



National Indian Gaming Commission (NIGC)
U.S. Department of the Interior

*** DRAFT as of 09-11-12 ***
Strategic Plan
For Fiscal Years 2014-2018



Letter from the Chair

I am pleased to share with you the Strategic Plan: 2014 – 2018 of the National Indian Gaming Commission (“NIGC,” “Commission,” or “Agency”). This document outlines the Commission’s goals and measures by which we will assess our success over the next several years. This Strategic Plan replaces the FY 2009 – 2014 Plan.

We must continue to build a stronger, more effective agency. As this document outlines, we will strive to do so in very specific ways. We will strengthen our collaboration with tribal and state governments as well as other Federal agencies to enable effective regulation of Indian gaming. By facilitating tribal participation in the development of the NIGC policies, regulations, and other matters affecting tribes, we will strive to build strong government-to-government relationships, as well as increase effectiveness and efficiency within the NIGC. We will promote tribal self-sufficiency by offering opportunities for tribal governments and tribal gaming operations to continue to increase their proficiency and knowledge through technical assistance and training. We will also continue to review our regulations based on the changing needs and challenges within the Indian gaming community to ensure consistency and an up-to-date regulatory framework. Finally, we will hold ourselves to the highest standards of transparency and accountability, providing the public and tribal governments insight into our processes and decision-making.

The governmental entities regulating Indian gaming have grown along with the industry. In addition to the Commission, there are approximately 256 tribal gaming commissions serving as regulators of their gaming operations. There are also 28 states that provide varying levels of regulatory support to fulfill their responsibilities pursuant to the Indian Gaming Regulatory Act (“IGRA”) and tribal-state compacts. In addition to the NIGC, tribal and state regulatory agencies, the Department of the Interior (“DOI”), the Department of Justice (“DOJ”), the Federal Bureau of Investigation (“FBI”), the Internal Revenue Service and the Department of the Treasury all implement and enforce laws that impact Indian gaming and are used to ensure that tribes are the primary beneficiaries of Indian gaming. The NIGC coordinates with all of these governmental entities to fulfill Congress’ mandates in

IGRA.

The Commission's Strategic Plan for Fiscal Years 2014-2018 focuses primarily on improving coordination and collaboration with other Federal agencies; improving coordination and collaboration with tribes; continuing and expanding tribal consultation; providing training and technical assistance to tribal gaming commissions and operations; conducting ongoing regulatory reviews; finalizing current regulatory revisions; examining and assessing the efficiency and effectiveness of the Commission; and enhancing the NIGC's information-technology infrastructure.

It is my pleasure to submit the NIGC's Strategic Plan. Please feel free to contact us with your comments at www.nigc.gov.

Sincerely,

Tracie Stevens
Chairwoman

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Mission & Organization

Mission

The NIGC's primary mission is to work within the framework created by the Indian Gaming Regulatory Act (IGRA) for the regulation of gaming activities conducted by tribes on Indian lands to fully realize IGRA's goals: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities.

Vision

The Commission's vision is to adhere to the principles of good government, including transparency and agency accountability; to promote fiscal responsibility; to operate with consistency and clarity to ensure fairness in the administration of IGRA; and to respect the capabilities and responsibilities of each sovereign tribal nation in order to fully promote tribal economic development, self-sufficiency and strong tribal governments.

History

IGRA was enacted to support and promote tribal economic development, self-sufficiency and strong tribal governments through the operation of gaming on Indian lands. The Act provides a regulatory framework to shield Indian gaming from corruption, and to ensure that the games offered are fair and honest and that tribes are the primary beneficiaries of gaming operations. The Act created the Commission to protect tribal gaming as a means of generating revenue for tribal communities. IGRA placed the Commission within the Department of the Interior (DOI), but also provided it with independent Federal regulatory authority.

The Commission monitors tribal gaming activity, inspects gaming premises, conducts background investigations and audits of Class II gaming operations (and Class III gaming operations, upon request or as provided by applicable law, such as tribal gaming ordinances and tribal-state compacts). The Commission also provides technical assistance and training to tribal gaming commissions and operations and, when appropriate, undertakes enforcement actions.

The Commission fulfills its responsibilities under IGRA by:

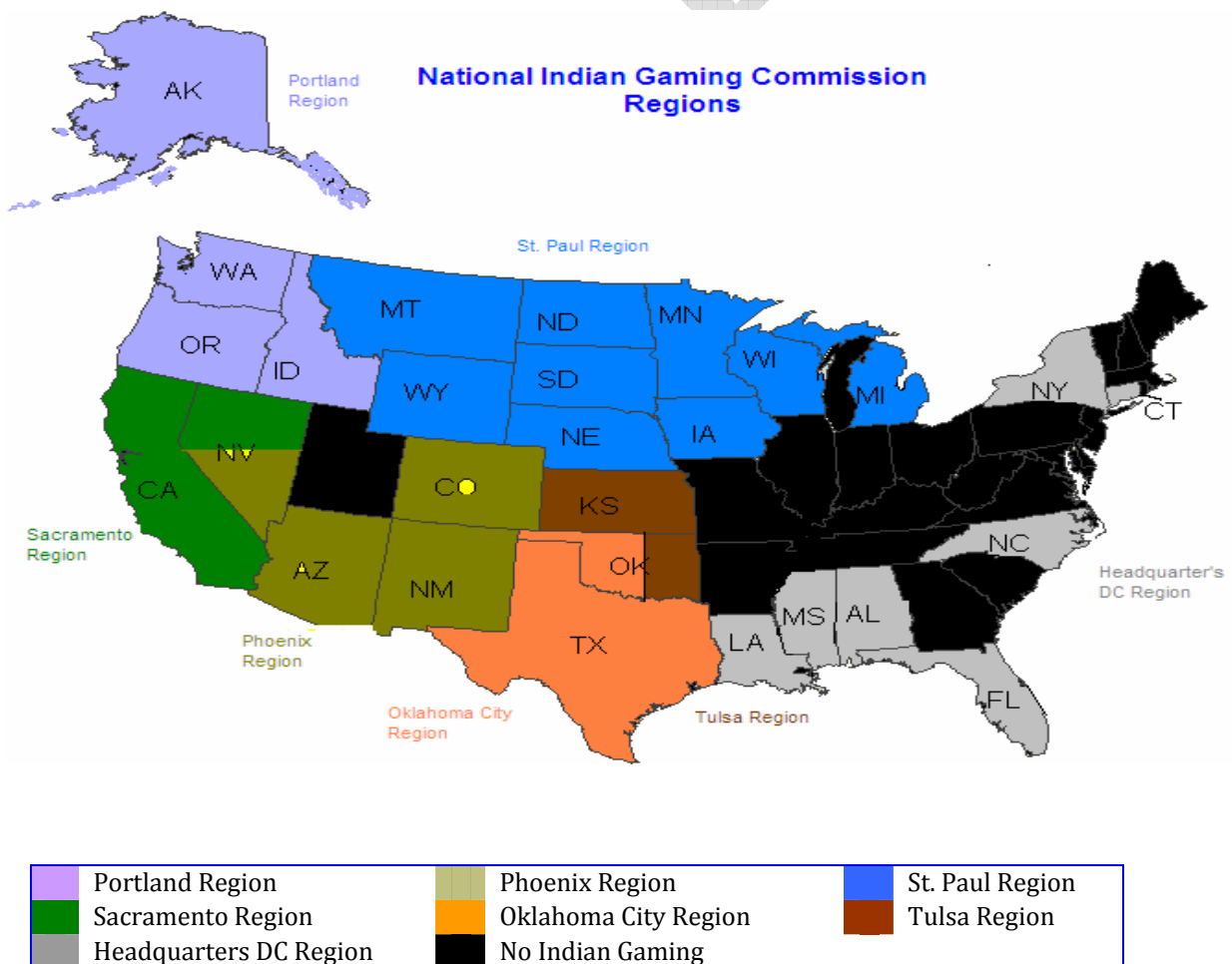
- regulating and monitoring certain aspects of Indian gaming;
- coordinating its regulatory responsibilities with tribal regulatory agencies through the review and approval of tribal gaming ordinances and management agreements;
- reviewing the backgrounds of individuals and entities to ensure the suitability of those seeking to manage or invest in Indian gaming;
- overseeing and reviewing the conduct and regulation of Indian gaming operations;
- referring law enforcement matters to appropriate tribal, Federal and state entities; and

- when necessary, undertaking enforcement actions for violations of IGRA, NIGC's regulations and tribal gaming ordinances, including imposing appropriate sanctions for such violations.

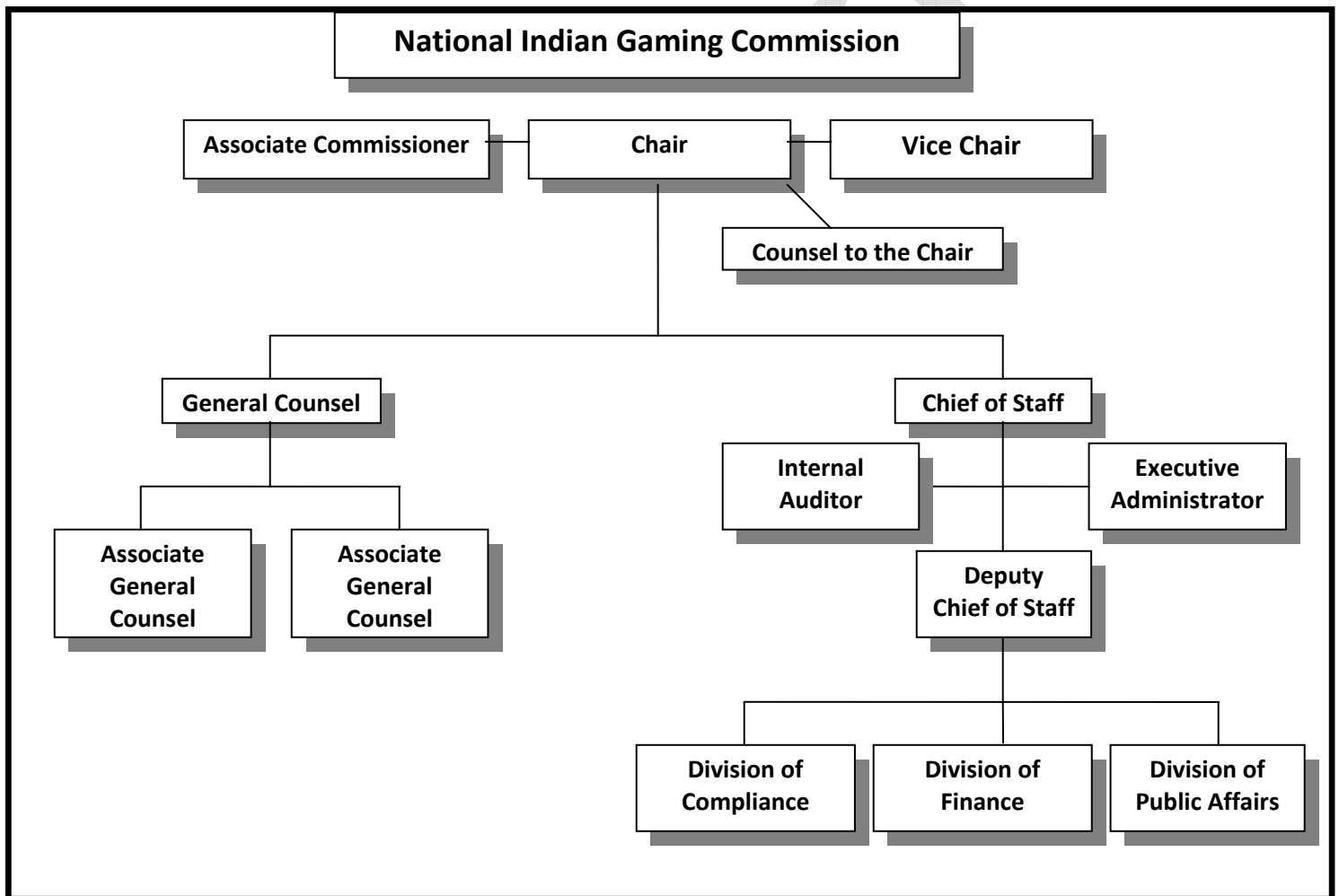
As the Commission fulfills these responsibilities, it pays close attention to any indications of corrupting influences, such as those posed by organized crime and persons known to be attracted to cash-intensive industries, such as gaming.

Commission Structure

The Commission provides Federal oversight to 421 tribally owned, operated or licensed gaming establishments operating in 28 states. The Commission maintains its headquarters in Washington, DC, and has seven regional offices and three satellite offices. The Commission is divided into four separate divisions with a combined staff of over 100 full-time employees, as of 2012. Approximately half of the Commission staff is assigned to headquarters in Washington, DC, with the remaining staff assigned to regional offices located in Portland, OR; Sacramento, CA; Phoenix, AZ; St. Paul, MN; Tulsa, OK; Washington, DC; and Oklahoma City, OK; and satellite offices in Rapid City, SD; Temecula, CA; and Flowood, MS.



The Commission established its field offices to improve the level and quality of services it provides to tribes, and to enhance its ability to communicate, collaborate and interact with tribes located within each office's geographic region. The field offices are vital to carrying out the statutory responsibilities of the Commission. By having auditors and compliance officers close to tribal gaming facilities, the Commission seeks to facilitate compliance with the Act and better relationships with tribal leaders, officials and regulatory personnel. In addition to auditing and investigative activities, the field staff provides technical assistance and training to promote a better understanding of gaming controls within the regulated industry, and to enhance cooperation and compliance to ensure the integrity of gaming operations.



Overview of the FY 2014 – 2018 Plan

Development of the NIGC Strategic Plan is a collaborative effort to ensure that all stakeholders have an opportunity to participate in establishing agency-wide strategies based on the Commission's priorities.

This document provides a concrete basis for establishing strategic goals, and outlines those strategies by which the Agency will achieve those goals. This document will also address how the NIGC will prioritize the allocation of its budgetary, personnel and other resources.

The NIGC Strategic Plan focuses on the four priorities of the Commission and strategies, which are seen as key for agency improvement over the next five years. The Performance and Accountability Report outlined the Commission's four priorities and were included in the NIGC Budget Justification for FY 2013. The Commission identified management and performance priorities in four areas:

- consulting and building relationships with tribal governments;
- providing technical assistance and training;
- continuing its regulatory review; and
- reviewing its internal operations.

Based upon these priorities, the NIGC developed goals and strategies designed to ensure that the NIGC uses its resources to implement, support and monitor the four priorities. All strategies listed here are essential to successful implementation of the NIGC Strategic Plan.

Goals

Strategic goals assert the general direction the agency wants to take to realize its mission and vision. Each goal reflects an area of focus for improving performance across the agency. The NIGC developed the following five goals:

1. Continue the Assistance, Compliance and Enforcement ("ACE") initiative;
2. Improve technical assistance and training for stakeholders;
3. Improve and update the NIGC's regulations;
4. Improve consultation, communication and relationship building with tribal, federal and state regulatory authorities and/or agencies; and
5. Increase efficiency, transparency and accountability.

Strategies

Strategies represent the critical link between planning and implementation. They describe how the agency is going to achieve each goal. The NIGC developed 12 strategies for achieving the goals.

Performance Measures

As the NIGC implements its goals and strategies, it is useful to monitor various performance measures so that the Commission can evaluate progress toward achieving its goals.

As with any agency there are many possible choices that may be used to measure performance. The NIGC will focus on key measures to guide success in achieving the strategic plan goals.

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Goal 1

Continue the Assistance, Compliance and Enforcement (“ACE”) initiative

The basic principle in enforcing IGRA is through ACE: Assistance, Compliance, and Enforcement, in that order. The ACE approach to enforcement is consistent with the NIGC’s priorities. This approach prevents foreseeable problems through effective communication, training and technical assistance, and compliance efforts.

The first step of this initiative is to provide assistance to achieve compliance with IGRA and the NIGC regulations. The Agency will respond to changes in the Indian gaming industry, anticipate the needs of stakeholders regarding such changes, and expand the Agency’s understanding and resources to serve gaming tribes in regard to the changes. The Agency will continue to provide technical assistance and training to tribes to enhance compliance and reduce the potential for future violations. The Agency will work with Tribes to ensure compliance with IGRA by communicating with Tribes early in the process if there is a potential compliance issue and working with Tribes to resolve compliance issues voluntarily so that enforcement action is taken only when necessary.

The NIGC is expanding its public awareness and outreach to gaming tribes through the ACE initiative. The initiative helps connect gaming tribes with a broad array of technical assistance and trainings offered by the NIGC.

Strategy 1

Increase the availability of technical assistance available and provided to tribes, gaming commissions, and gaming operations.

Supporting Performance Measures	2018 Target
Number of voluntary audit technical assistance requests.	1000
Provide tribal gaming commissions with technical assistance needed to continue their success in maintaining compliance with IGRA.	Developing baseline

Strategy 2

Provide timely responses to Tribes on audit findings to allow adequate time for corrective action.

Supporting Performance Measures	2018 Target
Percent compliant with informing, assisting, and providing technical assistance to Tribes within established deadlines.	Developing baseline

Strategy 3

Conduct site visits, audits and evaluations, with particular focus on improvements in tribal internal control systems to maintain the integrity of the gaming industry.

Supporting Performance Measures	2018 Target
Number of audits and evaluations of tribal gaming facilities completed annually.	20
Number of tribal gaming facility site visits completed annually.	Developing baseline
Percent of MICS audit exceptions satisfactorily resolved by tribal gaming operations as a result of an audit or evaluation conducted by the NIGC.	80%

Goal 2

Improve technical assistance and training for stakeholders

In partnership with the Indian gaming industry and other Federal agencies, we will provide technical assistance and training to tribes within all NIGC regions through targeted training events, site visits, and inquiries.

To improve the training program's effectiveness and improve participants' response to trainings offered, the NIGC plans to update and revise course content so that it is immediately applicable and engaging for participants.



Sacramento Regional Training Event

Strategy 1

Provide guidance, technical assistance, training, and other forms of assistance to tribes to build and sustain the capability to prevent, respond to, and recover from weaknesses in internal controls and violations of IGRA and NIGC regulations.

Supporting Performance Measures	2018 Target
Proactively respond to tribal needs and industry changes by modifying course offerings, and methods of providing technical assistance.	Feedback reviewed

Strategy 2

Provide opportunities for tribes located within all NIGC regions to participate in trainings.

Supporting Performance Measures	2018 Target
Number of training events held annually.	80
Increase the number of training opportunities for tribes to attend training events	Developing baseline
Number of site specific technical assistance events provided annually.	Developing baseline

Goal 3

Improve and update the NIGC's regulations

The Agency will continue the regulatory review implemented in 2010, by continuing to improve and update the NIGC's regulations after meaningful consultation with stakeholders.

Strategy 1

Finalize and implement new and revised regulations developed through the regulatory review process

Supporting Performance Measures	2018 Target
Continue to inform Tribes of new regulations through the use of NIGC's website and other media outlets, including social media.	Annually reviewed
Provide adequate training to staff and Tribes to enhance understanding of new and revised regulations.	100%
Conduct ongoing evaluations of regulations to determine the need for regulatory updates and changes.	Annually reviewed

Goal 4

Improve consultation, communication and relationship building with tribal, federal and state regulatory authorities and/or agencies

The Agency will identify methods of communicating information to tribal gaming operators, regulators and government officials that will provide for meaningful, timely and respectful consultations; improve transparency, accountability, collaboration and participation; and continue to enhance and build upon relationships with tribal, Federal and state regulatory authorities and/or agencies.

Communication and other assistance services are integral to the NIGC's support of this strategic goal. The NIGC's processes help ensure services are accurate and responses are timely. The NIGC is also developing surveys and other metrics that will assist in gauging gaming tribes and stakeholders' needs.

Strategy 1

Conduct consultations with tribes on NIGC proposals for regulations, rulemaking, legislation, guidance, policy formulation or actions that may have a substantial, direct effect on one or more tribes, on the relationship between tribes and the Federal government, or on the distribution of power and responsibilities between tribes and the Federal government.

Supporting Performance Measures	2018 Target
Percent of gaming tribes and their officials, and employees attending consultations.	80%
Adoption and full implementation of the NIGC's tribal consultation policy.	By 2014
Conduct tribal consultations in conjunction with national and widely attended meetings to conserve tribal and Agency resources.	Cost reduction

Strategy 2

Implement the NIGC's responsibilities under the Open Government Initiative as defined by the Office and Management Budget's Open Government Directive of 2009 and improve the NIGC website to provide information about the agency and its work.

Supporting Performance Measures	2018 Target
Provide stakeholders a forum for feedback through the NIGC website and social media platforms.	By 2015
Continue to improve the quality, quantity and timeliness of information made available to Tribes through the Tribal Access Portal (TAP).	By 2016
Regularly inform tribes of Agency financial resources (Gross Gaming Revenue, Agency Budget, etc.).	Annual Reporting

Strategy 3

Coordinate and collaborate with tribal, federal, and state regulatory authorities and agencies using a variety of mechanisms.

Supporting Performance Measures	2018 Target
Develop a system for referrals to and from relevant federal regulatory authorities and agencies.	By 2015
Continue to develop partnerships via MOUs with tribal, federal and state regulatory agencies and authorities to that promote efficiency.	Ongoing

Goal 5

Increase efficiency, transparency and accountability

The Commission is committed to building a transparent, high-performance agency. This goal is enhanced by developing personnel related policies, improving technology resources, recruiting and retaining a highly diverse, skilled and motivated workforce, and ensuring that staff is well-equipped with tools and training to work effectively and creating staff performance plans. Within the Agency, the Agency will develop annual budgets and develop policies and procedures as needed. The Commission will improve management and operations by providing ongoing oversight, evaluation and analysis of the NIGC's policies through regular communications between management and staff, refining the Agency's personnel performance-measurement system so that work is clearly related to mission goals and performance measures, implementing an information technology (IT) modernization program to support networked information and shared-data resources and ensuring that the NIGC's financial resources are allocated in the most efficient and effective manner.

Strategy 1

Update and further develop policies that enhance Agency employees' ability to perform their jobs effectively.

Supporting Performance Measures	2018 Target
Percent of employees receiving implementation of new policies through trainings and employee awareness programs.	100%
Percent compliant with mandatory staff training.	100%
Maintain up-to-date human resource policies and procedures.	Reviewed annually
Develop an Action Plan to respond to employee feedback generated by the Employee Viewpoint Survey.	Feedback Reviewed

Strategy 2

Implement and monitor a performance measurement system to enhance employee performance.

Supporting Performance Measures	2018 Target
Implement new performance measurement system.	By 2014
Implement new career development policy.	By 2014

Strategy 3

Develop and maintain more integrated information systems and processes that support the NIGC staff and functions.

Supporting Performance Measures	2018 Target
Implement and realize Agency cost savings and increased IT resources with DOI IT integration agreement.	By 2015 Reviewed annually
Increase the number of communication forums for all users.	Developing baseline

Strategic Plan Framework

Mission Goal Strategy

To work within the framework created by the Act for the regulation of gaming activities conducted by tribes on Indian lands to fully realize IGRA's goals: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities.	Continue the Assistance, Compliance and Enforcement ("ACE") initiative	
	• Increase the availability of technical assistance available and provided to tribes, gaming commissions, and gaming operations	
	• Provide timely responses to Tribes on audit findings to allow adequate time for corrective action	
	• Conduct site visits, audits and evaluations, with particular focus on improvements in tribal internal control systems to maintain the integrity of the gaming industry	
	Improve technical assistance and training for stakeholders	
	• Provide guidance, technical assistance, training, and other forms of assistance to tribes to build and sustain the capability to prevent, protect against, respond to, and recover from weaknesses in internal controls and violations of IGRA and NIGC regulations	
	• Provide opportunities for tribes located within all NIGC regions to participate in trainings	
	Improve and update the NIGC's regulations	
	• Finalize and implement new and revised regulations developed through the regulatory review process	
	Improve consultation, communication and relationship building with tribal, federal and state regulatory authorities and/or agencies	
	• Conduct consultations with tribes on NIGC proposals for regulations, rulemaking, legislation, guidance, policy formulation or actions that may have a substantial direct effect on one or more tribes, on the relationship between tribes and the Federal government, or on the distribution of power and responsibilities between tribes and the Federal government	
	• Implement the NIGC's responsibilities under the Open Government Initiative as defined by the Office and Management Budget's Open Government Directive of 2009 and improve the NIGC website to provide information about the agency and its work	
	• Coordinate and collaborate with tribal, Federal, and state regulatory authorities and agencies using a variety of mechanisms	
	Increase efficiency, transparency and accountability	
	• Update and further develop policies that enhance the Agency's employees ability to perform their jobs effectively	
	• Implement and monitor a performance measurement system to enhance employee performance	
	• Develop and maintain more integrated information systems and processes that support the NIGC staff and functions	



For further information, visit the National Indian Gaming Commission website at:

www.nigc.gov

or contact

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