strategies:

- Ensure stakeholders receive coordinated and consistent information on what constitutes a violation of IGRA.
- Build partnerships within the Indian gaming industry through a team approach to identify common actions that lead to IGRA Violations.
- Meet with tribal leadership, regulators, and operators to encourage technical assistance (“TA”) requests and use of the OGC Declination Process.

Performance measures:

- Number of outreach efforts in which NIGC Leadership and Staff discuss elements of IGRA violation with Tribal partners (yearly total hours: TA interactions, Region Site Visit (“RSV”) and Site-Specific Training (“SST”) training as outreach efforts)
- Number of collaborations between NIGC Leadership and Staff with Industry experts and organizations (yearly total invitations to participate on panels, region meetings with industry experts, and meeting with industry stakeholders)
- Number of national, regional and individual meetings and training events to engage tribal leaders and regulatory community.
- Number of events and meetings with respect to awareness actions that lead to IGRA violations.

**Objective 1.2:** Improve stakeholders’ ability to detect the occurrence of IGRA violations.

Ensuring compliance with gaming laws and regulations is essential to maintaining the integrity in the Indian gaming industry. The NIGC will implement five strategies described below to achieve this objective.

Strategies:

- Create new and/or update existing training courses to improve stakeholders’ ability to identify and prevent IGRA violations.
- Create new and improve existing tools and technology used to identify common actions that lead to IGRA Violations.
- Maintain and staff the OGC Declination Process utilized by tribes in draft agreements and contracts.
- Develop and maintain a collection and analysis of data related to IGRA Violations to provide decision-makers with current and relevant risk and trend information.
- Increase education and outreach opportunities related to addressing and preventing IGRA violations.
- Identify and utilize all resources available from NIGC to detect and prevent IGRA Violations.

Performance measures:

- Number of new training courses created specific to IGRA violations.
- Number of existing training courses updated specific to IGRA violations.

- Number of training courses presented specific to IGRA violations.
- Number of attendees for each type of training course offered and for each course.
- Type and number of actions taken by NIGC for IGRA violations identified.
- Number of collaborative efforts by staff to update training courses.

**Objective 1.3:** Prevent, identify, disrupt and/or eliminate ongoing IGRA violations by utilizing the NIGC's enforcement authority and pre-enforcement actions to ensure that the 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, when practical, 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 were 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 in some situations. The NIGC will implement eight strategies described below to achieve this objective.

#### Strategies:

- Maintain effective, efficient, consistent, and risk-informed oversight of licensing for key employee and primary management officials of tribal gaming enterprises.
- Conduct effective and efficient inspections, audits, as well as follow-up reviews, investigations, and enforcement as needed, to ensure that tribal gaming is conducted in compliance with NIGC and tribal regulatory requirements.
- Proactively solicit and efficiently review unexecuted gaming related contracts and agreements to identify, prevent and address potential IGRA and NIGC regulation violations.
- Analyze audited financial statements and AUP reports submitted for potential violations or conditions that create a risk of an IGRA violation.
- Develop and maintain strong working relationships with tribal regulators.
- Implement and enforce Indian gaming laws consistently and investigate and take actions to address potential violations of Indian gaming laws.
- Conduct analysis to determine high risk areas and develop, and deliver training to educate and prevent recurring findings.

#### Performance Measures:

- Number of fingerprint based criminal history reports requested and disseminated to tribal regulators to help determine a gaming licensee's eligibility.

- Number of key employee/primary management official licensing submissions received, reviewed and processed, to include total number of objections issued.
- Number of site visits conducted annually, the number of potential IGRA violations identified, and the method used to remedy the findings.
- Number of Internal Control Assessments (ICA), Internal Audit Reviews (IAR), GAAP Reviews (GAR) and NIGC Fee Reviews (NFR) conducted annually to identify risk and potential IGRA violations, to include the annual remediation rate of any issues identified.
- Number of Investigative Audit (IVAs) completed annually, to include issues identified and results.
- Number of audited and reviewed financial statements analyzed annually, to include a number of potential IGRA violations and manner in which they were resolved.
- Number of potential violations or conditions that create a high risk of non-compliance with federal regulations.
- Number of outreach efforts with Tribal Leaders and Tribal Gaming Regulatory Authority (TGRA) to develop and maintain a strong working relationship with tribal leaders and regulators. (add outreach to TA spreadsheet and report totals at year-end)
- Number of technical assistance inquiries submitted by stakeholders seeking clarification or acknowledgment related to the stakeholders' understanding or implementation of IGRA requirements.
- Number of contracts and agreements submitted, reviewed, resolved, or referred through the OGC Declination Process.
- Number of Letters of Concern issued and resolved, to include manner of resolution.
- Number of IGRA violations reported by external parties and the manner of resolution.
- Number of risk-based training annually to educate and prevent recurring findings.

## Preparedness

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**Strategic Goal 2: Preparedness** – Promoting tribes' capacity to plan for risks to tribal gaming assets including man-made disaster threats, pandemics, natural disaster threats, the need to modernize and enhance regulatory and gaming operation workforces, or public health and safety emergencies.

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**Objective 2.1:** Provide current and up to date training and resources to improve stakeholder's awareness and understanding of preparedness for risks to tribal gaming assets, the laws and regulations designed to foster this preparedness by ensuring tribes have the most current information, and how to tribes' can locate preparedness resources.

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

Strategies:

- Conduct training events to provide for a consistent policy approach.
- 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 maintaining a highly effective workforce.
- Strengthen the impact and effectiveness of training by fostering best practices, facilitating partnerships, and identifying gaps in training.
- Foster and develop relationships with other Federal Partners, Tribal Regulatory Partners and Non-Governmental Organizations, in the delivery of trainings where the aforementioned groups provide subject matter expertise.
- Analyze trainings provided through the use of both formal and informal methods to measure the effectiveness of trainings provided

Performance Measure:

- Number of training events conducted, number and type of specific training course conducted, attendance by event and course.
- Number of training courses developed, revised, and, to include information on staff and external partners responsible for development and delivery.
- Number, type and duration of professional development course completed by agency staff.
- Number, type, and occasions of use of training courses available through NIGC resources for download or viewing.

**Objective 2.2:** Keep informed about developments in gaming, including best practices and emerging trends, utilize the knowledge to raise awareness of these developments.

The NIGC is committed to making the best use of our resources and assisting our stakeholders in providing information on industry trends and best practices. We will conduct research, data collection, 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 three strategies described below to achieve this objective.

Strategies:

- Research industry trends and best practices.
- Identify or develop agency staff subject matter experts.
- Disseminate information to tribes, tribal regulators and operators.

Performance Measures:

- Number of professional development training opportunities NIGC subject matter experts participated in to enhance specialized skills to maintain subject matter expertise.
- Number of NIGC internal information sharing meetings.
- Number of external meetings or engagement disseminating preparedness resources.
- Number of events, meetings or other engagement by NIGC and industry experts to discuss developments in gaming, best practices and emerging trends.

**Objective 2.3:** Support and ensure tribe's construction and maintenance of the gaming facility, and the operation of that gaming is conducted in a manner which adequately protects the environment and the public health and safety.

The NIGC is committed to Environment, Public Health, and Safety (EPHS) efforts of tribes. The NIGC will verify on an ongoing basis that gaming facilities are constructed and operated in a manner the adequately protects the environment, public health and safety in accordance with IGRA, NIGC regulations and approved tribal gaming ordinances and ensure tribal monitoring and licensing protocols are adequate to support the issuance of new or renewed licenses. The NIGC will implement three strategies described below to achieve this objective.

Strategies:

- Ensure tribes comply with facility license submissions and attestations.
- Provide technical assistance to tribes for the development or improvement of tribal protocols related to public health and safety.
- Act swiftly to educate and support tribes and pursue enforcement actions when necessary, when the environment or public health and safety are at risk due to conditions developing or ongoing at a tribally licensed gaming facility.

Performance Measures:

- Number of facility license submissions made that were on time and complete.
- The number of EPHS resources developed and deployed.
- Number of training and technical assistance provided.
- Number of actions taken by NIGC to address potential EPHS concerns or violations.

**Objective 2.4:** Support tribe's preparedness to identify, protect, detect, respond and recover from Cybersecurity threats and attacks.

The NIGC works to educate gaming tribes with the knowledge, tools, and capabilities that may be needed to maintain or improve their cybersecurity posture. The NIGC continues to develop a variety of tools that provide targeted and meaningful technical assistance and information sharing to gaming tribes. The NIGC will implement two strategies described below to achieve this objective.

Strategies:



- Provide onsite or site specific technical assistance to identify and mitigate cybersecurity weaknesses or potential threats.
- Establish and maintain a cybersecurity task force or working group responsible for making recommendations to the Commission regarding cybersecurity and for the development of cyber security response protocol.

Performance Measures:

- Number of Information Technology Vulnerability Assessments (ITVA) requested, completed, to include the number of vulnerabilities identified.
- Number of tribal-related cybersecurity attacks reported, responded to and their outcomes.
- Number and type of Tech Alerts and Bulletins issued by the agency.
- Number of trainings and resources provided.
- Number and type of recommendations to the Commission by the cybersecurity task force.
- Number of and type of actions taken to modernize NIGC regulations.

## Outreach

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**Strategic Goal 3: Outreach** – Cultivating opportunities for outreach to ensure well-informed Indian gaming policy development through collaborative and diverse relationships, accessible resources, and government-to-government consultation

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**Objective 3.1:** Enhance relationships and increase engagement with gaming tribes.

The NIGC works to reach out to gaming tribes with the knowledge, tools, and capabilities that may be needed to make better informed decisions. The NIGC is developing a variety of tools that provide targeted and meaningful technical assistance and information sharing to gaming tribes. The NIGC will implement three strategies described below to achieve this objective.

Strategies:

- Increase engagement between the agency and gaming tribes.
- Expand access to training and technical assistance for gaming tribes.
- Increase targeted outreach activities and digital training materials in order to engage gaming tribes.

Performance Measures:

- Percent change (increase or decreases) in attendance of NIGC training events and courses, with a comparison to the previous year.
- Number of virtual training events conducted, topics and attendance.
- Number of in-person training events conducted, topics and attendance.
- Number of site-specific training events conducted, topic and attendance.
- Number of digital/on-line training materials available, topic and downloads or attendance.
- Number and manner of invitations issued to stakeholders per event compared to attendance.
- Number of documented outreach methods, areas of improvement identified and new outreach methods developed.

**Objective 3.2:** Review agency training, technical assistance and regulations to foster improved outreach.

The NIGC conducts outreach activities through various channels, such as issuing bulletins targeted to the Indian gaming industry; providing training events throughout the Agency's regional office coverage; delivering speeches and presentations on Indian gaming and updates; and participating in meetings and discussions with tribal governments, tribal regulators, and operators. The NIGC has taken steps to upgrade and enhance its website to better meet the needs of our stakeholders and to allow more access to the NIGC's tools and resources. In order to provide better outreach and to provide timely and useful information, the NIGC will expand its outreach efforts. The NIGC will implement three strategies described below to achieve this objective.

**Strategies:**

- Conduct a study of the agency's regulations.
- Support demonstration or pilot projects for improving outreach to gaming tribes.
- Strengthen stakeholder outreach.

**Performance measures:**

- Number of agency regulations identified for amendment and number amended following tribal consultation.
- Number of new training courses created.
- Number of existing training courses updated.
- Number of training courses presented.
- Number of attendees for each type of training course offered and for each course.
- Number of Technical Assistance events outside of scheduled training to include tribe, topic, staff, time, and outcome.
- Number of NIGC staff involved in presenting training and resource material.

## Agency Accountability

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**Strategic Goal 4: Agency Accountability** – Meeting the tribes’ and public’s expectation for administrative processes that uphold good governance practices and support efficient and effective decision making to protect tribal assets.

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**Objective 4.1:** Monitor employee work to provide superior service and to promote continuous improvements to routine processes and services.

NIGC employees must strive to provide superior service by delivering information to our stakeholders in an efficient manner. Our employees are committed to providing high-quality accurate decisions. To enhance these processes, we must hold employees accountable and provide timely and effective feedback. We must provide opportunities for employees to learn, develop, and grow, so that talents are supported and utilized. 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 employee workload.
- Simplify processes and procedures for operational improvement by removing duplicative tasks or unnecessary steps.
- Use evidence-based decision-making.
- Initiate an annual review of agency policies and procedures for updates as necessary.
- Develop a training/mentoring program for new and current employees to enhance employee skills and efficiency.
- Gather workforce data, such as that provided under the Federal Employee Viewpoint Survey (FEVS) to plan for change by analyzing the data.
- Engage the workforce in regular listening sessions to obtain data on implementation and feedback on continuous improvements to decision-making processes.

Performance Measures:

- Number of quarterly or mid-year reviews conducted by established deadlines compared to previous year.
- Number of instances where workload was adjusted to better accommodate the needs of staff.
- Number and type of duplicative efforts identified and removed.
- Number of policies/procedures/protocol identified for annual review, the number reviewed, number amended, number of new policies created, and the number approved.
- Number of new employees who completed new hire training and the average evaluation rating given to the program by the attendee.
- Number of employees who completed professional development and required training.

- Number employee engagement opportunities provided.
- Number positive changes made to improve FEVS responses.

**Objective 4.2:** 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 four 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.
- Continue to improve the reliability of the secondary accounting system.
- Continue to provide a budget to all managers and compare budgeted to actual.

Performance Measures:

- Number of program budgets reviewed to track the ratio of budgeted to actual expense to determine if budgets are effectively allocated.
- Number of engagements where NIGC shares information about the Agency's financial resources with tribes and obtain tribal input on this information where it could improve efficiencies;
- Number of annual communications to inform tribes of Agency financial resources (Gross Gaming Revenue and Agency Budget).
- Number of annual budgets submitted by deadlines.
- Number of budget procedures identified and updated for improved uniformity.

**Objective 4.3:** 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 with agency staff.
- Continue to strengthen collaborations between internal operations to ensure tribes have adequate guidance and technical assistance.
- Develop and maintain the tools and technology required to effectively, efficiently, and securely disseminate data and information internally.
- Improve employee intranet to provide timely information to agency staff.

Performance Measures:

- Number of routine, weekly and/or monthly internal collaboration meetings.
- Number of intranet improvement meetings attended and provide comments for improvement.
- Number of Intranet updates completed weekly and reminder emails sent to all staff reinforcing availability of information in a timely manner.
- Percentage of staff with access to communication platforms (e.g. email, intranet, Microsoft Teams, etc).
- Number of connection issues are identified, and attempt at correction is made within 24 hours.

**Objective 4.4:** Strengthen agency provided technology and infrastructure services to improve overall operational efficiencies throughout the agency.

The NIGC is committed to using modern tools to improve efficiencies throughout the agency by leveraging new technologies and improving agency IT operations and delivery of IT infrastructure services. The NIGC continuously works to identify and replace legacy systems and applications. Applications and systems no longer providing efficient mission-enabling services or approaching end of life become a liability for the agency resulting in a decrease in employee productivity and agency output. The need for secure, high performing and reliable internal technology infrastructure services is critical in enabling the agency to support its mission. The NIGC will implement four strategies described below to achieve this objective.

Strategies:

- Focus on leveraging and adopting technologies to increase process automation.
- Expand the use of agency information technology to improve service and increase efficiency.
- Continuously monitor and remediate IT security and operational vulnerabilities
- Assess agency applications for value and use.

Performance Measures:

- Percentage of staff that successfully completed required IT security trainings.
- Annually Inquire with Tribal partners for input and recommendations for efficiency or new technologies. Number of technology processes or applications identified for improvement or suggested implementation.

- Annually, assess repeat tasks involving new technologies implemented and ensure policies reflect current duties and operations.
- Number of unscheduled system outages reported annually.