



Memorandum

Indian Health Service
Rockville MD 20857

TO: Area Sanitation Facilities Construction (SFC) Program Directors

FROM: Mark A. Calkins September 4, 2025
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Director, Division of Sanitation Facilities Construction

SUBJECT: SFC Program, Interim Guidance Memo (IGM) #2025-05
Accountability for Accurate Data in the Project Data System (PDS)

This memo provides interim guidance to SFC program managers on a specific issue or topic area.

Issue/Topic Area:

Expectations and instructions for maintaining accurate data in the PDS.

Background:

Quality, defensible data is a core competency and the foundation of the SFC program. Commitment to the accuracy of data in the Sanitation Deficiency System (SDS) has resulted in consistent Congressional support for annual appropriations most recently reflected in an historic investment of funds from the Infrastructure Investment and Jobs Act (IIJA) to address those deficiencies. Accurate SDS data has also enabled solid, longstanding, and trustworthy partnerships with contributing partners including other federal agencies and tribes. Headquarters (HQ) expects the same level of commitment and focus on data accuracy that Area's have invested into SDS be applied to the PDS.

PDS is the SFC program record for tracking all PL-86-121 SFC projects. PDS supports project management, accounting and fund balances, status tracking and reporting, program workload calculations, and reporting of key performance indicators and efficiency measures including project durations. When data in PDS is maintained properly, Areas can efficiently generate a required final report at the conclusion of the project. HQ and Area SFC programs can also rely on the information in the PDS to be able to defend budget requests, and to confidently respond to White House, Congressional, Tribal and other stakeholder inquiries. Accuracy of PDS upholds the SFC programs' overall unwavering commitment to quality and defensible data.

The guidance in this IGM provides specific instructions and internal controls for the Area SFC Program managers to maintain accurate data in the PDS. This IGM also modifies guidance

provided in Chapter 10 of the [SFC Criteria Manual](#) .

Guidance:

1. Roles and Responsibilities:

HQ is responsible for program oversight, establishing national program guidelines, allocation of appropriated funds, drafting and recommending IHS policies, performing periodic program reviews, and ensuring Area programs are operating in accordance with national guidelines and policies.

The Area SFC program manager is accountable for the effective and efficient operation of the Area SFC program, including accuracy of all PDS data for all projects in their Area.

Self Determination (SD)/Self Governance (SG) partners: When a Tribe or Tribal organization assumes control of the SFC program or a PL-86-121 project using a PL-93-638 Title I contract (under Self Determination authority), or a PL-93-638 Title V compact, annual funding agreement, or Construction Project Agreement (under Self Governance authority), the Tribe/Tribal organization assumes control of and is responsible for the execution of the project in accordance with the terms and conditions of the specific agreement. The Area SFC program manager is responsible for federally inherent and/or contract oversight functions; maintaining and ensuring accurate data in PDS is an example of one of these functions. SFC program managers shall work collaboratively with all SD/SG Tribes/Tribal organizations to ensure reporting requirements that meet contract/ compact requirements are met. Project status and financial reports submitted by SD/SG Tribes/Tribal organizations shall be maintained in the appropriate PDS project record.

2. Deadlines:

The following paragraph in Section II of Chapter 10 “Reporting Systems”, from the Criteria for the Sanitation Facilities Construction Program, ver 1.02 3/13/2003 is hereby modified with new content identified in ***bold italics*** and removed content in ~~striketrough~~ font:

~~Area SFC Programs are requested to maintain and update PDS semi-annually to keep it accurate and current. Tribes are encouraged to provide their respective Areas with data to update the PDS, because the allocation of the IHS appropriated program funds among IHS Areas is determined by Headquarters utilizing mostly PDS data.~~

Area SFC Programs should maintain information in PDS in real time as information and project activity warrants. HQ will measure and reinforce Area-accountability for accuracy of PDS data on the 1st of every month.

In addition to monthly accuracy goals, all new projects must be created (funded from SDS or HPS) in PDS within 30 days after funds allocation from HQ, and all project agreements signed and all funds advised to those projects by the end of the current fiscal year for all IHS appropriated funds. Accurate data from PDS is a factor in the formula for the calculation of annual project RRM.

3. PDS Executive Scorecard:

HQ will distribute a scorecard report of accuracy measures and other key performance indicators to SFC program managers and other IHS executives on the 1st of every month. Reports and other tools will be available in PDS for Area program staff to run independently at any time to gauge compliance with the Executive Scorecard accuracy measures and indicators.

4. Major Components of PDS and Specific Instructions on Select Data Fields

a. Overview Tab:

Project Category: See guidance published in IGM 2025-01 and IGM 2025-02.

Engineer: This field is intended to track the project manager (PM) of the project, which could be an engineer, technician, project officer, or other specific position title.

Project Type: This field was originally intended to track the specific or general type of funding used for the project. With the significant increase in the different types of funding sources that can be applied to SFC projects, the usefulness of this field has significantly diminished. The type of funding used for a project is maintained in the “Fund Advice” record entries on the Funding tab. See guidance in IGM 2025-04 for instructions on how to maintain accurate Fund Advice records.

Delivery Method: Identify the method of SFC program delivery; either IHS Direct Service or Title V Compact.

Procurement Method: This field should be used to identify the project delivery method.

IHS Direct Service

MOA: Federal Procurement
MOA: Federal Force Account
MOA: Tribal Procurement
MOA: Tribal Force Account
MOA: 638 Title 1 Contract
MOA: 3rd Party: Other

Title V Compact

638 Title 5 CPA
MOA

Project Scope: Information on funded construction projects are made available to the public on the SFC Project Dashboard, including the text from the “Project Scope” field. Make sure to:

- Be clear, concise, and professional
- Use plain language and summarize complex technical issues
- Avoid use of poor grammar and jargon
- Do not include Personally Identifiable Information (PII) such as homeowner names or any other sensitive information

O&M Systems: all projects that propose work on a community system should be linked to the appropriate O&M system.

b. Milestones Tab: See guidance published in IGM 2025-02.

c. Homes Tab:

Accurate data on estimated and actual homes is an essential component of maintaining an accurate PDS record. Homes served data provides a critical measure of the overall Program’s impact and effectiveness.

Eligible HITS Homes: Projects serving eligible existing AI/AN homes must be identified on the homes tab and have accurate data attributes such as; reportability, eligibility, home type, first service and service types. The “Estimated Homes” section should correspond to the scope as outlined in the Project Summary.

Eligible non-HITS Homes: This option is only available when the PDS project is funded by IHS housing funds. Housing projects include new and like-new homes to be served and therefore do not require the identification of a HITS home to be initially identified but should match the scope of the Project Summary and include accurate data attributes such as; number of homes and service type.

Ineligible Homes/Units: Projects that include existing ineligible homes/units can be identified as a HITS home or as an ineligible housing group and must have the correct data attributes identified such as; eligibility, home type, equivalent dwelling units (EDU’s) and service types.

As the project progresses, and homes are served, the data in “Actual Homes” section can be updated. The final number of all homes served under the project shall be accurate in the “Actual Homes” section when an actual date is populated in for the project final inspection milestone #3960.

d. Funding Tab: See guidance published in IGM 2025-04.

e. Attachments Tab:

Attachments are an essential component of maintaining an accurate PDS record and when maintained properly can be invaluable to the project manager to efficiently produce a draft final report.

Attachments can be categorized as visible for internal or external users. Areas can establish permissions and categorize system users as internal and external in the Sanitation Tracking and Reporting System (STARS) User Administration section.

1. Depending on the project category, certain HQ-required milestones must have corresponding attachments to support the actual date entered for the milestone. The following list identifies HQ-required milestones that must have attachments. *milestones are only required if/when the project category is Planning.

Code Milestone

*0030 Project Development Plan (or equivalent scope document)

*0040 Planning Agreement

*1100 Preliminary Engineering Report (or equivalent technical justification)

1700 Project Summary

1800 Memorandum of Agreement

1820 Construction Project Agreement

1900 Environmental Review Determination

2699 Construction Documents 100% Complete

2830 Construction Contract Award or equivalent

3960 Final Inspection

4320 Transfer Agreement

4330 Tribal Closeout Letter

4999 Final Report Published

2. Although not explicitly identified as HQ-required milestones, certain additional milestones shall be used and documents attached to ensure a complete and accurate PDS record of funding partners, project stakeholders, project design, procurement, or delivery methods.
 - a. Amendments associated with any HQ required milestones
 - b. Interagency agreements and orders
 - c. Downstream project agreements between Tribal SD/SG partners and communities/villages/water districts, etc

- d. Final Basis of Design records, or equivalent documentation of professional engineering decisions and calculations (as determined by the SFC program manager)
 - e. Individual site layout/designs (if applicable)
 - f. Rights of Way
 - g. Final as-built drawings and records
 3. For projects where tribes have assumed responsibility for program or project delivery through SD contracts or SG compacts and associated project agreements, in accordance with the requirements of the contract or compact, any and all submission of required reports shall be attached to the PDS record.
 - a. Project status and financial reports
 4. Based on HQ experience from audits of projects by OIG, requests from Congress, inquiries from the Whitehouse and/or OMB, inquiries from Tribes and the general public, the following is a list of important documents that should be attached and maintained in the PDS project record:
 - Important letters and memos to/from the Tribe
 - Speciality engineering reports
 - Meeting minutes
 - Contribution/pay requests
 - Final commitment registers
 - Weekly construction status reports/pictures
 - Force Account timesheets and related records
 - Environmental and/or construction related permits
 - Testing reports
 - Pre-final inspection reports and punchlists
 - List of approved homeowners or participants
 - O&M manuals and records
 - Contribution commitments
- f. Journal Tab

Regular journal entries help the PM communicate the story of where the project is at and where it is going.

Journal entries can be categorized as visible for internal or external users. Areas can establish permissions and categorize system users as internal and external in the STARS User Administration section.

“Modifications to the Project Scope” can be made using the Scope Adjustment field. Be aware that scope adjustments are considered public information; follow the guidance provided above in section 4a Overview Tab.

“Final Report Comments” can be added to support the project manager to efficiently produce a draft final report.

General rules/best practices:

- Be succinct and professional
- Provide context to the milestones
- Think succession planning. If you were a new PM taking over an existing project, what information would you need to be able to readily pick up the project?
- Use the email tool to update your tribe and other stakeholders.
- Quality comments allow HQ and Areas to respond to stakeholder and (sometimes) Congressional inquiries.
- Follow Area and District Engineer guidance.

Avoid:

- “no comment” or “none” for Plans . PM should have a well-defined plan of action to move projects forward.
- repeated “no progress” or “none” accomplishments. PM’s should strive to allocate time to advance all assigned projects in some way, even if the step or accomplishment is relatively small.

5. Area-specific Instructions

PDS also allows Areas to establish unique area-defined data fields and milestones to accommodate unique program delivery methods or business processes.

Areas are encouraged to establish supplemental guidance and instructions to this IGM.

Follow additional PDS data requirements and instructions from Area SFC program manager and your District Engineer.

End IGM