



Memorandum

Indian Health Service
Rockville MD 20857

TO: Area Sanitation Facilities Construction (SFC) Program Directors

FROM: Mark A. Calkins August 14, 2026
RADM Mark Calkins, PE
Director, Division of Sanitation Facilities Construction

SUBJECT: SFC Program, Interim Guidance Memo (IGM) #2026-05
Linking Attachments to Milestones in the Project Data System (PDS)

Issue/Topic Area:

Updated instructions for maintaining documents attached to the PDS record including detailed guidance for linking milestone actual dates to attachments.

Background:

Accurate and complete data within the Sanitation Tracking and Reporting System (STARS) is mission-critical to the SFC Program. STARS data are used to report sanitation facility needs to Congress, support budget formulation, track active project status, allocate program and project funding among IHS Areas, and inform funding allocation methodologies used by other agencies.

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. Attachments are an essential component of maintaining an accurate PDS record. When the PDS record 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 PDS to be able to defend budget requests, and to confidently respond to White House, Congressional, Tribal and other stakeholder inquiries. The accuracy of PDS upholds the SFC Programs' unwavering commitment to quality and defensible data.

[IGM-2025-02 "Milestones and Phases in PDS"](#) defined the list of HQ-required milestones for all PDS projects. [IGM 2025-05 "Accountability for Accuracy Data in the PDS"](#) provided various instructions and internal controls for the Area SFC Program managers to maintain accurate data throughout PDS, including a list of milestones that must have corresponding documents maintained on the attachments tab to support the actual date entered on the milestone.

The guidance in this IGM provides operational guidance and internal controls for the Area SFC Program managers to link documents on the PDS attachments tab to milestones and modify guidance previously provided in IGM #2025-05. This IGM also strives to improve the user-

experience, promote simpler data entry, and ensure actual milestone dates entered in PDS are valid.

Guidance:

Section 4e of IGM 2025-05 is hereby replaced in its entirety with the following content:

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

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 STARS User Administration section.

1. Milestones that require linked documents

Depending on the project category, scope, and funding partners, the following list of milestones must have corresponding documents linked to support the actual date entered for the milestone. All milestones that require a linked document will be identified on the Milestone tab with a paperclip icon next to the actual date field.



A. HQ-Required milestones:

Project Category: Planning

- 0030 Project Development Plan (or equivalent scope document)
- 0040 Planning Agreement
- 1100 Preliminary Engineering Report (or equivalent technical justification)

Project Category: Construction

- 1700 Project Summary
- 1800 Memorandum of Agreement (unless N/A is checked)
- 1820 Construction Project Agreement (unless N/A is checked)
- 1900 Environmental Review Determination
- 3960 Final Inspection
- 4320 Transfer Agreement (unless N/A is checked)
- 4330 Tribal Closeout Letter (unless N/A is checked)
- 4999 Final Report Published

Project Category: O&M

1700	Project Summary
1800	Memorandum of Agreement (unless N/A is checked)
1820	Construction Project Agreement (unless N/A is checked)
4999	Final Report Published

B. Amendments associated with any HQ-required milestones:

1. Use the base 4-digit milestone code with a two-digit numerical suffix corresponding to the amendment number.

For instance, use:

1700.01	Project Summary Amendment 1
1700.01.1	Project Summary Amendment 2
1800.01	MOA Amendment 1
1800.02	MOA Amendment 2
1900.01	Environmental Review Determination Amendment 1

If not already established for the project on the Milestones tab, these “Amendment” milestones should be added by clicking the “Add Milestone(s) to the Project” button.

2. Do not use any existing or future Area-defined milestones to track amendments.

For instance, do not use:

1701	Project Summary Amendment #1
1831	Agreement Amendment #1

- C. For projects with any funding received and managed by IHS from interagency partners use this standard milestone:

4400 Interagency Agreement Closeout

Definition: Submission of an interim final report to the funding partner signifying the request to close out the interagency agreement or order.

- D. For projects where additional project agreements are established between Tribal Self Determination/ Self Governance partners and communities/ villages/ water districts, etc., Area program managers should establish unique Area Milestone and link the associated document to the milestone.

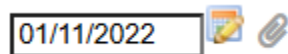
E. Area Milestones:

Areas are encouraged to utilize other standard milestones in the STARS milestone library and establish any additional Area-defined milestones to improve project management, tracking and reporting to funding partners and tribal stakeholders. If added to a project by the Area, the standard milestones below are recommended to require attachments:

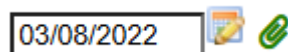
1410	Initial Environmental Review
1600	Archaeological Clearance
2600	Right of Way
2650	Final Basis of Design, (or equivalent documentation of professional engineering decisions and calculations)
4110	As-built/ Record drawings
4210	O&M Manual

2. How to link documents to milestones:

- A. If the milestone paperclip icon is greyed out, even though a date may be present in the actual date field, no document has been linked.



If the paperclip icon is bold green, a document is linked to that milestone.



When linked to a document, the actual milestone displays as read-only on the Milestone tab. To modify the actual date, the user must select the paperclip icon.

- B. There are two ways to upload and link a document to a milestone.
1. From the Milestones tab:
 - Click on the paperclip icon to add / upload a new attachment linked to that milestone.
 - Fill out the information in the dialogue box.
 - **Title:** a short descriptive title is helpful
 - **Description:** optional
 - **Category:** project-specific documents
 - **Subcategory:** optional.
 - **Milestone Code:** auto-populated with the appropriate code.
 - **Milestone Actual Date:** make sure to populate the date of the document (signature date), not “todays” date.
 - **Visibility:** always select external
 - **Add Copy to the Library:** check this box only if you would like to add the document to the larger STARS library; most users should ignore this box.

- Journal Entry: Some milestones may be set up by the Area to require a journal entry. This can be set up in the **Milestone Administration** found on the STARS Maintenance screen (users must have the appropriate permissions). A journal entry can highlight a significant accomplishment, create a “Final Report Comment” to support the automated final report feature in PDS, or create a succinct “Scope Adjustment” from an amendment viewable on the PDS overview tab.
- Click the Save button.

2. From the Attachments tab:

- Click on the “Add Attachment” button
- Follow instructions above in #1 with the following exception: select the appropriate Milestone Code from the dropdown menu.

3. Other documents to attach and maintain in the PDS record:

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 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
- Specialty 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 punch lists
- List of approved homeowners or participants
- O&M manuals and records
- Contribution commitment letters

Effective Date:

This IGM is effective upon issuance and shall remain in effect until incorporated into a future revision of the Criteria for the Sanitation Facilities Construction Program or superseded by subsequent written guidance.

End IGM