



THE SECRETARY OF THE INTERIOR
WASHINGTON

ORDER NO. 3334

Subject: Restructuring the Bureau of Indian Education

Sec. 1 Purpose. Under the Federal Trust responsibility, the United States has charged itself with significant moral obligations to American Indian tribes. We cannot ignore a history of mistreatment and destructive Federal policies that have hurt tribal communities, including repudiated policies regarding the education of Indian children. The boarding school era and other historical failures have created a complicated and difficult legacy for Indian people and their relationship with the Federal Government. The United States must do better. The future of Indian Country rests on ensuring American Indian children receive a high-quality education that honors their cultures, their languages, and their identities as Indian people. To achieve this goal, the Department of the Interior will: (1) strengthen and support the efforts of tribal nations to directly operate Bureau of Indian Education (BIE) funded schools; (2) help tribes to identify, recruit, retain, and empower diverse, highly effective teachers and principals to maximize the highest achievement for every student in all BIE funded schools; (3) build a responsive organization that provides resources, direction, and services to tribes so they can help their students attain high levels of student achievement; (4) foster parental, community, and organizational partnerships to provide the emotional and social support BIE students need in order to be ready to learn; and (5) develop a budget that is aligned with and supports BIE's new institutional focus of providing resources and services to tribes.

The purpose of this Order is to begin the process of implementing those reforms by redesigning and restructuring the BIE into an innovative organization that will improve operations for both tribally-controlled and BIE-operated schools. The redesign and restructuring of the BIE will occur in two phases to ensure an orderly and minimally disruptive transition and will emphasize: (1) improving responsiveness of BIE operational support to schools; and (2) improving performance of individual schools.

Sec. 2 Background. In the area of Indian education, tribal self-determination has become the dominant mechanism for providing education to Indian children. In education, as in other areas of Federal Indian services, Congress and the Administration have recognized that Indian education is most successful when Indian tribes manage their schools. Today, far more BIE schools are run by tribes than by the BIE. However, given the long historical challenges faced by Indian students, it will take time and resources to achieve significant improvement. The Department has comprehensively reviewed the operations of BIE to achieve improvements in Indian education, as described in [Findings & Recommendations Prepared by the Indian Education Study Group](#). The review revealed that significant organizational changes are necessary to provide tribes the resources and support needed to directly operate high-performing schools, to remove institutional obstacles that hamper student achievement, and to enable principals to focus on instructional leadership. The review also highlighted the need to provide

targeted and highly customized technical assistance that meets the unique instructional needs of each BIE-funded school, including instruction on the tribe's language, history, and culture.

Sec. 3 Authority. This Order is issued in accordance with the authority provided by Section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262) and 25 U.S.C. § 13 and § 2006.

Sec. 4 Organizational Changes - Phase I. Phase I will be a transitional phase expected to be operational before the start of School Year 2014-15. Phase I will utilize existing resources and Phase I will focus on improving BIE operational support to schools.

a. Establishment of a School Operations Division. The School Operations Division shall be established and will report directly to the Director, BIE. The Division will focus on teacher and principal recruitment, acquisition and grants, school facilities, educational technology, and communications.

b. Restructuring the BIE. The BIE shall be restructured as follows:

i) Realignment of the Associate Deputy Directors (ADDs). The three current BIE ADD positions will be realigned to the following responsibilities: ADD-Navajo, ADD-Grant Schools, and ADD-BIE-Operated Schools.

ii) Establishment of Education Resource Centers and School Improvement Solutions Teams. The Education Line Offices (ELOs) shall be restructured and re-named Education Resource Centers, each to be staffed by a School Improvement Solutions Team. The teams will provide customized technical assistance to schools in such areas as: curriculum and instruction, data systems, intervention strategies, local job embedded professional development, and school leadership.

iii) Establishment of the Office of Sovereignty and Indian Education. There shall be established an Office of Sovereignty and Indian Education, reporting to the Director, BIE. The Office will focus on supporting tribal sovereignty by building the capacity of tribes to operate high performing schools and allowing tribes to shape what their children learn about their tribes, language, and culture. It will also support grant status for schools, provide support and guidance for effective use of incentive grants, and provide curriculum support for tribal culture, language, and traditions.

Sec. 5 Organizational Changes - Phase II. Phase II completes the institutionalization of the redesign and restructuring of BIE, which is anticipated to occur by the end of the 2015-2016 school year. Phase II will focus on providing the resources and customized technical assistance to support tribes in establishing and operating high-performing schools of their own.

a. Creation of School Support Solutions Teams. At the start of Phase II, School Support Solutions Teams will be created in the office of each of the three ADDs (ADD-Navajo, ADD-Grant Schools, ADD-BIE-Operated Schools). The Team members will be experienced professionals who can provide exceptional customized technical assistance to the schools in the areas of teacher and principal recruitment, professional development, and evaluation; acquisition;

school facilities, financial management, and technology. The teams will work with individual schools and tribes to help maximize school performance.

b. *Realignment of Support of BIE-Operated Schools.* At the start of Phase II, appropriate resources will be transferred from the Assistant Secretary–Indian Affairs (AS–IA) and the Bureau of Indian Affairs to the Director, BIE, for assignment to School Support Solutions Teams.

c. *Enhancing School Improvement Solutions Team Services.* At the start of Phase II, School Improvement Solutions Teams will become responsible for expanding their capacity to support schools by developing local school improvement teams in each school to build and sustain a high quality education, including “cradle to the classroom” assistance with such services as parenting, early literacy, numeracy, vocabulary, local parent counseling, training, and mentoring (parents as trainers and mentors).

Sec. 6 **Implementation.**

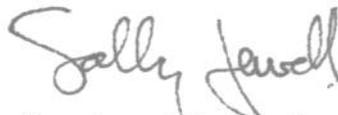
a. The AS–IA will perform a Phase I functional analysis for the new functions and develop a workforce plan to be submitted to the Secretary by August 31, 2014.

b. The AS–IA will perform a Phase II functional analysis and develop a workforce plan, to be submitted to the Secretary before September 2014.

Sec. 7 **Performance Monitoring and Evaluation.** The AS–IA will ensure that progress is monitored toward the goal of American Indian children receiving a high-quality education that honors their culture, languages, and identities, as Indian people.

Sec. 8 **Administrative Provisions.** The AS–IA and the Assistant Secretary – Policy, Management and Budget will take appropriate steps to implement the provisions of this Order.

Sec. 9 **Effective Date.** This Order is effective immediately and will remain in effect until its provisions are incorporated into the Department Manual, or until it is amended, suspended, or revoked, whichever occurs first.


Secretary of the Interior

Date: JUN 12 2014

**Findings and Recommendations Prepared by the Bureau of Indian Education Study Group
Submitted to the Secretaries of the Departments of the Interior and Education**

Date: June 11, 2014

“Education is how we lift people from poverty to a bright future ... The only way to lift people out of poverty is to give them an education that honors their culture, their identity, and who they are as human beings.”

- Sally Jewell, Secretary of the Interior

“The President and I believe the future of Indian Country rests on ensuring that your children receive a high-quality education. Improving academic outcomes for Native American children has never been more important. Unfortunately, too many Native American children are not receiving an education that prepares them for college and career success, too few of them are going to college, and far too many of them drop out of high school. We need to do better.”

- Arne Duncan, Secretary of Education

“If we’re going to be in control of our destiny, then we have to be in control of our own education.”

-Everett Chavez, Governor, Pueblo of Kewa

“What I believe should be the ultimate role of the BIE: to encourage tribes and tribal communities to take over their schools and run those schools themselves. BIE’s efforts should be to fulfill the goals of the TCSA.”

- Bryan Brewer, President, Oglala Sioux Tribe

The Bureau of Indian Education (BIE) – housed in the U.S. Department of the Interior (DOI) – is the legacy of the Indian boarding schools established by the Department of War in the mid-19th century. The Federal Government created the boarding schools as part of a larger assimilation policy that sought to eradicate Native cultures and languages through Western education. Many of the children who attended Government-run boarding schools were taken forcibly from their homes and sent to schools hundreds or thousands of miles away in an attempt to separate them from their families and cultures. Over time, the schools evolved, many becoming day schools for the children in nearby tribal communities. Slowly, educators and the Government began to recognize that assimilation was not the answer, and that tribes possess vast cultural resources that might be completely lost if not fostered both in tribal communities and in schools. The Government ended the devastating policy of assimilation, but sought to fulfill its treaty obligations and trust responsibility to tribes by continuing to provide and fund education to Native students.

Although the Federal assimilation policy ended several decades ago, BIE schools – still funded and many still operated by the U.S. Government – have produced generations of American Indians who are poorly educated and unable to compete for jobs, and who have been separated for years from their tribal communities. All of this has contributed to the extreme poverty on many reservations throughout the country. This Administration is determined to address this

stain on our Nation's history by turning the BIE into an organization dedicated to supporting each tribe's capacity to educate future generations of students who are prepared for college and career and know and value their heritage. Therefore, Secretary Sally Jewell of the U.S. Department of the Interior and Secretary Arne Duncan of the U.S. Department of Education (ED) have formed an American Indian Education Study Group, consisting of academics, school practitioners, lawyers, and experts in American Indian affairs.

I. Executive Summary

After several discussions with tribal leaders regarding systemic issues within the BIE, in September 2013, Secretary of the Interior Sally Jewell and Secretary of Education Arne Duncan appointed the American Indian Education Study Group (Study Group). They directed the Study Group to diagnose the causes of too common academic failure in BIE-funded schools, which are some of the lowest-performing schools in the country. Charged with developing and implementing recommendations to transform the BIE, the Study Group combines management, legal, education, and tribal expertise to ensure that the Study Group's recommendations are grounded in a comprehensive, institutional understanding of how schools work, how effective teaching and learning occur, and American Indian affairs.¹

Based on extensive listening sessions in fall 2013 with tribal leaders, educators, and community members across Indian Country, and analysis of a wide range of primary and secondary data, the Study Group proposed to tribal leaders a redesigned BIE. The redesigned BIE reflects its evolution from a direct education provider to an expert service and support provider, which promotes self-governance and self-determination through tribal operation of schools. The Study Group conducted four tribal consultations on its proposal in spring 2014. The redesign seeks to achieve one overarching goal: that all BIE students receive a world-class education delivered by tribes and supported by the Department of the Interior.

The Study Group, based largely on written comments and feedback received during tribal consultations, recommends that the BIE focus on fostering five areas of reform:

Highly Effective Teachers and Principals – *Help tribes to identify, recruit, develop, retain, and empower diverse, highly effective teachers and principals to maximize the highest achievement for every student in all BIE-funded schools.*

Agile Organizational Environment – *Build a responsive organization that becomes an expert in its field and provides resources, direction, and services to tribes so that they can help their students attain high levels of achievement.*

¹The Study Group is chaired by the Assistant Secretary of Indian Affairs, Kevin Washburn, and members include Charles Roessel, the Director of the Bureau of Indian Education; William Mendoza, Executive Director of the White House Initiative on American Indian and Alaska Native Education; Charles Rose, former General Counsel of the U.S. Department of Education; Marilee Fitzgerald, former Director of the Department of Defense Education Agency; Kenneth Wong, Chair and Professor of the Department of Education at Brown University; and Don Yu, Special Advisor to Secretary Duncan.

Promote Educational Self-Determination for Tribal Nations – *Strengthen and support the efforts of tribal Nations to directly operate BIE-funded schools.*

Comprehensive Supports through Partnerships – *Foster parental, community, and organizational partnerships to provide the academic as well as the emotional and social supports BIE students need in order to be ready to learn.*

Budget that Supports Capacity-Building Mission – *Develop a budget that is aligned with and supports BIE’s new mission of tribal capacity-building and exchanging best practices.*

Once reformed, the redesigned BIE will sharpen the education priority within the Office of the Assistant Secretary—Indian Affairs by realigning existing staff positions and resources to support tribes in building the capacity of their schools, particularly in the areas of talent acquisition and management, strategic and financial management, and instructional improvement. Its organization and budget will be aligned to its new structure, providing greater flexibility and freeing resources to support much-needed educational reforms. Further, departing from the “command and control” culture that is often driven from Washington, DC, the redesigned BIE will facilitate sharing of effective practices among tribally-controlled and BIE-operated schools and open up new opportunities in tribal communities to broaden and sustain school improvement in Indian Country. Finally, the new BIE will promote tribal self-governance and self-determination by encouraging tribes to operate BIE-funded schools, while continuing to fulfill its trust responsibility and treaty obligations.

This report will discuss the nature of the systemic challenges facing the BIE, including insights and input from numerous tribal listening sessions and consultations the Study Group conducted across the country (see Appendix A). It will then detail the Study Group’s recommendations in each of the key areas of reform, highlighting relevant input received in each area of reform. The Study Group hopes the Secretaries will benefit from these recommendations as they proceed to formulate policies for BIE and related American Indian education programs.

II. The Urgent Case for Reform

The BIE has never faced more urgent challenges. These challenges include difficulty in attracting effective teachers to BIE schools located in remote locations, achieving compliance with academic standards in 23 different States, promoting research-based reforms in tribally controlled schools, resource constraints, and institutional and budgetary fragmentation. Both a lack of consistent leadership and strategy – which is evidenced by the BIE having 33 Directors since 1979 – and an inconsistent commitment from political leadership, have hampered the BIE’s ability to improve its services. While operation of Federal Indian education has been transferred to tribes in approximately two-thirds of BIE schools, the BIE has not been adequately restructured to recognize its new primary role of supporting tribal programs (rather than being the primary provider of Indian education). Each of these challenges has contributed to poor outcomes for BIE students and has made it increasingly difficult for BIE leadership to deliver the resources and support tribes need for their schools to be successful.

A. Concentrated Poverty Coupled With Geographic Isolation

Many American Indian students in tribal communities face unique educational challenges, including severe poverty. For instance, according to the U.S. Census, four of the Nation's five poorest counties overlap at least partly with American Indian reservations. These communities experience a high rate of unemployment and a higher concentration of residents who are 18 years old or younger. For example, the Pine Ridge community experiences an 80 percent unemployment rate and the per-capita income is less than \$8,000 a year. In an interview with *Education Week*, the executive director of the Oceti Sakowin Education Consortium (a group representing tribal schools on Pine Ridge and other South Dakota reservations) described the schools' challenge: "[W]e have a lot of young people on the reservation and not nearly enough jobs. So that presents challenges to us as educators when we are trying to convince our young people to stay in school, to do well in school, to graduate, to go on to college."² This chronic high unemployment contributes to substance abuse and domestic violence in tribal communities, factors which present additional obstacles to quality education.

Geographic isolation also contributes to the lack of economic opportunity in tribal communities. Many reservations are located at great distances from cities and do not benefit from the private investment and market-based resources that other communities receive. The remote location of many BIE-funded schools makes it difficult to recruit effective teachers and leaders and to provide them with ongoing professional development. At the same time, remote locations also hamper the delivery of needed complementary services.

B. BIE Students Perform Worse than American Indian Students Attending Public Schools.

Students in BIE schools perform consistently below American Indian students in public schools on National and state assessments. For example, based on estimates from a 2011 study using data from the National Assessment on Educational Progress (NAEP), BIE fourth-graders scored on average 22 points lower in reading and 14 points lower in math than Indian students attending public schools.³ The gap in scores is even wider when the average for BIE students is compared to the National average for non-Indian students.⁴ Furthermore, in reviewing the data on Adequate Yearly Progress (AYP) in 2012-13 (see Appendix C), the Study Group found that only one out of four BIE-funded schools, including both tribally-controlled and BIE-operated schools, met the state-defined proficiency standards. These performance indicators suggest that factors about the BIE system compound the social and economic disadvantages in Indian Country.

²*Education Week*, December 4, 2013, p. 18.

³ U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress, 2011.

⁴ Ibid.

C. BIE Students Perform Worse than Students Attending Department of Defense Schools and Other Schools with High Minority Populations.

Student outcomes in the two sets of schools funded by the Federal Government – the BIE and Department of Defense Educational Activity (DODEA) – are dramatically different. For instance, in 2009, DODEA fourth graders outscored their BIE counterparts by 33 points in math and by 47 points in reading on the National Assessment for Educational Progress (NAEP). DODEA eighth graders outscored BIE eighth graders by 39 points in math and 43 points in reading. These scores place BIE students at approximately the 13-17th percentiles in the entire U.S. (and DODEA students at the 49-57th percentiles). Furthermore, when compared to the eighteen urban school districts with high minority populations that were selected for NAEP’s Trial Urban District Assessment, the BIE underperformed all of these school districts except for Detroit Public Schools.⁵

D. Despite the Bureaucracy and Lack of Support, There are Indications of Progress.

In a recent study by the Northwest Evaluation Association, student achievement “appears to have improved, most notably in math and for students in lower grades. So, while student achievement [in BIE schools] still trails that of other students across the United States as of 2012-13, [the NWEA test] results appear to indicate that student achievement in most grade and subject areas seems to be trending upward (or remaining stable) from prior years.” This is important because it indicates that, when education leadership uses diagnostic tools to address students’ academic weaknesses, improvements in student achievement occur.

This pattern is reflected in two particular examples concerning BIE-funded schools. Dibe Yazhi Hablti’n O’lt’a, Inc., is a tribally controlled school that had a history of poor academic achievement in mathematics and reading. When new leadership arrived and helped educators there organize around the NWEA assessment system, profound improvements in student achievement followed tremendous academic growth across the school year. Years of stagnation were replaced with dynamic improvement.

Likewise, NWEA has been a staple of the education program at Nenahnezad, a BIE-operated school. Because of the school’s leadership and reliance upon diagnostic data to guide instruction, Nenahnezad consistently out-performs all other elementary schools in the region, public and private included. In 2012-13, students attending Nenahnezad Community School were among the highest performers participating in the NWEA’s subset of BIE schools and have consistently improved or maintained performance since 2009-10 in both math and reading.⁶

These examples of successful progress show us that improvement is possible and that BIE must adapt to better support schools and tribes in their efforts at improvement.

⁵ U.S. Department of Education, Trial Urban District Assessment, the Nations’ Report Card.

⁶ *Bureau of Indian Education Report on Student Achievement and Growth: 2009-10 to 2012-13*, Northwest Evaluation Association, February 2014.

III. Institutional and Budgetary Fragmentation and Legal Provisions Prevent the Adoption of Research-Based Reforms.

As discussed further below, after reviewing several studies on the BIE and meeting with numerous stakeholders, it is the Study Group's conclusion that organizational and budgetary fragmentation and several legal provisions prevent the BIE from adopting and implementing significant reforms and limit the BIE's ability to provide the support that its schools need in order to be successful.⁷

A. Recent Reports Identify Key Management Issues Impacting Delivery of DOI's Educational Services.

The Study Group reviewed and accepted the findings and recommendations of two recent reports: (1) the March 2012 Bronner Final Report (the Bronner Report);⁸ and (2) the Government Accountability Office Report 13-774, "Better Management and Accountability Needed to Improve Indian Education" (the GAO Report).

1. The Bronner Report states that Differences Between BIA and BIE Missions Impairs BIA's Ability to Effectively Deliver Support Functions to BIE.

The Bronner Report found that the Indian Affairs' Office of the Deputy Assistant Secretary for Management (DAS-M) and the Bureau of Indian Affairs (BIA) face enormous challenges across a wide range of core support functions and casts doubt on whether the BIA can manage and support the BIE effectively. Notably, the Bronner Report states that the "BIA and BIE are dramatically different from both mission and operational perspectives. As a result, points of view concerning support function effectiveness do not necessarily originate from a similar organizational culture or mindset."⁹

This difference in mission goals and operational perspectives between the DAS-M's office, BIA, and BIE causes shortages and unmet needs at the school level. For instance, the Bronner Report states that the BIA's procurement office fails to distinguish between the needs of a school system and that of a Federal Agency, which causes a failure to timely deliver services, supplies, and textbooks during the time schools are in session.¹⁰

This difference also manifests itself when DAS-M employees conduct the hiring of BIE principals, teachers, and other educational specialists. The Bronner Report discusses the

⁷ The Study Group will be proposing several amendments that would address some of these statutory provisions.

⁸ U.S. Department of the Interior, Bureau of Indian Affairs, *Final Report: Examination, Evaluation, and Recommendations for Support Functions*, Bronner, 2012, p. 11, available at <http://www.bia.gov/cs/groups/public/documents/text/idc017342.pdf> .

⁹ Ibid. p. 11

¹⁰ Ibid, p. 54.

perceived lack of understanding, on the part of DAS-M staffing specialists, regarding the qualifications for reading specialists and special education teachers.¹¹

One report found that there is a large number of outstanding school maintenance projects, including many that involve safety violations in schools.¹² It also found that, if DOI were to replace or perform building rehabilitation on all of the 68 highest-risk school facilities, it could cost an estimated \$1.3 billion.¹³

2. GAO Report Indicates that DOI has Difficulty Delivering Administrative Services to BIE.

The GAO Report, dated September 13, 2013, documents similar management and operational issues within the BIA, the DAS-M's office, and BIE, noting that "[f]ragmented administrative services and a lack of clear roles for BIE and Indian Affairs' Office of the [DAS-M] ... contributed to delays in schools acquiring needed materials, such as textbooks."¹⁴

Among other recommendations, the GAO recommended that DOI revise its "strategic workforce plan to ensure that employees providing administrative support to BIE have the requisite knowledge and skills to help BIE achieve its mission and are placed in the appropriate offices to ensure that regions with a large number of BIE schools have sufficient support."¹⁵ The GAO also recommended that DOI develop a strategic plan that includes detailed goals and strategies for BIE and for those offices that support BIE's mission, including BIA, to help Indian Affairs implement realignment.¹⁶

After the GAO Report was released, the Appropriations Committees, in their Joint Explanatory Statement on the Consolidated Appropriations Act, 2014, stated their expectations that DOI implement certain management reforms:

The Committees are concerned that management challenges within the Department, the Bureau of Indian Affairs, and the Bureau of Indian Education (collectively, "Indian Affairs"), as identified in a September 2013 report by the Government Accountability Office (GAO-13-774), may impact the overall success of the students in the system. Although the Committees are encouraged that Indian Affairs concurred with all of GAO's recommendations and that a full-time director of the Bureau of Indian Education is in place after a vacancy of more than a year, the Committees expect the Secretary to oversee implementation of these management reforms.¹⁷

¹¹ Ibid, p. 89.

¹² Ibid.

¹³ Ibid, p. 80.

¹⁴ U.S. Government Accountability Office. *Better Management and Accountability to Improve Indian Education*. Government Printing Office, Month 2013, p. 1.

¹⁵ Ibid, p. 27.

¹⁶ Ibid, p. 27.

¹⁷ Explanatory Statement on H.R. 3547, the "Consolidated Appropriations Act , 2014", (P.L.

B. Study Group’s Listening Sessions Build on the Findings in the Bronner and GAO Reports.

Using the recommendations in the Bronner and GAO Reports as a foundation, the Study Group then conducted additional, first-hand listening sessions in South Dakota, Mississippi, Oklahoma, Washington, New Mexico, Arizona, and Washington, DC (see Appendix A for participants in the listening sessions). The Study Group met in person with over 300 stakeholders, including BIA and BIE staff, principals and teachers at numerous BIE-funded schools, tribal leaders, and national organizations such as the National Congress of American Indians and the National Indian Education Association. The Study Group also set up an e-mail account (IAEDSolutions@BIA.Gov) where it received over 150 comments that contained recommendations regarding how the BIE could improve the delivery of educational services (see Appendix B for illustrative e-mail comments). The Study Group then received additional feedback during the consultations it conducted in April and May 2014.

In general, the recommendations the Study Group received from stakeholders mirrored some of the recommendations cited in the Bronner and GAO reports. For instance, the Study Group met with dozens of principals of BIE-funded schools who largely complained that the BIE’s complicated bureaucracy made school operations so disorganized and inefficient that it prevented them from focusing on their primary mission of instructional leadership. Many expressed frustrations regarding the DAS-M’s office and the BIA, and the BIE’s inability to affect operational decisions made by the BIA, especially regarding major repairs to school buildings. Numerous principals complained about overly burdensome regulatory requirements and that they routinely had to respond to duplicative data calls from different offices within the BIE, including the Division of Performance and Accountability and the Associate Deputy Director Offices. Numerous stakeholders also complained about the BIE’s “command and control” culture, its poor customer service, and the need for BIE to focus itself on supporting tribes in building the capacity of their schools.

Additional concerns from the listening sessions in Indian Country included:

- Many school facilities are in poor and failing condition and not conducive to a 21st century teaching and learning environment;
- Many principals and teachers expressed concerns that funding appropriated by Congress to the BIE is not reaching the school level and may be paying for unnecessary overhead costs;
- BIE schools have difficulty recruiting and retaining effective teachers and leaders due to the remote location of their schools, lack of teacher housing, and poor school conditions;
- BIE programs and policies are too restrictive and prevent schools from implementing Native language and culture classes;
- Principals and teachers feel unprepared for implementation of the Common Core State Standards (CCSS) and schools lack the information technology (IT) infrastructure to administer cutting-edge assessments aligned with the CCSS;

113-76, Jan. 17, 2014); Jan. 15, 2014 Cong. Rec. at H975.

- BIE and BIA are sometimes unresponsive to BIE schools' requests for assistance regarding alternative definitions of Adequate Yearly Progress (AYP) accountability workbooks, and facility repairs; and
- School boards and tribal councils lack training on their roles and responsibilities, often micromanage day-to-day affairs at schools, and are not prepared to make effective and efficient hiring decisions.

It is clear from the comments received that stakeholders continue to express frustration and confusion about the BIE school system and the roles of schools, principals, BIE, BIA, DAS-M, DOI, and ED. In addition, it is important to note that the Study Group encountered many DOI and BIE employees who were extremely committed to their jobs and remarkably talented. In many cases, employees were performing at impressive levels given the constraints placed on them.

C. The BIE's Fragmented and Prescriptive Budget Cannot be Used Strategically to Support School Reforms.

The Study Group analyzed the BIE's budget structure and found it to be highly fragmented and prescriptive. Specifically, the BIE's annual budget typically consists of 46 different budget sub-activities, and the BIE receives this funding from Congress through multiple sources (ED, Health and Human Services, BIA and DAS-M). Furthermore, approximately 99 percent of the BIE's funding is formula-based and designated directly to schools. BIE has no direct access to these funds, leaving the BIE Director with less than 1 percent of the total budget for discretionary purposes. This is in sharp contrast to a typical school district, where the school board and the superintendent would maintain 12 to 15 percent of funding for discretionary purposes. The lack of discretionary allocation authority substantially weakens the BIE's ability to exercise strategic leadership or achieve educational priorities. In other words, the BIE's budget structure reduces the BIE to a mere pass-through and constrains the BIE's ability to leverage the funding it provides to schools to drive reforms.

Moreover, due to a unique provision in the Tribally Controlled Schools Act, tribally controlled schools are permitted to retain Federal carry-over funds and also place any current or carried over grant funds in interest-bearing accounts prior to expenditure. In other words, the Tribally Controlled Schools Act provides an incentive for tribally controlled schools not to spend funding they receive from BIE and ED. Under the Act, schools already may spend any interest income earned on any school costs, but must spend the principal in accordance with the purposes of the respective programs. The BIE has contributed to this issue by not implementing policies that encourage schools to fully utilize funds and discourage schools from planning for carryover. According to our review of fiscal year (FY) 2012 A-133 audits of tribally controlled grant schools, a substantial amount of carryover funds exists in some schools. For instance, although the audit information is incomplete, approximately 80 BIE-funded tribally controlled schools have retained approximately a total of \$125 million in unspent funds that have accumulated over time. ED and BIE should provide tribes with technical assistance and practical guidance with respect to the activities and projects for which these can be expended under current laws.

D. The Self-Determination Context of BIE’s Unique School System Challenges DOI to Deliver Services and Resources to Tribally Controlled Schools Using Different Models.

In addition to organizational and budgetary fragmentation, important Federal Government principles unique to the field of Indian affairs challenge the BIE to improve performance in its schools with specialized attention.

1. Mandates are Inconsistent with the Purpose of the Tribally Controlled Schools Act.

The DOI fully supports the principles of self-determination that are embedded in the Tribally Controlled Schools Act (TCSA) and the Indian Self-Determination and Education Assistance Act. The TCSA prohibits DOI from issuing regulations that address the planning, development, implementation, and evaluation of the Tribally Controlled School Act grants.¹⁸ In general, if a tribally controlled school meets the statutory eligibility requirements (generally financial in nature), the Secretary of the Interior must continue to provide the school with funding.¹⁹ As a result, DOI cannot, for example, require tribally controlled grant schools to adopt a performance-based evaluation system that includes student achievement as a measure, or remove chronically ineffective full-time employees (FTEs) from BIE-funded schools. This is not just an issue important to the BIE; tribes similar challenges in holding their tribal schools accountable. As discussed in further depth below, the Study Group recommends that the BIE provide incentives to tribally controlled schools, since such an approach is more closely aligned with the purpose of the Tribally Controlled Schools Act.

2. BIE is not eligible for certain Federal programs that provide assistance to States and local school districts.

The BIE has been ineligible to participate in several funding opportunities available only to State Educational Agencies (SEA) and Local Education Agencies (LEA). Lack of access to certain programs that are designed to build SEA and LEA capacity further constrains DOI’s ability to reform the BIE-funded schools. ED and DOI have already agreed to explore potential avenues to increase the resources that are available to BIE for that purpose.

3. Appropriations Legislation Generally Prohibits BIE from Funding New Charter Schools.

Public Law 112-14 generally prohibits BIE from funding any new charter schools (some were already in existence prior to 1999): “Funds made available under this Act may not be used to establish a charter school at a Bureau-funded school (as that term is defined in section 1141 of the Education Amendments of 1978 (25 U.S.C. § 2021)), except that a charter school that is in existence on the date of the enactment of this Act and that has operated at a Bureau-funded

¹⁸ 25 U.S.C. § 2509.

¹⁹ 25 U.S.C. § 2505.

school before September 1, 1999, may continue to operate during that period...”

Several tribes are already operating charter schools under applicable state charter school legislation. The Study Group encourages the Department to consider changes in future budget proposals that would indicate support for tribally controlled, operated and funded charter schools in States that authorize charter schools. If legislation is amended to allow BIE to fund additional charter schools, we would also propose the Department evaluate charter school funding requests on a case-by-case basis to ensure alignment with state charter requirements and in a manner that would prevent duplicative funding, dilution of per student funding and is consistent with legislation that addresses grade expansion. Such an assessment conducted on a case-by-case basis would also ensure that tribal education priorities are preserved.

IV. Recommendations for Transforming the BIE

Federal efforts in American Indian education have been fraught with the legacy of boarding schools and the lack of consistent leadership and long-term strategy for the BIE. As in all other areas of Government services, Federal American Indian programs generally work best through tribal self-determination, when tribal institutions are enlisted to direct them. The goals for the BIE that are presented in Section I of this report are aligned with President Obama’s agenda to (1) ensure that our Nations’ students are ready for college and careers; and (2) promote tribal self-determination. Accordingly, in order for the BIE to achieve these goals, it must shift significant attention towards providing the services, resources, and technical assistance that tribes need in order to operate high-achieving schools, while also ensuring quality education in the remaining BIE-operated facilities.

A. A Federal and Tribal Vision: A World-Class Instruction for All BIE Students Delivered by Tribes

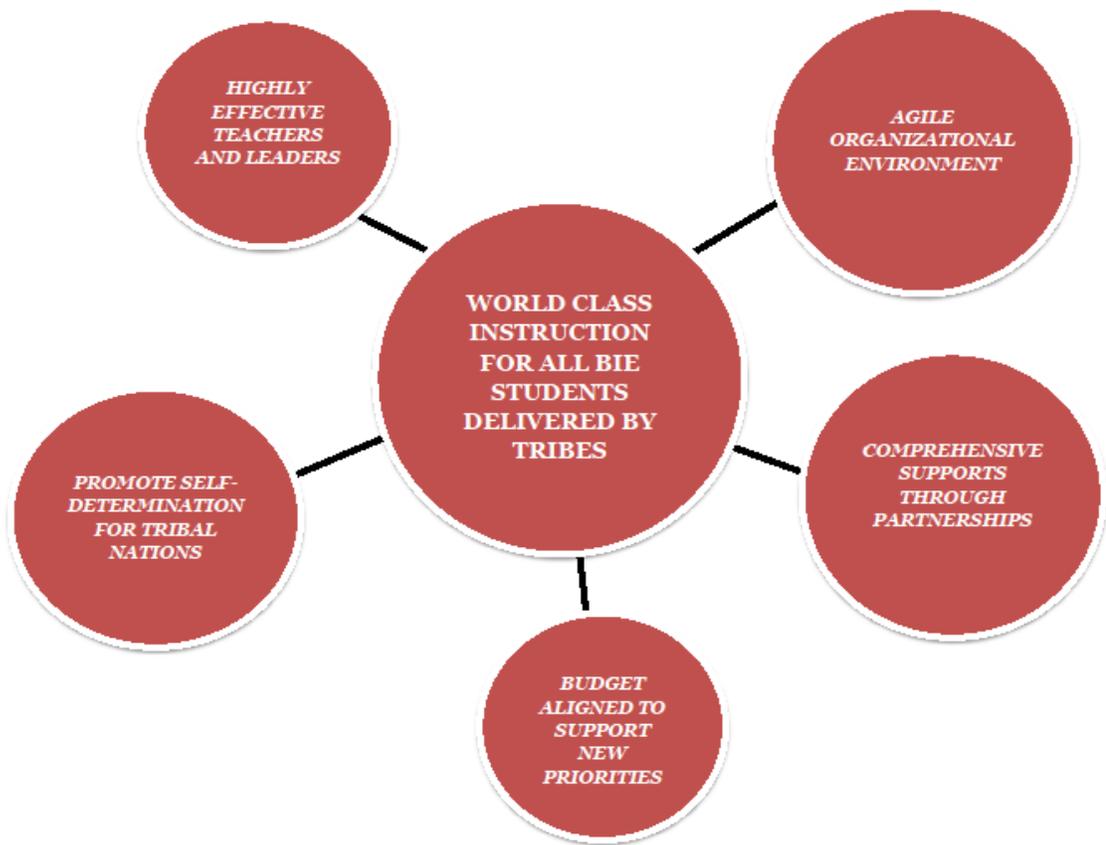
Support tribes in their efforts to ensure that all BIE students are well-prepared for college, careers, and tribal citizenship.

If redesigned, the BIE can help provide the services, resources, and technical assistance that tribes need in order to directly operate high-achieving schools. In turn, this restructuring will result in schools that can adequately prepare their students for college and the workforce. The BIE should also provide tribes with high-quality professional development in the areas of parent involvement, Common Core State Standards, high-quality assessments, integration of language and culture, and effective use of data in decision-making. The Study Group envisions a redesigned BIE becoming a resource center and provider of technical assistance to all tribally controlled schools.

A redesigned BIE must also make instructional improvement a top priority. High-performing school systems have focused on multiple instructional improvement strategies, including: improving the curriculum through the adoption of the Common Core State Standards and aligned high-quality assessments; implementing job-embedded professional development (e.g., using technology to deliver support) with coaches (essential for the remote and geographical dispersion of its schools); and supporting/enhancing the skills of principals and other school leaders to effectively evaluate teacher performance. These reforms recognize that delivering excellent

instruction requires teachers and principals to develop a repertoire of technical and strategic instructional and leadership skills. Further, turnaround research has found that the best performing school systems intervene at the level of the individual student, developing processes and structures within schools that are able to identify whenever a student is starting to fall behind, and then intervening to improve that child’s performance. There are strategies that schools can use to compensate for the disadvantages resulting from some students’ home or community environment.²⁰

As discussed above, to achieve world-class instruction for all BIE students, the Study Group proposes that DOI focus on the following five core areas of reform: (1) highly effective teachers and principals; (2) agile organizational structure; (3) promotion of self-governance; (4) comprehensive supports through partnerships; and (5) budget aligned with previously stated priorities. The five core areas of reform are discussed further below:



²⁰ *How the World’s Most Improved School Systems Keep Getting Better*, McKinsey & Company, November 2010.

B. Reform Area One: Highly Effective Teachers and Principals

Help tribes to identify, recruit, develop, retain, and empower diverse, highly effective teachers and principals to maximize the highest achievement for every student in all BIE-funded schools.

Student outcomes can improve only with changes in classroom teaching and learning. While research has suggested many ways to improve a school system's outcomes for students, three factors matter most: (1) hiring effective teachers and principals; (2) developing teachers and principals continuously; and (3) providing targeted support to ensure every child can benefit from high-quality instruction. Research demonstrates that the main driver of the variation in student learning at school is the quality of teachers and principals. Seminal research based on data from Tennessee showed that if two average 8-year old students were given different teachers—one of them a high performer, the other a low performer—their performance deviated by more than 50 percentile points within 3 years.²¹ Effective principals are also critical to student achievement. Replacing an “average” principal with an outstanding principal in an “average” school can increase student achievement by over 20 percentile points.²²

There is no one-size-fits-all model of reforms for low-performing school systems. The reform literature suggests that the starting point for a school's improvement is a deliberate examination to determine its deficiencies and its capacity to reverse its own course. From this process, each school develops a school improvement plan that applies best practices and interventions that meet the unique needs of each school. Accordingly, the Study Group's recommendations focus on how a redesigned BIE can help tribes recruit, hire, and develop effective teachers and leaders (new and tenured), and promote teacher and school accountability. Such support from the BIE will include innovative recruitment and outreach, professional development, collaborative practice, coaching, career tracks, rigorous certification and selection requirements, and sustained support from the BIE to tribes.

Because talent recruitment is a serious challenge in many rural BIE and tribally controlled schools, the Study Group recommends that the BIE focus on developing the skills of current instructional staff by providing them with robust, sustained professional development, including incentives for teachers to enroll in the National Board Certification program. The BIE should also implement a portfolio of talent recruitment, retention, and career development strategies. Such a plan may include several components, including a gap analysis between academic needs and the supply of qualified teachers by subject areas, creating housing and other incentives for potential teachers, and supporting a school climate that is conducive to teaching and learning. During recent consultations, several BIE stakeholders emphasized that the lack of adequate housing for teachers on reservations was the most significant challenge they faced when trying to recruit teachers to their schools. These stakeholders requested that the BIE and ED provide them

²¹ Sanders and Rivers, *Cumulative and Residual Effects of Teachers on Future Academic Achievement*, 1996.

²² Marzano, Waters, McNulty, *School Leadership That Works: From Research to Results*, 2005.

with greater flexibility to spend Federal education funding on capital investments such as teacher housing.

An essential element of developing instructional and leadership talent capability is a performance-based teacher and principal evaluation and support system that has multiple measures, including student growth, to inform professional development. The BIE is currently piloting such an evaluation system in BIE-operated schools in two of its regions and intends to scale up implementation of this system to BIE-operated schools in the East region during the next school year. Based on the implementation experience during the pilot phase, the Study Group supports sharing the successes of the performance-based evaluation system with tribally controlled grant schools for their consideration in the near future. At the same time, the Study Group recognizes that the BIE may need to provide incentives to tribally controlled schools to highlight the opportunities of adopting such a system.

The Study Group also recommends a system of performance-based evaluation for non-certified staff, including business managers/personnel, home living specialists, food services supervisors/leads, school transportation leads, and facility managers. This system would enable schools that have experienced enrollment declines in the classroom to identify its most effective staff in the face of required cuts.

The Study Group analyzed the staff-to-student ratio across all BIE-funded schools (see Attachment D). For BIE-operated day schools, the ratio of certified teaching staff to students was 1 to 10. However, the ratio was lower in tribally controlled day schools, which had an average of 1 certified teaching staff to 8.7 students. Similar patterns were found regarding the ratio between non-certified employees and students. In BIE-operated day schools, that ratio was 1 to 5.2, as compared with a ratio of 1 to 4 in tribally controlled day schools. In other words, when faced with a declining enrollment, tribal school boards would be able to make hiring adjustments, informed by staff performance, especially in the non-certified positions. During recent tribal consultations, several BIE stakeholders stated that some BIE schools have high numbers of non-certificated staff due to lack of access to services that are available to other school systems. School staffing decisions must take into account the unique circumstances of each school. For instance, because many of these schools are located in remote regions, they must hire water technicians, firefighters, boiler operators, plumbers, electricians and carpenters. In addition, BIE operates 65 facilities with residential programs that require full time staffing 24 hours a day, 5 to 7 days a week. Critically, however, BIE lacks the ability to ensure that tribally controlled schools adopt certain human capital reforms, including performance-based evaluations tied to student achievement. Accordingly, as discussed in greater detail in Section D below, the Study Group recommends that Congress provide BIE with incentives to promote such school improvement efforts in tribally controlled schools.

Human Capital Recommendations:

- Improve BIE's existing internal capacity to provide technical assistance to tribes around professional development, modeling, coaching, and the monitoring and evaluating process;

- Upgrade the skills of existing teachers and principals (e.g., instructional coaches at the school level, professional development focused on differentiated instruction, project-based learning, and cooperative learning) by providing incentives for instructional staff to voluntarily enroll in the National Board Certification program and professional development process;
- Improve BIE’s ability to help tribes develop and resource talent management and acquisition programs within tribal educational agencies;
- Create new, high-quality teacher pipelines from colleges, including tribal colleges and universities (TCUs), to BIE schools by providing TCUs with support to improve and expand effective teacher education programs;
- Provide incentives to recruit effective teachers and principals (e.g., allow schools to spend funding on teacher housing, providing housing stipends, loan forgiveness, and educational benefits);
- Provide incentives to tribes to adopt certain staffing formulas and performance-based evaluations that are tied to student achievement; and
- Ensure appropriate reward and remuneration structure for teachers and principals.

C. Reform Area Two: Agile Organizational Environment

Build a responsive organization that provides resources, direction, and services to tribes so that they can help their students attain high levels of achievement.

The second area of reform focuses on addressing the numerous complaints that principals at BIE-funded schools have regarding the bureaucracy at BIE, BIA, and the DAS-M’s office. According to this feedback, this bureaucracy requires principals to focus an inordinate amount of time on school operations, rather than focusing on their primary mission of instructional leadership. This governance structure—where decision-making power over school operations is divided among the BIE, BIA, and the DAS-M’s office—also hinders attempts to reform the BIE in a systematic and comprehensive manner. These multiple centers of power and competing priorities affect BIE’s policy agenda and make it difficult to implement reforms or sustain any meaningful progress.

Research shows that management redesign that co-locates decision-making authority and reduces bureaucracy can enable low-performing school systems to leverage resources and talents to raise student academic performance. In an extensive analysis of a U.S. Department of Education longitudinal school achievement database (1999-2003) of over 100 school districts, a research team found that an integrated management system enabled school districts to improve their academic performance.²³ School districts that shifted from a fragmentary system to a coordinated, integrated system saw a closing of the achievement gap with the statewide averages in core subject proficiency.²⁴

²³ Wong, et al., *The Education Mayor*, 2007.

²⁴ In statistical terms, districts with integrated management, relative to other districts in the state, improved their net proficiency standing on the average by approximately 0.15 to 0.19 standard deviations in elementary reading and math. A more recent analysis on 10 years of student achievement data (1999-2010) for all the schools across three states (New York, Massachusetts,

In the remaining schools run by the BIE, and in tribally controlled schools supported by the BIE, an integrated management structure for the BIE could improve student outcomes in similar ways. While acknowledging that BIE-funded schools are unique, it helps to address the problem of institutional fragmentation within this set of schools.

An integrated management structure would also help the BIE better provide services to tribally controlled schools. In order for the BIE Director to perform his/her responsibility to raise Native student performance, the Director—and not the BIA or DAS-M's office—must be enabled to make decisions regarding functions that affect school quality and performance. Schools must receive primary attention in meeting their needs in talent management and acquisition (namely, hiring qualified teachers and principals in a timely manner), strategic and financial management, IT infrastructure, facilities, data management, and instructional resources, including support for implementation of the Common Core. Such an integrated management system would create the necessary conditions to enable schools to improve their academic performance, as evidenced in other districts that implemented the change in their management and governance systems.

Redefining the role of BIE's central office as a school improvement organization with an improved focus on building the capacity of tribes and tribal education agencies would allow the redesigned BIE to accomplish the following:

- Fulfill the directive in the Tribally Controlled Schools Act that BIE be responsive to the needs of tribal communities;
- Improve services that are delivered to tribally controlled schools, including services involving new school construction, major repairs, and other operations and maintenance issues for facilities;
- Ensure that decisions affecting school operations, including the design of buildings and IT needs, at BIE-funded schools are aligned to educational goals and priorities; and
- Provide incentives to replicate successful tribally controlled school structures.

The DOI can achieve this goal by transforming the BIE into a lean and efficient school improvement organization, which is primarily focused on providing services and resources to BIE-funded tribally controlled schools that improve school operations and instruction, rather than expending its resources on the direct operations of schools. The Study Group proposes that the redesign recommended here occur in two phases for two reasons: first, to provide principals at BIE-funded schools with immediate relief; and, second, to ensure that BIE's long-term trajectory is aligned with increased tribal control over schools and improved delivery of services. In short, BIE must become an expert educational agency before it can effectively support tribally controlled schools.

and Illinois) provides additional supportive evidence on the positive relationship between integrated management system and student achievement. In New York State, there is a significant, positive relationship between a school in an integrated system and achievement growth in 8th grade math and reading, and in 4th grade math. In Chicago, there is a significant positive relationship between integrated management and achievement growth in 8th grade math and reading. In Boston, integrated management has a significant, positive effect on 4th grade math proficiency.

The first phase of this transformation plan will address long-standing concerns that the Study Group heard from principals and other school officials regarding poorly managed school operations. Major stakeholders such as the National Indian Education Association have recommended that, in order to address poor school operations, that BIE have control over decisions affecting school operations in its schools. In order to immediately address these concerns, we recommend that BIE operationalize this transitional phase before the start of the 2014-15 school year. To the greatest extent possible, to avoid the need for additional hiring, the Study Group recommends that the initial phase would be staffed with existing full-time employees (FTEs) and resources from the DAS-M's office, BIA, and BIE, and will focus on improving the operational support that BIE should be providing to its schools. This school operations division will report directly to the BIE Director, thereby improving efficiency and accountability.

Accordingly, the Study Group recommends that the BIE create Education Resource Centers, geographically positioned close to schools and staffed with mobile School Solutions Teams that can be deployed to schools to provide customized support that meets the unique needs of each school. Instead of issuing mandates to schools, these teams will ensure that principals and teachers have the resources and support they need in order to operate high-achieving schools. These teams can be effective in assisting schools in their improvement efforts by making available data-supported best practice models in such areas as school management and climate, professional development, curriculum, and instruction. The teams will not be micromanaging or directing reforms in schools, but would be directed to listen to principals and teachers and then provide the support that is requested.

The second phase of the BIE redesign will ensure that BIE's resources and staff are focused on BIE's longer-term mission of transferring control over schools to tribes. Accordingly, it will also ensure that tribes have the necessary resources and customized support they need in order to succeed. At the start of the second phase, School Support Solutions Teams located in regional offices will be deployed to schools to provide customized technical assistance. Each tribe and school is different, but these needs could include additional support in the areas of teacher and principal recruitment, professional development, and evaluation; acquisition; school facilities; financial management; and technology.

Agile Organizational Structure Recommendations:

- Support BIE-funded schools to develop and resource or improve their own talent management, logistics, and information technology divisions;
- Offer tribes financial management and budget execution guidance and training;
- Provide customized technical assistance to enable tribal educational agencies to perform LEA-like functions to manage their schools;
- Facilitate tribal consortia for purchase of universal products and services to reduce costs (e.g., textbooks, technology, and special education related services);
- Assist tribes by training human resource staff at tribal schools and recruiting highly effective teachers and principals through the use of effective marketing and through the use of National connections and the development of a database;

- Develop a toolbox of interventions to meet and/or customize to the needs of schools in varying states of performance;
- Share best practices and research in teaching, learning, and leading schools (e.g., effective interventions to improve student achievement and reduce the achievement gap); and
- Provide, if necessary, training to school boards.

D. Reform Area Three: Promote Educational Self-Determination for Tribal Nations

Strengthen and support the efforts of tribal Nations to directly operate BIE-funded schools.

In order to align the BIE’s redesign with President Obama’s core policy of self-determination for tribes, we recommend that the BIE support tribal Nations in assuming control over BIE-funded schools. Increasing tribal control over BIE schools would recognize the sovereign status of tribes and provide them with greater discretion to determine what should be taught to their children. This includes the decision-making authority to determine whether students should be taught their Native languages, cultures, and histories in BIE-funded schools.

Supporting the efforts of tribal Nations to govern their own schools will also lead to improved student achievement. As demonstrated in other areas in which tribal Governments have assumed control of Government services, tribal Nations often improve the delivery of services because tribes: (1) understand the needs of their communities better than the Federal Government does; and (2) are more likely to be held accountable for results by local communities.

Further, supporting the efforts of tribal Nations to govern their own schools would help accountability and reduce institutional fragmentation throughout the BIE-funded school system. Under the current statutory and administrative framework, the BIE acts as a quasi-SEA for some funding purposes, while its grant and contract schools operate as LEAs. These tribally controlled schools receive funding directly from the BIE, are directly operated by local school boards, and are highly independent agents.²⁵ As a result, the current structure does not provide tribal Governments an opportunity to manage the schools located on their lands as an LEA does. This contributes to the overall institutional fragmentation of the BIE-funded school system, making it more challenging to implement reforms in a comprehensive and system-wide manner across a set of schools located on a single reservation.

The Department of the Interior fully supports tribes’ sovereign right to determine the structure of their own tribal government and school systems; however, that support can be strengthened by facilitating the sharing of information on and exploration of particularly efficient and successful school structures.

²⁵ There are exceptions to this general practice. For instance, the Mississippi Band of Choctaw operates their eight tribally controlled grant schools as a single LEA. Here, the Tribal Nation is the direct recipient of BIE funds. The Study Group considers this integrated governance structure a best practice.

Self-Determination Recommendations:

- The Study Group recommends providing incentives to tribal Governments to assume control over remaining federally operated schools, including providing full funding for contract and grant support costs and addressing facility needs for schools;
- Encourage and provide opportunities for tribal Nations to operate and manage their schools and receive funding directly from the BIE;
- Clarify the maximum amount of discretion that tribally controlled schools have to teach Native languages, cultures, and histories to their students;
- Provide technical assistance on how curriculum regarding Native languages, histories, and cultures can be aligned to Common Core State Standards; and
- When requested, provide customized technical assistance through School Solutions Teams to support tribes when tribes request assistance regarding resources or support for improving school operational practices at BIE-funded schools.

E. Reform Area Four: Comprehensive Supports through Partnerships

Foster family, school, community, and organizational partnerships to provide the academic as well as the emotional and social supports BIE students need in order to be ready to learn.

BIE students, and American Indian students generally, face a multitude of challenges, including emotional trauma and depression due to numerous environmental factors such as high unemployment, rampant crime, substance abuse, and poor health outcomes. In order to address the unique needs of this student population, the Study Group recommends that DOI and its partners live up to BIE's mission and take a holistic approach to provide comprehensive support to BIE students so they can come to class ready to learn.

Facilitating public and private partnerships between tribes and local, regional, and National organizations will ensure that all schools have the opportunity to benefit from resources made available. Leveraging local and National expertise, for example, will enable schools to more effectively address student needs, such as social and emotional counseling, bullying prevention, parent engagement, and early childhood education. The DOI can take a critical first step in creating public-private partnerships by reinstating the National Fund for Excellence in American Indian Education (the Fund), a congressionally chartered non-profit foundation with the mission of supporting BIE-funded schools. With a strong Executive Director and an active Board, the Fund – which was organized and incorporated in 2004, but has been inactive since early 2007 – could support the BIE in addressing needs in a more expedient and strategic manner. It would do so by soliciting and managing private donations to support BIE's important work. Further, with constrained budgets at both the Federal and tribal levels, partnerships have become increasingly important in equipping the BIE to continue fulfilling its trust responsibility for American Indian education. At the local level, BIE-funded schools should also be encouraged to collaborate with local public schools on issues such as school calendars, professional development, and curriculum implementation to increase consistency as students transition between school systems.

In addition, the Study Group recommends that the BIE’s approach cut across all Federal agencies and their community-based programs that serve tribal communities. Because each agency has traditionally implemented these programs in separate silos, tribes experience redundancy, disconnection, and a waste of Federal resources. On the other hand, if Federal agencies work hand in hand (with each other and with tribes), and break out of those silos that stifle reform, they can fundamentally transform BIE schools and the distressed tribal communities in which they are located.

Comprehensive Supports through Partnerships Recommendations:

- DOI can take a critical first step in creating public-private partnerships by reinstating the National Fund for Excellence in American Indian Education, a congressionally chartered non-profit foundation with the mission of supporting BIE-funded schools;
- Coordinate with other Federal agencies so that community-based tribal grants help provide wraparound services to students attending BIE-funded schools;
- Work with Indian Health Service (IHS) to increase and institutionalize the practice of providing of school-based services to ensure that students are ready to learn and can focus (e.g., provision of immunizations in time for start of school and counseling services);
- Provide incentives to tribes to co-locate other tribal support services near BIE schools; and
- Work with the tribal grant schools to improve applications and obtain all available E-rate funding.

F. Reform Area Five: A Budget Aligned to Support New Priorities

Develop a budget that is aligned with and supports BIE’s new institutional focus of providing resources and services to tribes.

In order to properly serve tribally controlled schools, the BIE’s budget must be aligned with its new priorities as identified in the circles of reform discussed above. There are some budget supports that cut across all four circles – e.g., investments in IT infrastructure and 21st century teaching and learning environments – and others that are specific to particular circles of reform. These budget supports are described in more detail below.

1. Reform Areas 1 – 4: Invest in Infrastructure to Improve Teaching and Learning

Based on tribal consultation and other available information, the Study Group believes BIE currently lacks the necessary infrastructure that would undergird any serious effort to reform this set of schools. During recent tribal consultations, the Study Group repeatedly heard that issues related to the poor condition of school facilities demanded so much time and attention from principals that they were diverted from their primary mission of instructional leadership. Furthermore, in an official Federal report published in 2011, a negotiated rulemaking committee found that “63 [BIE funded] schools remaining in poor condition as of September 2011 require

an estimated \$1.3 billion to elevate them to an acceptable condition.”²⁶ The same report estimated that approximately \$967M is needed to address BIE’s repair and maintenance backlog.²⁷ The Study Group finds that DOI’s Federal appropriations for BIE school facilities have not kept pace with the deterioration of school facilities and the essential educational requirements for 21st century teaching and learning, *e.g.*, integration of technology and multi-media in instruction. Of the 183 BIE schools, 34 percent (63 schools) are in poor condition, and 27 percent are over 40 years old. These substandard conditions are not conducive to educational achievement, and they unfairly restrict learning opportunities for students.

Although buildings alone do not make a 21st century teaching and learning environment, research has found that the quality of *where* we learn affects the quality of *how* we learn. Multiple studies have found significant links between inadequate facility conditions and poor performance for students and teachers.²⁸ In addition, the quality of physical environments – including those impacting temperature, lighting, acoustics, and age – affect dropout rates, test scores, student behavior, and teacher retention, which are all issues at BIE-funded schools. For example, researchers at Georgetown University have found that improving a school’s physical environment can increase test scores by up to 11 percent. Other studies have found a difference of between 5-17 percentile points in the achievement of students in poor buildings and those students in educationally appropriate school buildings (when socioeconomic status of students is controlled).²⁹ Thus, the condition and upkeep of BIE-funded schools must be addressed in the ongoing discourse about student achievement, teacher effectiveness, and accountability.

In recent hearings regarding DOI’s 2015 budget, there appears to be evidence of bipartisan interest from both the House and Senate Appropriations and Authorizing Committees to address BIE school facilities issues. The Study Group recommends that DOI seek an increase in funding to support new school construction, the Study Group will assist BIE in developing a 6-year facilities plan to bring all schools in poor condition to an acceptable condition level. This plan would be based on a similar 6-year strategy used by DODEA to successfully replace and upgrade 70 percent of its schools in poor condition – a \$3.7 billion investment. This plan could be used in future budget formulation.

The Study Group also recommends that DOI invest in broadband, as well as seek additional funding from other agencies, for all BIE-funded schools since such an investment cuts across the other four circles of reform. Many of the BIE’s schools are located in the most remote locations in the country, and most schools have only a T1 level of connectivity – woefully inadequate to meet the demands of 21st century teaching and learning. To ensure that BIE students have equal access to the College and Career Ready and aligned computer-based online assessments (either

²⁶ Negotiated Rulemaking Committee Report “Broken Promises, Broken Schools,” at p. 9, available at <http://www.bia.gov/cs/groups/xraca/documents/document/idc1-025523.pdf>.

²⁷ *Id.* at p. 9.

²⁸ Negotiated Rulemaking Committee Report “Broken Promises, Broken Schools,” at p. 9 (“These studies have found that the quality of physical environments—including temperature, lighting, acoustics, and age of facilities —affects dropout rates, teacher retention, test scores, and student behavior”) and appendix c (citing studies).

²⁹ *Ibid.*

Smarter Balanced Assessment Consortium (Smarter Balanced) or the Partnership for Assessment of Readiness for College and Careers (PARCC)), the Study Group proposes a critical one-time start up investment on a sound IT infrastructure.

By helping connect teachers to students and parents, and helping schools share classes, curricula, and other resources, broadband-enabled teaching and learning has begun to fundamentally reshape education at all levels and has improved access to expanded educational opportunities for all students. Broadband access is particularly important for schools located in remote locations because it can mitigate the devastating impact that geographic isolation can have on student achievement, particularly lack of access to deep applicant pools of effective teachers and principals. Still, research shows that rural schools and communities have insufficient broadband coverage when compared with their non-rural counterparts and are in danger of falling further behind, particularly as the rest of the country races forward with implementation of the College and Career Ready Standards and aligned assessments.

The information technology infrastructure in virtually all BIE schools requires significant upgrades. In an initial assessment of BIE IT capabilities, it is estimated that 25 percent of BIE schools still use the Windows XP operating system. Smarter Balanced and PARCC require, at a minimum, Windows 7. Many new computers must be purchased that are capable of running Windows 7. Additionally, 60 percent of BIE-funded schools do not have the bandwidth or computers to administer a test 3-5 times annually (as proposed by Smarter Balanced). An investment must be made in network bandwidth to bring BIE-funded schools up to the necessary bandwidth levels. Additionally, the technology infrastructures within the schools need improvements across the board. New wiring, switches, routers, wireless access devices, and more need to be purchased so schools have well-functioning networks. Lastly, teachers need professional development so they can effectively use the new tools and technology.

The Study Group suggests a one-time, start-up investment of funding that would be used to make the following basic upgrades to the BIE's IT infrastructure: (1) procure the type of computers and software necessary to administer online assessments; (2) increase bandwidth in schools to ensure digital delivery of these assessments; and (3) provide the resources and training that staff need to administer these online assessments effectively and efficiently. Management performance metrics will include the number of BIE-funded schools that have computers, software bandwidth, and staff to effectively administer 21st century academic assessments.

2. Reform Area One: Aligning Budget to Support Self-Determination

In order to support the BIE's efforts to promote tribal control over schools, the Study Group proposes that DOI request and increase in tribal grant and contract support costs for tribally controlled grant schools in its 2016 budget request. The Indian Affairs 2015 budget request for grant support costs for schools is \$48.2M, the same as the 2014 operating plan level. According to the DOI 2014 Budget Justification, \$48.2M "will fund approximately 67 percent of the need" of tribally run BIE funded schools.³⁰ During tribal listening sessions and consultations,

³⁰ Dept. of the Interior, Indian Affairs, Budget Justifications, Fiscal Year 2014, at p. IA-BIE-2 & IA-BIE-3, available at <http://bia.gov/cs/groups/xocfo/documents/text/idc1-021730.pdf>.

numerous tribal leaders and other BIE school officials at tribally controlled schools explained how the shortfall impacts their schools and stated they were using instructional funds to pay for administrative and operational costs as schools.

The Study Group believes that this shortfall is a major obstacle to tribal operation of BIE funded schools and a major deterrent for tribes considering assuming operations over BIE run schools. Grant and contract support cost funds are expended on administrative overhead costs for schools including business operations, payroll, personnel, annual audits, information technology, and reporting. During tribal consultation and listening sessions, principals and tribes reported that the shortfall forces schools to use funding from their base instructional budget to pay for administrative costs which, in turn, reduces the amount of funds available for classroom instruction.

The Study Group believes that the best ideas with respect to Indian education do not originate in Washington, DC. At the same time, the Study Group also believes that the BIE is in a position to (1) see which programs are working well for BIE-funded schools across the country, (2) make connections between successful tribes and those that are struggling; and (3) share best practices. Mindful of the principles of tribal self-determination, the Study Group knows that it would be inappropriate and wholly inconsistent with tribal sovereignty for BIE to mandate tribally controlled schools adopt any “best practice,” as determined by BIE. At the same time, given that BIE’s unique position in relation to tribally run schools, BIE may identify programs being implemented by other tribes with successful outcomes. The Study Group therefore recommends the BIE offer funding incentives for tribes that choose to voluntarily adopt and implement BIE identified best practices that are currently being implemented by other BIE-funded schools or another schools system.

The Study Group believes that it is critical for DOI to have funding to offer these incentives to tribally run schools. With that funding, the Study Group recommends DOI consider adapting the successful, competitive grants approach currently being used by the U.S. Department of Education as models. Such a competitive grant would target resources to help tribes align tribal educational priorities to President Obama’s education reform agenda to improve student outcomes and ensure all BIE students are college and career ready. Performance metrics for the incentive grant could include student and teacher attendance rates, graduation rates, college enrollment rates, measures on educator accountability, and performance on standardized assessments.

2. Reform Area 2: Aligning Budget to Support Effective Teachers and Principals

The investments in infrastructure and broadband described above would help recruit and retain effective teachers and principals to BIE-funded schools (e.g., the provision of teacher housing and professional development delivered online). The Study Group believes that it is also critical to grant the BIE necessary funding to provide additional incentives to recruit effective teachers and principals. For instance, the Group recommends providing the BIE with the funding capacity to provide housing stipends, loan forgiveness, and educational benefits would make BIE-funded schools a more attractive place to work. In addition, the Group suggests that DOI

also invest in posting available positions at BIE-operated schools on the USAJOBS website.

Nonetheless, even with these benefits, due to the extreme geographic isolation of these schools, it is critical to invest in upgrading the skills of existing staff. The Study Group would recommend that BIE should have the budgetary capacity to provide high-quality professional development to staff in tribally operated and BIE operated schools—for instance, support for National Board Certification of teachers—would help the BIE make progress towards achieving its goals.

3. Reform Area 4: Aligning Budget to Create an Agile Organizational Structure

Congress appropriates a significant amount of money to the BIE each fiscal year,³¹ but this funding cannot be leveraged to the maximum extent in driving reforms because: (1) the vast majority of this funding is formula-based; and (2) other entities, including BIA and the DAS-M's office, have significant control over its execution. Furthermore, ED provides \$200M in funding to DOI, and those funding streams are also fragmented. The Study Group believes that one way to reduce this budgetary fragmentation, would be to address the issue in future BIE budgets by providing the BIE with flexibility to control over how its own budget is executed. An alternative model would be the DODEA budget structure, which receives one appropriation from Congress (*e.g.*, DODEA does not receive any funding from other agencies nor do other offices within DOD control how DODEA's funding is used). This integrated budget structure provides the Director of DODEA with a sufficient amount of discretion to ability to set educational priorities for the entire school system.

Similarly, a more integrated budget structure would enable the BIE Director to be more responsive to changing circumstances and better equipped to meet the unique needs of diverse tribes and schools on a case-by-case basis. The Study Group believes that eliminating the multiple players that control various aspects of BIE's budget would free BIE from unnecessary bureaucracy, provide for flexibility and, in turn, help support the creation of a more agile organizational environment.

Finally, for each of the investments proposed by the Study Group, the Group recommends that BIE monitor progress through the adoption of performance metrics and conduct evaluations to identify effective strategies for continued investment.

³¹According to a study conducted by BIE staff in 2011, the per pupil expenditure for BIE's K-12 day schools was approximately \$13,116, and \$15,550 for its boarding schools. Much of BIE's remaining budget is used to fund non-K-12 programs, including funding for 32 tribal colleges and universities (\$89M), operations at eleven dormitories (\$24.5M), and a scholarship program for American Indian youth (\$32M).

VI. Conclusion

The foregoing proposals are underpinned by a fundamental belief that all students, especially American Indian students attending BIE schools, can learn. Accepting anything less says nothing about these students, but rather speaks volumes about a failure of leadership and political will. Every child can learn; every school can succeed. Challenging educational circumstances, however, require vision, uncompromising values, conviction, and the courage to make difficult decisions, especially when redesigning a broken institution. Challenging circumstances present opportunities: an opportunity to unleash untapped potential; to be bold; to solve a problem previous generations refused to tackle. That is the challenge the BIE presents to us today.

APPENDIX A

Participants at Listening Sessions and Tribal Consultations

Last Name	First Name	Title	Organization
Aaron	Michael	Superintendent	Muckleshoot Tribal School
Abeita	Fernando	Council member	Isleta Tribal Council
Abeita	James	Council member	Isleta Tribal Council
Abeita	Juan Rey	Council member	Isleta Tribal Council
Aceveda	Casemro		
Acosta	Geneva	School Board Member	Tohono O'odham Nation
Adson	Lemuel	Superintendent	Shonto Prep School
Allery	Aaron		Gila Crossing Community School National Congress of American Indians
Alvares	Cesar		
Anderson	Greg	Superintendent	Eufala Dormitory
Antone	Phyllis		Gila River Education
Antone	Cynthia	Tribal Council Member	Gila River
Antone	Priscilla		Gila Community Crossing School
Archambault	Dave		Standing Rock Sioux Tribe
Archambault	Sunshine		Standing Rock Sioux Tribe
Arviso	Emily	Education Specialist	Bureau of Indian Education
Ashley	John	Assist. Director-Office of Information	Bureau of Indian Affairs
Ashley	Martina		Casa Blanca Community School
Barehand	Dora		Gila River Community School
Basnau	Rick	Director	Chief Leschi School
Baum	Dawn		Office of the Solicitor
Begay	Edwin		Chooshgai Navajo Dine Bi Olta School Board Association, Inc.
Begay	Margie RS		
Begay	Cordella	Administration	
Begay	Catherine		Hotevilla Bacavi Community School
Begay	Michelle	Program Specialist	Bureau of Indian Education
Begaye	Irene		Black Mesa Community School
Begiasiuua	Dr. Noreen	Director	Tribal Education Department
Belone	Phil		Navajo Nation
Benally	Jacqueline	Executive Director	Many Farms Community School
Benally	Tim		Navajo Nation

Benjamin	Joyce Flournoy	Teacher	Isleta Pueblo Elementary
Benneman	Charlene	Human Resources	Blackwater Community School
Big	Rosemary		Gila Crossing Community School
Birdletter	Lydia	Tribal Education	Oglala Sioux
Biscoe	Catherine Belinda	Director	University of Oklahoma
Bixby	Norma	Tribal Education	
Blue Earth	Emersen		Standing Rock Community School
BlueEyes	Faye		Dzilth-Na-O-dith-hle-School
Bohanon	Joseph	Consultant	Muskogee, Ok
Bordeaux	Deborah	Principal	Loneman School
Bough	Brian	Education Specialist Cheyenne River Sioux Tribal Education Agency	Bureau of Indian Education
Bowler	Connie		
Bradford	Jim		Pine Ridge
Bradley	Jacque		Blanca Community School
Brady	Bob	Associate Director	Human Resources Team
Brave Eagle	Dayna	Director	Tribal Education Department
Bravo	Robert		Hualapai
Brawr	Elma		St. Stephens WY
Breuer	Jody		Lakota Sioux
Brewer	Jodie	Program Specialist	Bureau of Indian Education
Brewer	Bryan	Oglala Sioux Tribal President	
Bundy	Dr. Michael	Superintendent	Two Eagle River School
Butler	Edwina	Governor	Shawnee, Ok
Byrnes	Erin	Partner	Udall Law Firm
Campa	Lucie		Bureau of Indian Education
Campbell	Katherine	Education Specialist	Bureau of Indian Education
Campbell	Matt	Tribal Education	
Cardenas	Freddie	Principal	Jemez Day School
Castillo	Shawna		
Cedar Face	Francis	Union Steward	Pine Ridge High School
Chapin	Jake		Pyramid Lake
Chavez	Everett		Navajo Nation
Chavez	Ruby	Teacher	Isleta Pueblo Elementary
Chavez	Ervin		Dzilth-Na-O-dith-hle-School
Chelsea	Mike	Teacher	Pine Ridge High School
Chimoni	Emelda	Teacher	Isleta Pueblo Elementary
Claymore	John	Superintendent	Quileute Tribal School
Coffland	Don	Principal	Tuba City Boarding School
Coin	Leora	School Board	Second Mesa Day School

Conroy	Bradley		Pine Ridge School
Cook	Robert	Teach for America	
Craddock	Steven		
Cumming	Harley	Chairperson Oglala Sioux Tribe Education Chair	Oglala Sioux
Cummings	Charlie		
Curley	Ray		Little Singer Community School
Curran	Jim	Teach for America	
David	Jerry	Chief of Logistics	
Davis	Rosie	Associate Deputy Director	Bureau of Indian Education
Dawasema	Donald		
Dawasema	Madonna		Hopi Tribe
Dearman	Tony L.	Superintendent	Riverside Indian School
Dee	Chester		Navajo Nation
Delome	Betrice	OST Legal Dept.	
Dorpat	Norm	Director	Chief Leschi School
Dorsett	Teresa	Director	Cheyenne Arapahoe
Dosahue	Leon		Pine Ridge
Dunn	Steve		Chickasaw
Duran	Shawn		Taos Pueblo
	Patrick	Asst. Associate Director of Ed.	Academic Accountability Team
Dworakowski	Donna	Education Line Officer	Bureau of Indian Education
Eaglestaff	Nadine	Superintendent	Tiospa Zina Tribal School
Eastman	Melissa	Special Assistant	Chickasaw Nation
Edgar	Tom		
Elkin	Emerson	Supervisory Civil Engineer	Bureau of Indian Affairs
Eskeets	Derid	RST-TFA	
Espinoza	Anthony		Little Wound School
Fapans	Debra		Las Vegas Paiute Tribe
Faria		Cheyenne River Sioux Tribe Agency Education	
Farlo	Dr. Cherje		
Fatheree	Catherine	Education Line Officer	Bureau of Indian Education
Fingston	Cindy	Court Reporter	
Fitzgerald	Marilee	(Former) Director	U.S. Department of Defense
Floyd	Kay	Oklahoma State Legislature	Oklahoma City, Ok
Flyingman	Franda	Supervisory Program Analyst	Bureau of Indian Education
Fohrenkan	Robin		Gila Crossing Community School
Foreman	Sherri		Muckleshoot Tribal School
Fourier	Paula		Little Wound
Fred	Rebecca		Moencopi Day School

Fritzler	Charitina	First People's Center for Education	
Fyant	Shelly		Salish &Kootenai
Garro	Myra	Teacher	Isleta Pueblo Elementary
Germany	David		Mississippi Choctaw
Gibbons	Lynn	Tribal Education	Oglala Sioux
Gilman	Glenn		Hopi High School
Godinez	Lucinda		Greasewood Spring Community School
Gonzales	Theresa	Teacher	Isleta Pueblo Elementary
Gonzalez	Ruben		Gila Crossing Community School
Gregores	Wendy	Council member	Isleta Pueblo
Gregory	Orena		Sac & Fox Nation
Gross	Shirley	Administrator	Pierre Indian Learning Center
Gulibert	Felicia	Principal	Santa Fe Indian School
Haarstad	Erick		Salt River Elementary School
Haas	John		
Hacker	Bob	Oglala Sioux Tribe Education Coordinator	
Hale	Jonathan	Member Navajo Nation	Navajo Nation
Hamley	Jeff	Associate Deputy Director	Bureau of Indian Education
Harjo	Lucyann	Indian Ed. Coordinator	Norman Public Schools
Hartman	Tracy	Director	Eastern Oklahoma Tribal Schools
Hastings	Jim	Education Line Officer	Arizona South
Hawkes	Michael	Executive Director	Alamo Navajo School Board, Inc.
Hejtmanek	Mike	Superintendent	St. Stephens Indian School
Hence	Bernadette	White House Intern	
Herrera	Roy	Superintendent	Santa Fe Indian School
Hettich	Tom	Director/Human Resources	Bureau of Indian Education
Haas	Cecelia	Oglala Sioux Tribe	
Honahni	Dan	Tribal Council Member	Hopi Tribe
Honanie	Doris		Hopi-Moencopi Day
Hughes	Michael	Consultant on Indian Affairs	
Humetewa	Howard		Pueblo of Santa Ana
Hunter	Sharon	Federal Programs Coordinator	Riverside Indian School
Jackson	Dr. Mark		Quileute Tribal School
Jaime	Leticia	School Board Member	Quileute Tribal School
Jaramillo	Cynthia	Council member	Isleta Tribal Council
Jaramillo	Larry	Vice-President	Isleta Tribal Council
Jewell	Sally	Secretary	U.S. Department of the Interior

Jiron	Douglas	Council member	Isleta Tribal Council
Jiron	Phillip	Council member	Isleta Tribal Council
Johansen	David	Chief, Special Education	
Johnson	Wayne	Tribal Education	
Johnson	Lynn	Regional Solicitor's Office	
Johnson	Victoria	Teacher	Isleta Pueblo Elementary
Johnson	Manuel	Intergovt. Liaison	Gila River
Johnson	Sherry	Director	Sisseton Wahpeton
Johnstan	Tyson		Quinault
Jojola	Denise	Teacher	Isleta Pueblo Elementary
Jojola	Geraldine	Tribal Education Department	Isleta Pueblo
Jones	Genevieve		Big Pine Paiute Tribe
Jose	Verlon		Tohono Oldham Nation
Juan	Marjorie M.	BIE Boarding School Chief -- Office of Facilities Management and Construction	Tohono Oldham Nation
Keel	Dale		Bureau Indian Affairs
Keel	Jefferson		
King	Carmen	Teacher	Isleta Pueblo Elementary
King	Gaye Leia	Education Specialist	Bureau of Indian Education
Kinnison	Akilah		Hobbs Straus Dean & Walker
Kip	Penny	Chairperson	Two Eagle River School
Kitsopoulos	Gloria Coats	Superintendent	American Horse School
Knight	Patricia		Duckwater
Krech	Sandra		Gila Crossing Community School
LaPlante	Mike		Bureau of Indian Affairs
Laurkie	Richard	Governor	Laguna Pueblo
Lawton	Ray	Superintendent	Chief Leschi School
Lee	Deborah	Program Support	Bureau of Indian Education
Lente	Michael Allen	President	Isleta Tribal Council
Lessensl	Rior		
Lewis	Stephen	Lt. Governor	Gila River Indian School
Little	Eanie		
Little	Justin		Loneman School
Little Axe	Troy		Modoc
Little Singer	Leo John		
Little Singer	Etta Shirley		
Logan	Leilla		Winnebago Tribal Health
Lolnitz	Darlene		Koyukuk Tribe
Lomahaftewa	Gloria		Second Mesa Day School
Lomahaftewa	Jolene		Second Mesa Day School

Lomtv	Leo		Chickasaw Nation
Longie	Joel	Academic Achievement	Bureau of Indian Education
Lopez	Julia		San Simon School
Lords	Eric	Principal	Shoshone-Bannock Tribal School
Lovin	Brenda	Assistant Principal	WaHeLut Tribal School
Lucas	Lucy		Hopi Tribe
Lucero	Joseph	Council member	Isleta Pueblo
Lunderman	Richard "Tuffy"	Tribal Council	Rosebud Tribal Education
Lyan	Michelle	Teacher	Isleta Pueblo Elementary
Macias	Esther	Education Specialist	Bureau of Indian Education
Malo	Rachel		Chooshgai Community School
Marquez	Fernando		Gila Crossing Community School
Martinez	Elizabeth	Teacher	Isleta Pueblo Elementary
Martinez	Racheal	Assistant Principal	To'Hajiilee Community School
McArthur	Hank Edmo	Operations Manager	Shoshone Bannock Tribal School
McIntire	Chris		Salt River Pima
McIntosh	John L.	Education Line Officer	Navajo Region
Mendoza	Gregory	Governor	Gila River Community
Mendoza	William	Executive Director	U.S. Department of Education
		Oglala Sioux Tribe-	
Merdenian	Tina	President's Office	
Mike	Jeffrey		Pinon Community School
Mitsel	Mikayla		Oglala Sioux Tribe Education Agency
Miyasato	Mona	Acting Principal	Pine Ridge High School
Molina	Mario	Director	Gila River Indian Community
Monroe	Elsie		Leupp Schools, Inc.
Moore	Henry	Tribal Council Member	Arizona
Moore	Jacob	Inter-Tribal Council	Arizona
Moore	Patrick	Principal	Riverside Indian School
Morehead	Jellene		Sac and Fox Nation
Morris	Kay	Principal	Laguna Elementary School
Morrison	Anthony	Assistant Principal	Second Mesa Day School
Nelson	Danielle		Pine Ridge Line Office
Nelson	Dan		
Nelson	Steve		Education Northwest
Nez	David	Principal	Santa Clara Day School
Nez	Victoria		Black Mesa Community School
Nite	Jerome	Retired	Bureau of Indian Affairs
Norris	Debora	Department of Education	Arizona State
North	Eric	Education Line Officer	Bureau of Indian Education
Nuttle	William	Program Specialist	Bureau of Indian Education

Old Chief Olsen	Bill Eric	Chief Financial Officer	Blackfeet Nation Santa Fe Indian School
Oosahwee Otero Ouco Pablo Pablo Padilla Palmateer- Holder	Sedelta Katie Karen Christina Winfred Josephine Lynn	Associate Director Teacher Coordinator Council Member Tribal Leader	White House Initiative AI/AN Education Isleta Pueblo Elementary Gila Crossing Community School Gila Crossing Community School Isleta Tribal Council Coville Tribe
Pankovits Parker Parton Pauley Pedro Perkins Pickering Pieper-Jordan Pino Plummer Poououma Power Provost Quimayousie Ramirez Raymond Record Redbird Reedy Reimer-Edef Reinhardt Roanhorse	Tressa Allan Terry Linda Anita Danielle Dwight Seanna Henry George Melvin Jacquelyn Irving Cheryl Renee Tom Caryn Ernest Patricia Constance Marty Maxine	President School Board Member School Board Department of Education School Board Member Superintendent Oglala Sioux Tribe Associate Deputy Director Indian Education Coordinator School Board Member Regional Solicitor's Office Professor Dineyazhe	Awanuiavapgs Wichita & Affiliated Tribes U.S. Dept. of Education Auburn, WA ShoBan School Oklahoma Blackwater Community School Navajo Nation Moencopi Day School Blackwater Community School Bureau of Indian Education Hopi Tribe Moore Public School Riverside Indian School Tanana Chiefs Conference-Alaska Santa Rosa Day School Tanana Chiefs Conference Vice President
Roberts Hystop Rodin	Julie Jenni	Oglala Lakota College-Dev. Ed. Dept., Office of Facilities Management and Construction Director	
Rodriguez RomanNose	Dennis		Bureau of Indian Affairs Tribal Education Departments

	Quinton		National Assembly
Rose	Jolyn	Principal	Sequoyah High School
Ross	Margaret	Oglala Sioux Tribe Member/educator Director –Information Resources	
Rousseau	Anthony		Bureau of Indian Affairs
Rullianus	Georgeous		
Sakiestewa	Norma		Hopi Tribe
Saladera	Kevin	K-12 Coordinator	Pine Ridge High School
Salyers	Denise	NASIS	Bureau of Indian Education
Sam	Walt		
Sanchez	Virginia		Duckwater Shoshone
Sanchez	Barbara	Council Member	Isleta Pueblo Council
Sandoval	Patricia	School Administrator	Santa Fe Indian School
Sandoval	Yolanda	Parent	Navajo Nation
Sauer	Linda		Gila River Indian Community
Sauve	Michalle	Administration for Children & Families	
Scott	George		Government Accountability Office
Scribner	Zach		Chickasaw Nation
Secakuyva	Corey		Hopi tribe
Segrove	Michael	Planner	Eastern Oklahoma Tribal Schools
Seworestewa	Alden		Hopi-Moencopi Day
Shaw	Claudia	Chief Financial Officer, Comptroller	
Shaw	Lesa B.	Projects	Absentee Shawnee Tribe
Shendo	Kevin		Pueblo of Jemez
Shirley	Etta	Principal	Little Singer School
Silas	George		Hopi
Sinquah	Alma		Second Mesa Day School
Sly	Gloria	Education Liaison	Cherokee Nation
Smith	Grace	Teacher	Edmond Public School
Sovo	Casey	Education Line Officer	Bureau of Indian Education
Spoon	Tresh	Director of Education	Absentee Shawnee Tribe
Starr	Goldie		
Stevens	Bart	Associate Deputy Director	Bureau of Indian Education
Stevens	Joan	Parent	
Tah	Andrew	Superintendent	Navajo
Tahy	Emery		Arizona State University
Taken Alive	Jesse		Standing Rock Sioux Tribe
Talayumtewa	David	Education Line Officer	Bureau of Indian Education

Talley	Nikki		WIHAIANE
Tapija	Emma		Hualapai
Taylor	April		Chickasaw Nation
Tehraar	Rita	Special Education Team	
Teller	Verna	Secretary	Isleta Tribal Council
Tepp	Rose		
Tewa	Marilyn	Tribal Council	Hopi Tribe
Thomas	Dr. John L.		
Thompson	Patricia		Bureau of Indian Education
Thompson	Patti		
Thunder	Adrienne	Tribal Education	
Tinnt	Jason	Oglala Lakota College STEM	
Tokeinna	Robert		Native Village of Wales
Topash	Tom		Pokagon Band Potawatomi
Torres	E. Paul	Governor	Isleta Pueblo
Trahan	Rodney		Sioux Tribe
Trottier	Neal	Principal	To'Hajiilee Community School
Tso	Matthew	Legislative Analyst	Navajo Nation
Tsosie	Katleen		Cove Day School
Tsotigh	Jacob	Technical Assistance Co.	
Tyen	Barbra		Loneman School
Valentine	Rebecca		Santa Rosa Ranch School
Valenzuda	Patricia		Gila River Indian Community
Walker	Bill	Regional Director	Bureau of Indian Affairs
Wauwow	Loretta		
Weatherly	Jim		Jamestown S'klallam
Webster	Catherine	Administrative Support	Bureau of Indian Education
Wells	Danny	Executive Officer	Chickasaw Nation
West	Mark	Acting Principal	Pine Ridge High School
White	Kalvin	Director	Navajo School Board
White Crust	Frankie	SIG Coordinator	Pine Ridge High School
White Eagle	Robert		Oglala Lakota
Whitebear	Ronald		Winnebago Tribal Health
		Acting Education Line	
Whiteeyes	Robert	Officer	Bureau of Indian Education
Whitehorse	Brenda	Principal	Aneth Community School
Whitford	Harvey	Principal	Wa He Lut Tribal School
Williams	Marie	Special Education	Little Singer School
Williamson	Jeff		Gila River Community School
Wilson	Ryan		Oglala Lakota
October	Manuella		Casa Blanca Community School

Witherspoon	Dwight		
Wohnson	Rondi		Karuk Tribe
Wright	Kara		S'Kiallam Tribe
Yatsattie	Charlene	Teacher	Isleta Pueblo Elementary
Yazzie	Emma		Leupp Schools, Inc.
Yazzie	Lorraine		Black Mesa Community School
Yazzie	Rena	Education Line Officer	Bureau of Indian Education
Yellowfish	Sydna	Director	Edmond Public School
Yepa	Gloria	Supervisory Ed. Specialist	Bureau of Indian Education
Young	Cynthia		

APPENDIX B

Illustrative Comments from Tribal Leaders and Other BIE Stakeholders During Study Group Listening Sessions and Tribal Consultations

Reform Area 1: Highly Effective Teachers and Leaders

Just some challenges that I want to let you know what we deal with. [H]iring is a huge issue. [U]ntil we get HR under our belt or underneath our umbrellas, it's always going to be an issue. When we go to hire teachers and we're dealing with it right now, they can be certified in the State of Oklahoma but they can't BIE's requirement, then we lose them. Right now we're trying to hire a Spanish teacher that can go anywhere in the State of Oklahoma and teach but she doesn't meet qualifications of the BIE. *Tony Dearman, Superintendent Riverside Schools (Anadarko Tribal Consultation)*

Why don't we have teachers, counselors, principals, superintendents, and all the other maintenance workers and those things wanting to come here? Why can't we recruit these people to come here? Well, they're not going to come here just because we tell them we love them. They're going to come here and work because we pay them a competitive wage and we've got to teach them a trade and respect them for what they do when they get here. *Jefferson Keel, Lieutenant Governor of the Chickasaw Nation (former President of the National Congress of American Indians) (Anadarko Tribal Consultation)*

Housing for teachers is very inadequate. As a result, Northern Cheyenne cannot get and keep qualified teachers. The teachers have to travel from Billings, which is far away, and if there is inclement weather than there may not be class that day. Housing is a priority that needs to be addressed. *Northern Cheyenne Nation via Quinton Roman Nose, Executive Director, Tribal Education Departments National Assembly (TEDNA)*

We need well-trained administrators and teachers and staff. The only way to get that is offer salaries that are higher, provide some kind of housing assistance to get there. Where I am, we have teachers driving 160 miles a day to get to school. If they get offered jobs in their hometown, I know we're going to lose them. *Mark Jacobson, Principal and Acting Superintendent, Quileute Tribal School (Auburn Tribal Consultation)*

They have been trying to get new school for a long time. The current building does not have sufficient heating, it leaks, and there is a roof issue. Children have to wear their coats in class in the winter. Leech Lake is supposed to be a high priority, but nothing has come of it yet. This needs to be addressed. *Leech Lake Band of Ojibwe via Quinton Roman Nose, Executive Director, TEDNA*

Offer all teachers a grant to become board certified (free whether they pass or not) *Bradley Budinger*

But one of the things we notice is that we can't get teachers to stay. They come and we have even had some drive through the parking lot and go and leave. Right? And they've already had a

signed contract. *Michael Hawk, Executive Director, Alamo Navajo School Board (Gila River, Arizona Consultation)*

If you're not educating your local people you're not going to ever fill all those slots. It's impossible. You don't have the capacity or the population to do that with all the openings, at least in Navajo country. I'm sure other tribes are the same. *Michael Hawk, Executive Director, Alamo Navajo School Board*

One of the things we've done in Alamo, we've had teachers come through that we have recruited and it's very hard work. We are isolated by 62 miles of nowhere. And one of the things that we have done is provided incentives because we have broadband, we have infrastructure, we have those types of things. We have upgraded the school to make it less institutionalized and more receptive for the children that come to school. It's a learning environment. *Michael Hawk, Executive Director, Alamo Navajo School Board, (Gila River, Arizona Consultation)*

The 2014 operating plan that BIA central office put together provides only \$169,000 for teacher pay for the schools. So that's only 7.8 percent of the amount that's needed to adequately fund teacher pay to retain quality -- attract and retain quality teachers, so that has to be looked at. That's not good. *Michael Hughes (Gila River Consultation)*

But we also need to make sure that we have the proper tools and materials for our teachers to -- because the community I come from, housing is really difficult for people coming in, so we can retain them at the schools. We have about 90 houses but 50 of them are just not liveable. And so it just leaves us the few that are out there that we are trying to renovate. It's very hard to do that as well because these are homes that were probably there back in the 30s or, you know -- yes, they have asbestos that you have to do and it's very expensive to demo those places. And so we try to retain our teachers and when we ask them to come out to live on the reservation and to try to fight the dirt and the wind just like the gentleman said. And so you know, in our homes we try to fight that as well. They are falling apart as we speak. So I want to see if there's certain restrictions that we can eliminate, so we can bring home and bring in good teachers and effective, highly qualified teachers and just this year I had -- this gentleman said someone came to see the campus and they drive in and turn around and left. It's the same thing happened to me. They saw the housing and said no, thank you, and they left... And teachers are really hard to find. Our SPED teachers are very hard to find. Nurses are hard to find. I had to, you know, try to talk them into staying... Sometime they stay for a couple of months and then they can't handle it. *Jacqueline Benally, Many Farms Community School (Gila River Tribal Consultation)*

Additionally, when President Carter enacted the Civil Service Reform Act of 1978 he eliminated the retirement system for Bureau-funded schools. So we are on the 401k plan which really hurts us. The reason it hurts us is because we are competing with the Arizona Retirement System, and so when teachers want to come out to Hopi High think say, what kind of retirement do you have? We don't. It's all self-funded. And so I would recommend then to the federal government that we look at reinstating the pension plan for teachers and administrators for zero funded schools. It would help a lot in our recruiting efforts. *Glenn Gilman, Principal, Hopi High School (Gila River Tribal Consultation)*

One of the things that I would tell you that I would dearly love to see is a leadership academy for administrators and principals and those people who are coming into the BIE system like myself. I had to totally learn alone. *Michael Bundy, Superintendent, Two Eagle River School (Auburn Tribal Consultation)*

There should be a training program for new superintendents, new principals that come to BIE schools, because it's the blind leading the blind. We're just doing what we think is best and trying to muddle through as best we can. I have no idea or had no idea what reports were due or when they were due or anything like that. And you get that call when you're going to lose your funding by March 31st unless this report is done. What report? *Mark Jacobson, Principal and Acting Superintendent, Quileute Tribal School (Auburn Tribal Consultation)*

Since Native students travel between the public, BIE, charter, and tribal contracted or grant schools in their communities, the BIE should work with local non-BIE school systems, tribes, and their education agencies to ensure school calendars, professional development, and CCSS curriculum implementation support one another and provide consistency for Native students. *National Congress of American Indians and National Indian Education Association*

The Study Group should also provide concrete steps, such as offering premium pay and housing, or preparing local tribal citizens to teach, in order to assist schools having trouble recruiting and retaining experienced teachers and administrators. *National Congress of American Indians and National Indian Education Association*

Reform Area 2: Agile Organizational Environment

I really, truly appreciate the upfront points on the bureaucracy. Because tribal schools have historically followed the same organizational structure of top down management, top down decision making. And that needs to change. *Lynn Palmanteer-Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)*

We as Schools report to our ELO, to our ADD West Director, and to the DPA. In the course of a week there are usually one to two reports due. I usually work on my reports from 5am to 6am so that I have some time to go into the classroom. Reports in Native Star, which is many, also NASIS requirements, Annual/Academic reports, Special Education reports, Finance Reports, HR Paper Work always needed, etc. and the list goes on. I only have 79 students, however I work on reports usually from 5 to 6 am as stated before and then at least another hour at work. Oh, I forgot quarterly budget reports. A major problem with being a Principal is you are more a manager and data entry administrator vs. a leader in the educational system (LEARNING). Along with these reports, the requirements in Safety, going Green, etc. come into play. If you factor in all the teleconference meetings or meetings that require one to go to the BIE Office most of the day is covered with requirements towards federal policies instead of ensuring learning is going on in the classroom. *Gary Tripp, Principal, T'siya Day School*

Currently, teachers have been cut from using copy paper. Pencils, sharpeners and other materials are so inferior they break constantly. Teaching positions are unfilled. And, wireless Internet goes unused without wireless computers to use them on (all most all computers hadn't had wireless

cards installed when wireless networks were made available). *Bradley Budinger*

It is critical to remember without resolving the facility funding issue, the schools in the north will have to shut down in March because there will be no funds to pay electric, phone or heating bills! This funding is appropriated by Congress to the schools to be used specifically for the above bills but is being constrained by BIA Facility Management Offices! AHS is not asking for extra funding (even through the SIG allowed us to hire 7 more teachers and raise our academic scores), we only are asking for what Congress has already approved for our school – 100 percent facility funding, 100 percent administration cost funding and federal healthcare for our school employees. The cuts in the facility and admin costs have to be made up with the students ISEP funding which is supposed to be used to hire instructional staff and purchase curriculum and resources for our students. *Gloria Coats-Kitsopoulos, School Superintendent, American Horse School*

[Human resources] has many problems, the biggest is unqualified staff. People are unprofessional, never return phone calls, emails and mailed or expressed mail correspondence, everything takes months to accomplish, and if qualified people worked in [human resources] I believe processes would function faster and more efficient. I constantly have to resend documents repeatedly, which is a waste of time and material. To bring on a new staff it takes a minimum of three months, not conducive if you're trying to run a school. Still using a DOS based program called FPPS, not tied into FBMS or Quicktime, having to use multiple systems is a waste of time and money. *Sydney Gates, Business Technician San Ildefonso Day School*

Acquisitions is a major disaster, four years later we still have the same issues with no resolve – The DOI should have an ongoing data base of approved vendors for which we can pull, again the business tech's have to be well rounded in purchasing IT equipment, textbooks, instructional material, facilities and operations, again we should only be the processors. Utilize the experts to make special purchases not the [business technicians]. We are business people, not IT or teachers. Often time we are responsible in finding Speech therapist and creating documents to meet acquisitions requirements. Professional staff should be researching therapists, IT equipment etc. The [business technicians] have to research and find qualified vendors to meet the mission of the principal and IT and other areas of school function with very little tools and knowledge. The [business technicians] finds and procures the contractor, creates the requisition, processes the requisition, pays for the requisition, adjusts costs in FBMS if necessary no separation of duties. Where are the internal controls? *Sydney Gates, Business Technician San Ildefonso Day School*

The Bureau funded schools struggle with knowing which acronym to go to for assistance when they need help. Often when in need of help with facility issues the schools will go to the BIA and are told to go to the BIE and the BIE will state they have to wait for the BIA or OFMC before they can help. When help is needed with other issues there is no clear directions given as to which acronym to go to for help. Very often reservations or geographic areas are played against each other. *Deborah Bordeaux, former Principal of Loneman School*

When it comes to reports, there's so many more reports and things and almost like duplication that the BIE is requiring. Let me give you a good example. School improvement, you have your school improvement plans. And I was doing that. At the same time, I'm doing what the state of

Montana is requiring. We're an accredited school, and we were getting in trouble for accreditation. How come? You're missing school improvement reports. So I'm supposed to be doing school improvement to the state of Montana. At the same time, I have got school improvement reports that are going out to BIE. Totally different creatures. *Michael Bundy, Superintendent, Two Eagle River School (Auburn Tribal Consultation)*

The education system within the BIE in my estimate needs a great deal of changes or improvements. Let me start by talking about the difficulties a school has with Human Resources. It is very difficult to get someone hired or even get volunteer assistance in the Schools. I believe it takes 2 to 3 months to run someone through the whole process (with ever going new paper work and changes) and get a teacher to come into the school. HR is their own identity, and therefore employees answer to a supervisor instead of a Superintendent or Bart Stevens, the ADD West Supervisor. HR really needs to be under the control of ADD west.

Food contracts are not negotiable? Currently the contract with Sysco has been renewed, but the prices are higher than some other food vendors. Why does BIA keep this vendor? Other vendors also have a better variety and quality of food. Another thing with the Sysco accounts, we have no point of contact to speak with regarding the contract or invoices being posted. The contract amount that is on the UDO reports that we receive are not correct. The invoices are being charged to the wrong "line" so now it shows that we are in the negative. *Nona J. Narango, Business Technician, Santa Clara Day School*

The Tribe has been waiting for years, literally years, for an inspection to be conducted by the BIE Albuquerque Office to finalize occupancy permits. The Albuquerque office has still not come out to do the necessary inspections to finalize the permits. This and other inefficiencies need to be corrected. *Sault Ste. Marie Tribe of Chippewa Indians via Quinton Roman Nose, Executive Director, TEDNA*

BIE has not yet released the standardized test scores to the Schools. These scores are essential determined if AYP was met, and BIE needs to release those scores as soon as possible. *Quinton Roman Nose, Executive Director, TEDNA*

Alternative AYP -- ED and DOI have never provided a final response to the efforts being made to develop and Alternative AYP by several schools. *Deborah Bordeaux, former principal Loneman School*

I had the honor of working at a unique school, Cheyenne-Eagle Butte. Since it is part public through the state of South Dakota and part BIE (operated) under a collaborative agreement, that school is probably the only school that received an AYP status from two entities. Three years ago the school received a "made AYP" status from the state of South Dakota and a "didn't make AYP status from the BIE for the same exact students, same exact accountability plan that really belonged to the BIE. I sent an appeal and tried to argue the point with BIE, but my argument was too logical and I simply asked, "Why wouldn't the BIE want to use the Accountability Plan correctly to determine AYP and have more of their schools make AYP?" Now, we are at another impasse with the new online testing. *Nadine Eastman, Superintendent, Tiospa Zina Tribal School*

One thing I would like to say that I haven't heard is the question, have we satisfied the GAO Report and address the issues in the Bronner Report. I think we have, with the presentation this morning... I think we have addressed those issues so I think we're going forward with that. *Greg Anderson, Superintendent of the Muskogee Creek Nation Dormitory (Anadarko Tribal Consultation)*

I agree and support the Centers of Excellence, but we need to start educating a new wave of Native American teachers because right now we have very few Native American teachers, very few community teachers that we have. *Lieutenant Governor Steven Lewis, Gila River Indian Community (Gila River Consultation)*

The BIA has a very, very bad practice of forcing people to submit data for reports that are just based on the idle curiosity of someone in the central office and nobody ever uses it and it's a huge waste of time. So you don't want to end up with that. *Michael Hughes (Gila River Tribal Consultation)*

One of the problems of moving forward is that the Bureau of Indian Affairs is not a full-fledged bureau. If you go to the Department of the Interior internet site.. and you click on "who we are," the Department of the Interior, and click on "organizational chart," you will see an organization chart for the Department of the Interior. And under the assistant secretary for Indian Affairs you will see Bureau of Indian Affairs but that there is no Bureau of Indian Education there. And people say, well, what happened to the BIE? I say, "there is no BIE." It's sort of a stepchild of the BIA that gets neglected and forgotten about most of the time. So one of the things that should be considered is the establishment of a real Bureau of Indian Education in the process of doing the 2016 budget. So what would that mean? Well, a real BIE would have its own annual budget justification, a reboot that some of you know about that's separate from the BIA... A real BIE would have its own administrative budget and staff who would be responsible for accounting, budget, contract and facility information technology and not have to go over to the BIA. *Michael Hughes (Gila River Consultation)*

We call Albuquerque. We don't get a correct answer. We can't reach anybody. We send an email to Billings, and then it goes to Albuquerque, and then it comes back through Billings, and then back to me again. It just makes it kind of frustrating. *Harvey Whitford, Principal, Wa He Lut Indian School (Auburn Tribal Consultation)*

One of the things I'm happy to see in the Report is that there appears to be pushing things out of the central office and more into the field with technical assistance. And I'm hoping that that technical assistance will also create either bureau offices, like our office or tribally created offices like our office, to give the schools the technical assistance they need to maintain the buildings. *Michael Segroves, Eastern Oklahoma Tribal Schools (Anadarko Tribal Consultation)*

Unfortunately, DOI continues to fail at including education experts and educators in key policy and budget decisions. As we work to find ways to increase the effectiveness of the BIE and improve the state of Native education, we must have people leading in Washington who understand the needs of our students and have the authority to drive successful reform. *National*

Reform Area 3: Promote Self-Determination

I want to give a suggestion that you add another pillar. It's not enough what you have down here [in the draft Report]. And to me it's unconscionable that you've left off what should have its own pillar, culturally based education and immersion schools. And I'm not talking about teaching our Native languages for one hour a day or for half an hour a day. What I'm talking about is immersion magnet demonstration schools within existing Bureau of Indian Education schools. This is something that's deserving of its own pillar. *Ryan Wilson, President, National Alliance to Save Native Languages (Pine Ridge Tribal Consultation)*

Just this past week I was at Carlisle Barracks in Carlisle, Pennsylvania [the first federal school for American Indian students]. I looked at the facilities and those kids -- in fact, the school there gave me a picture of the very first class that came from -- the students that came from Pine Ridge Reservation, and you look at those faces -- and they're very proud of this. But if you look at the faces of those children, of these kids, they're not proud to be there. In every picture you ever see of Indian schools during that era, you don't see any smiles. You don't see any acceptance. What you see are people -- are kids that have been trained to sit, act, a certain way for fear of a lot of things. *Jefferson Keel, Lieutenant Governor of the Chickasaw Nation (former President of the National Congress of American Indians) (Anadarko Tribal Consultation)*

I read the Study Group pillars, and I don't see any concrete recommendations that allow for self-determination. I don't see recommendations for waivers to NCLB rules and regulations or [tribal] alternatives to AYP... The United States Government must give free reign in determining and implementing our own educational programs. I think there's still time to do this, and I hope you will change your education pillar to reflect this official request, because I don't see anything in your study yet. *Jesse Taken Alive (Anadarko Tribal Consultation)*

Looking at the preliminary report, I've read it and I do appreciate the fact that the Study Group seemed to have listened and heard what we have said. So I look at the tribes having -- that capacity builds and helping with the capacity to operate these bureau-funded schools, because I do believe that we have those children's interest at heart and we know more about them at the local level than they do in Washington D.C. *Gloria Sly, President, Tribal Education Departments National Assembly (Anadarko Tribal Consultation)*

I appreciate the tribal leaders that are here because ultimately it starts at home... I've been to a lot of tribal education (inaudible), and I think until our tribes actually take ownership of [education], and say, we've got to get a head start, we've got to get a kindergarten, we've got to start reading programs in our homes, it's -- we're always going to have problems in our education system. *Tony Dearman, Superintendent of Riverside Schools (Anadarko Tribal Consultation)*

I'm Chickasaw and I grew up in Oklahoma and I grew up going to an Indian Health Service hospital, a couple of them. We lived in different places, but I grew up going to Indian Health Service hospitals. About the time I went off to law school my tribe took over our Indian Health Services hospitals. And it was quite controversial when it happened. My aunts and uncles, I

remember them saying, the government is crazy. There is no way we can run that health center better than the federal government can. Why would we want to take that over? So I mean, it was literally a risky thing for him to do to say well I'm going to take this over. But you know what, in about three or four month everybody started seeing improvements. We could -- my tribe could run IHS better than IHS could run IHS. It's not a big surprise that that might be the case because tribal employees are a lot more accountable to the community than federal employees are, you know, and so -- but it quickly improved the service at our his hospital, and that was the -- I became a believer then when I was still very young. And I really believe in self-determination. *Kevin Washburn, Assistant Secretary -- Indian Affairs (Gila River Tribal Consultation)*

And I just want to that say that worrying about the Navajo Nation is not exactly a bad thing. It's actually a good thing; it's building the capacity of tribes. And I think one thing is to be able to give the Navajo Nation the resources to be able to help and service our schools and that's what I see as one of the great concepts that's contained in this is helping the tribe build its capacity because one of the causes that's come up is the tribe is not ready. It's really a heart breaker to think that your own people, your own nation, your government can't do it. It just doesn't fly. The only way the tribe can do it is if it's allowed the ability to do it. And I'm hoping through something contained in this document that the Department of Education and other tribal educations departments are allowed that same opportunity to do for their own schools. *Matthew Tso, legislative analyst, Dine Department of Education (Gila River Tribal Consultation)*

A part of tribal sovereignty and self-determination is our right to fail. We have that right, and we are asking for that right. But we also have the right to succeed, and we have the know-how, as it was pointed out earlier, we have the knowledge. Basically we're talking about tribal control. *Robert "Tuffy" Lunderman, Rosebud Sioux Tribe Council Member (Pine Ridge Consultation)*

We talk about building foundations and how tribes can take over these schools. We've got to give the tribe a reason to take over this school. They've got to want to do that. You know, and you've got to get a foundation -- you've got to give a foundational reason for wanting to give you money to help these students. The only way we can do that is to give them evidence that we truly mean what we say when we say we're going to reform this system and raise the level and quality of education in this country for our Indian students. And if we truly believe that, then we can do it. *Jefferson Keel, Lieutenant Governor of the Chickasaw Nation (former President of the National Congress of American Indians) (Anadarko Tribal Consultation)*

Immersion programs not only increase academic achievement, but also guarantee that a student's language will be carried forward for generations. Our communities' unique cultural and linguistic traditions are crucial for the success of our students and are critical cornerstones for providing relevant and high quality instruction as part of an education that ensures Native students attain the same level of academic achievement as the majority of students. NIEA and NCAI request the BIE ensure that reform strengthens the ability of the federal government to support tribes in the delivery of culturally-relevant curricula. *National Congress of American Indians and National Indian Education Association*

The report says the BIE will transition from running schools to serving tribes. However, the BIE must ensure it has the ability to continue serving tribes who decide their trust principles would be

violated if the agency forces a tribe to assume operational responsibility of a former BIE school. *National Congress of American Indians and National Indian Education Association*

Rather, we need a change in capacity and a restructuring that supports community collaborators who will sit with a principal chief in Oklahoma or a pueblo governor in New Mexico to find solutions to local problems. *National Congress of American Indians and National Indian Education Association*

The three-year competitive incentive-based grant, similar to existing Race to the Top initiatives for which BIE continues to be excluded, could provide much-needed resources to tribes for accelerating local reforms and aligning education services to tribal education priorities that include language and culture. Further, performance metrics for the grant could include student attendance rates, graduation rates, college enrollment rates, and measures on educator accountability. In order to catalyze reform efforts and create a set of high-performing, tribally controlled grant schools, BIE could also provide on-going technical assistance to building the capacity of those schools that applied for, but did not receive, a grant. *National Congress of American Indians and National Indian Education Association*

It is important to note that a competitive grant idea has garnered some opposition in remarks from tribes. To address this, such a competition should not replace existing funds from other much-needed programs. *National Congress of American Indians and National Indian Education Association*

Reform Area 4: Comprehensive Supports through Partnerships

The kids that come to these schools, in many cases, come from troubled backgrounds. Many times they come from broken homes; they come from places where they're not wanted; they're not loved and they're not treated very well because of a lot of things. Regardless of whether we can blame it on drugs, alcohol, or the dysfunctional family unit. Whatever it is, these kids come here and they come here with an expectation that they need to be treated in a humane way, in a loving way. Sometimes that happens and sometimes it's not so good. I'm not saying that just about Riverside, I'm talking about all the BIE schools across the country. Jefferson Keel, Lieutenant Governor (*and former President of the National Congress of American Indians*) (*Anadarko Tribal Consultation*)

The next thing is that our students suffer from trauma. This is another thing that we do at Alamo since we have a clinic there we have -- how many people -- how many schools here believe that their students have because of poverty and unemployment and the issues going on at home their students have ideations of either suicide or homicide or a combination? Everybody here, right? Everybody. *Michael Hawk, Executive Director, Alamo Navajo School Board (Gila River Consultation)*

If we want to really do innovative work to support these gaps and bridge these gaps and problems that our children are falling through the cracks, then we need more innovative ways of looking at partnerships in regards to these social problems. Our children are, the majority of our children in some way or another have been or are victims of the emotional trauma, of historical

trauma, and so we -- without dealing with those social problems as well, that's when you start to see the high dropout rate, the cycle of, you know, most of our children not getting through high school, let alone starting to see the changes and actually making it to the 8th grade so we need to start to look at that in a very innovative way including the students as well with -- excuse me -- with teachers. *Lieutenant Governor Steven Lewis, Gila River Indian Community (Gila River Tribal Consultation)*

I like the information that's being shared. But I am concerned about the factors of the students suffer from trauma. That's kind of the psychosocial issue that's identified here as impacting academic performance. And many of our tribal students not only come from families of trauma, we can list all of those social ills, and we all would understand. But my concern is that they tend to be more of our transient students. And that's something that's not being tracked... But when we have transient students coming and going and rolling over, possibly 30 percent of the population in our tribal school is in and out, relocating from one community to another, .that has an impact on academic performance. *Lynn Palmanteer-Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)*

Reform Area 5: Budget Alignment

The Blackwater Community School's education program from early childhood through grade two receives funding from the Department of the Interior, Bureau of Indian Education. Since school year 2009-2010 funding has risen only 5 percent, less than \$330.00 per student. Historically funding would have risen by 12 percent over the same three year time period. Insufficient funding has resulted in the school not being able to provide raises to its faculty and support staff for the past four years, there by affecting retention of high quality instructional staff. The No Child Left Behind legislation requests schools to hire and retain highly qualified staff. This is impossible to do given the current budget situation, as we have to compete with other schools in our area. We have also been unable to provide professional development of opportunities for teachers to ensure they remain current in practices that are changing due to the implementation of the Common Core standards. Without adequate funding schools in the BIE school system are not able to meet this requirement. Due to lack of funding we have been unable to purchase new textbooks and computers to support the move to the new standards that are supported by the Department of Education and Arizona State Department of Education We also have not been able to provide extra -curricular activities, summer education programs to retains and enhance learning, and address much needed deferred maintenance. *Henry Pino, Blackwater School Board President (Gila River Tribal Consultation)*

The other thing [we are] on the same page is, I think I hit on the budget is not aligned with the school improvement. I do think you need to look into de-categorization of funding because it makes you more nimble and multi-faceted in the construct of its approach. You might look into that because now it's very rigid when you try to -- we went through this in early childhood and Head Start funding where we couldn't commingle funds and then we got that. There is pass through the bond administration so that helps. *Michael Hawk, Executive Director, Alamo Navajo School Board (Gila River Consultation)*

The proposal by the Study Group to build capacity of tribal the organizations and grant school is

commendable, however, it is also noted there are additional resources to support this effort. *Suzanne Acuna, Blackwater Community School, School Board Member (Gila River Tribal Consultation)*

[O]ne of the biggest obstacles to tribal control of schools is inadequate funding for tribal grant support costs. The CFO for the Santa Fe school mentioned that this morning. One of the great, great things that happened right now with Assistant Secretary Washburn is full funding for contract support costs for tribal 638 contracts in self-government. That's a historic change. So they're doing it with 630, tribal 638 and it's time to do that with the schools. The budget request for 2015 for tribal grant support costs is \$48 million which is the same as the 2014 operating cost. In last year's read back it was pointed out that \$48 million would fund 67 percent of the need. Well, full funding need for tribal grant support costs is \$5 million. So if we remove that impediment to tribal contracting or grant status for schools, BIA should request \$75 million for tribal grant support costs in the 2016 budget. *Michael Hughes (Gila River Tribal Consultation)*

We face the dilemma by having to use our ISEP funds to pay for electrical bills, custodial help, heating and general maintenance. We pay about \$250,000 out of our ISEP funds alone for this every year. And administrative cost grants are being seriously constrained, so we are having have a little bit of a problem with segregation of duties. *Shirley Gross (Pine Ridge Consultation)*

The question about using carry over money for other unallocated type projects, my experience over many, many years... money that's carried over, because it has such categorical rules, you're restricted and don't use it -- you can't just go out and do, you know, a project for the school or like playground equipment. Title I says you can buy supplies, but you can't buy textbooks with it. The rule always has been that textbooks are expected to be purchased out of your school budget, which would be your general fund. So there are these rules that you have to learn. [K]nowing the rules is important in understanding how you can use that extra carry over money. Most of the time, if it's in category funding, special education, for example, you can't just go out and use it for anything. I would love to use my carry over money, special education, Title I, and so on, but I'm restricted in the rules that that funding came down through. The auditors will come calling and ask, why are you spending that money? And I have to be able to justify that... Great, [the stimulus funding] will help us, but because it was in Title I or special education, we could not use it in our general education fund, which is where we needed it. So if I'm laying a math teacher off, for example, special education fund, I couldn't use that. And also Title I is limited to supplement, not supplant. So that's the foundational principle. So it's something that the school should be doing or offering, is general education, which would be our general fund. We couldn't use these other dollars. *Michael Bundy, Superintendent, Two Eagle River School (Auburn Tribal Consultation)*

I have a comment as an administrator. I'm like freaking out if somebody has carry over. Why are you not spending your money? There has to be a really good justification why there's any money left, especially with the underfunded programs that we're all operating. I mean, sometimes in my opinion, in my observation, that has been because of the lack of administrative fiscal management experience of an administrator... So I would be wanting to assess why there's so much carry over. Is it a spending mechanism that has restrictions? They don't know how to spend it? Whatever. There has to be some kind of intervention somewhere. *Lynn Palmanteer-*

Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)

[C]arry over funds flexibility would be greatly enhanced if administrators could take any carry over funds that they have and use them for the purpose of for their school board, and where they as the leader of the school feel that it will advance the students in their culture, social, and safety practices at the school. My focus is on all of that. *Harvey Whitford, Principal, Wa He Lut Indian School (Auburn Tribal Consultation)*

To support BIE budget autonomy and tribal negotiations, we also request that BIE reform include the creation of a Tribal Education Budget Council that functions similar to the Tribal Interior Budget Council. *National Congress of American Indians and National Indian Education Association*

For too many years, DOI had made other programs under its purview priorities while Native Education programs and the BIE were considered afterthoughts. *National Congress of American Indians and National Indian Education Association*

As a result of BIA authority over the BIE budget, the BIE is often low in priority when compared to other programs. *National Congress of American Indians and National Indian Education Association*

The BIA currently funds only 65 percent of support costs in the 126 tribally managed schools and residential facilities under the BIE purview. This forces the schools to divert critical classroom education funding in order to cover the unpaid operational costs, which make it unrealistic to improve educational outcomes and bridge the achievement gap among Native and non-Native students. *National Congress of American Indians and National Indian Education Association*

Cross-Cutting and General Comments

Another recommendation is to streamline bureaucratic operational processes such as hiring staff, contracting for services, purchasing basic supplies, requests for repairs, and improve responsiveness of service to meet the unique needs of a school and school year operations... Another is to prepare our principals and teachers for the implementation for the Common Core and insure an effective information technology infrastructure to administer the 21st Century assessment... And lastly, improve the quality of technical assistance and support to all schools including safety and capacity of schools to transition to tribally-controlled schools. Again, these are our recommendations. Thank you. *Greg Mendoza, Governor, Gila River (Gila River Consultation)*

Thanks for being upfront. Seriously. I'm talking about the fact that we have somebody who actually comes from Department of Education who's actually speaking the truth and sitting next to BIE. And this is collaboration. And that's a good thing. *Lynn Palmanteer-Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)*

I have heard from tribal leaders that, oh, the BIA is having another consultation. Why should we go? We go, they're going to tell us what they're going to do anyway. And so with that kind of attitude I think it's permeated for a long time because of the BIE process. But I can tell you that, you know, through this process and the people involved in this, they're committed to make changes. In the past decade or maybe more we've never had an opportunity to make some meaningful changes within the BIE's system. I heard a former BIE Director who spent a year up in Washington D.C. and said "I spent all my time listening to people telling me why we can't change this. Why we can't do this; why we can't do that." And I think this process here is an eye-opener. You know, we've got here not only the Secretary but also -- both the Department of Interior and Education but also the Administration. They want to make changes. We need to have changes. *Quinton Roman Nose, Executive Director, TEDNA and member of Riverside Indian School Board (Anadarko Tribal Consultation)*

I think there are so many significant flaws in this [draft Report], it's almost, you could say an act of folly so much that's in it, but there's also some really powerful important things in here that I hope you don't lose sight of because there's so many significant flaws. And so one of the things is they validated a lot of issues the tribal people have been saying for decades that is wrong with the Bureau of Indian Education, Bureau of Indian Affairs. For the first time it's been validated. It's been put in a report for everybody to look at, so I commend you guys for that. That's transparent; that's honest. And that's something that we all can go forward and work with. There are also some really positive solutions in here as well, and I hope we don't lose sight of that. *Ryan Wilson, President, National Alliance to Save Native Languages (Pine Ridge Tribal Consultation)*

I am so appreciative of the Bureau's efforts to solicit input in what I see will become transformational in terms of the journey of education that our institutions [will undergo]. And it's good to see our tribal leadership here, and our tribal educators who will be charged with helping to implement the vision that you have outlined. And these four pillars are amazing in what they propose. They will provide a basis for, again, the transformation that is necessary to move us away from a bureaucratic monster that is cumbersome and unresponsive and lacking in the compassion that is conveyed by some of the staff members that we have here in our midst. I think it's important for us to feel that the institution is responsive. And I think the findings of the study go a long way. I know there's trepidation, I know there's concern that maybe we will bite off more than we can chew. But as my colleague, Mr. Anderson, conveyed, we have to look at the ending, it doesn't matter what our beginning was. *Jacob Tostigh, former Indian Education Director, Anadarko Public Schools (Anadarko Tribal Consultation)*

We need to keep moving forward. If we lose some of the acceleration we've had, we're not doing justice to the families, the tribe, and the children that come into our gates. I'll give you a small example. Our testing started this week, the Washington state test. We had a rally on Friday. We're going to rock it. We're going to rock the test. We prepare the children for the rally that week. We had a lot of thinking go into it... We're all in it, including the families, the tribes and the communities the kids come from. The state test is all of us, including the custodians, the cooks, the bus drivers. We're all there. *Harvey Whitford, Principal, Wa He Lut Indian School (Auburn Tribal Consultation)*

Just to close, I think one of the things that has bothered me for the longest time is how we can build schools in Afghanistan and Iraq, and we can buy buildings there, but we can't find the millions of dollars that we need to fix [the BIE]. And I think that's what we need to do, and use all the leadership and power that we have to do that. *Michael Segroves, Eastern Oklahoma Tribal Schools (Anadarko Tribal Consultation)*

So once [American Horse School] got the School Improvement Grant, I thought, "here we go, we're going to make a difference." And we did. We went up our 60 points. And the next year we had our advanced education accreditation inspection at American Horse School. The lowest score we received we got a two in technology because our BIE bandwidth was not wide enough so we could take the exams that we were supposed to take. *Gloria Coats-Kitsopoulos, School Superintendent, American Horse School (Pine Ridge Tribal Consultation)*

I have seen a lot of initiatives come and go. I've seen a lot of initiatives start and fail and get sidetracked. And it's not often that I get an opportunity to talk positively about something I see the federal government trying to do. And I'm glad to be able to do that today. *Michael Hughes (Gila River Tribal Consultation)*

If you go to any branch chief at any agency in the BIA and say, what are your GPRA measures they can't answer that question because there's no communication, no discussion, no training, within the BIA and every BIA staff person is expected to figure that out on their own. *Michael Hughes (Gila River Tribal Consultation)*

Blackwater Community School supports the Bureau's effort to improve educational opportunities for all Indian students. Many of the recommendations contained in the study group's report reflected many recommendations from previous reports on Indian education beginning in 1920s including those from the National Academy of Public Administration in 1995 and 2001... This has been a pattern of Indian Affairs to start an initiative but fail to continue them. We urge Indian Affairs to carry through with this initiative. Suzanne Acuna, Blackwater Community School, School Board Member *(Gila River Tribal Consultation)*

The focus for our Tribe will follow the four pillars of reform. The Hopi tribe wants to identify, recruit, retain, and empower diverse, highly effective teachers and principals. We want to build a responsive structure with appropriate authority, resources, and services so that our students can attain high levels of student achievement. The budget will be established to build capacity to insure best practices are implemented. And, finally, we want to cultivate family and community to partner with all state holders to ensure all students are successful. *Hopi Tribal Chairman, Herman Honanie (Gila River Tribal Consultation)*

[W]e do not want the federal government to abrogate, to stop, to in any way start to back away from their trust responsibilities to Indian Country in regards to education. I think that's what tribal leaders, especially me, are most concerned about. *Lieutenant Governor Steven Lewis, Gila River Indian Community (Gila River Tribal Consultation)*

By the occupation that you've had today, just by looking at your plan, in theory it looks good, on paper it looks good. But when you actually implement it at our school, at our Navajo Nation, it's

going to be hard to implement it the way that you want because of the political clout of some of these people and our tribal history of managing money and managing programs... I think in theory it looks like a good model and it could be workable, but with people who knew how to manage and be able to have the right credentials and not be politically motivated, then it could work. *Jeffrey Mike, Pinon Community School, School Board President (Gila River Tribal Consultation)*

I have spoken to the general assembly on the need for tribal leaders to step up and elevate education on our agenda and to begin to actively participate in issues related to education and education planning. Why? You can talk about AYP, all the issues structurally within the -- administratively within the school system. But the reality is, tribal leaders are the ones who have -- we are the ones ultimately responsible to set policy, prioritize what is going to be funded, how we're going to allocate those funds, what percentage of funds goes where. *Lynn Palmanteer-Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)*

I do like what you're saying. I do like what is in the report -- the preliminary report that you have put out. You will be in the work-study group and I'm looking forward [to working with you]... Other individuals, in the same capacity, as the Director of BIE and OIE who have not been able to move and make reform, but I think that with the President, who is listening, who is ordering this, two Secretaries and more who are willing to come together to work on these issues, that this may be the time when we can see improvement in our BIE-funded schools and the changes and reforms that you make. *Gloria Sly, President, Tribal Education Departments National Assembly (Anadarko Tribal Consultation)*

Sometimes, as you've heard, our bandwidth is so bad in our most of our tribal schools, there's email I don't even get. I can click on the email, I'll go get up and visit a classroom, and come back, and it hasn't opened. I live in an RV park five days a week. My RV has better connectivity than the school. And I'm just using a little jetpack through Verizon. We have got to solve that problem too. Our kids are lacking educational opportunities, because we can't access the Internet. *Mark Jacobson, Principal and Acting Superintendent, Quileute Tribal School (Auburn Tribal Consultation)*

I don't know where BIE is on the community net or the USDA fiber work that's being done across the nation, but there was -- every state has been receiving funds for rural communities to gain access, and schools are a priority. Schools and hospitals. It's kind of scary to hear that Quileute is still out there not having fiber or broadband access, and that should be federally funded. I mean, that's what's happening across the nation. And a number of schools like Tulalip and Yakima Nation and a number of nations or tribes around Washington State have benefited from that program. So I wish that BIE would be in there fighting with USDA to get some of those dollars and break some ground to get fiber out to our schools. That's a priority. *Lynn Palmanteer-Holder, Tribal Council Member, Confederated Tribe for the Colville Reservation (Auburn Tribal Consultation)*

Currently, teachers have been cut from using copy paper. Pencils, sharpeners and other materials are so inferior they break constantly. Teaching positions are unfilled. And, wireless Internet goes

unused without wireless computers to use them on (all most all computers hadn't had wireless cards installed when wireless networks were made available). *Bradley Budinger*

The SWO operates two PL 100-297 Grant schools which encompasses nearly 700 Sisseton Oyate Children. The 2013 facility funding is constrained 48.56 percent which forces the school's to supplement needed facility operational funding from other budgets. We are requesting field hearings regarding the constraint of facility funding. This funding level is vastly inadequate. Further cuts due to sequestration of 14/15 school year budgets will be devastating. *Chairman Robert Shepherd, Sisseton Wahpeton Oyate*

One of the biggest concerns Northern Cheyenne has is the construction program. They have a 100 year old building for their school. It has no new technology and is dilapidated. BIA has given the Northern Cheyenne some temp buildings, but there was nothing that went with them. Thus, these buildings are not in use. Further, if they don't have computers and new instruction materials, the buildings can only go so far. *Northern Cheyenne Nation via Quinton Roman Nose, Executive Director, TEDNA*

Despite the overwhelming data on the school facility construction and renovation needs, and a plethora recommendations submitted by tribes and the School Facilities and Construction Negotiated Rulemaking Committee, the BIE has yet to make significant changes or initiate a thoughtful, deliberative approach in resolving the issues. At a minimum, the BIE must comply with the congressional directive to reopen the school construction priority process. Equally important though, BIE and the Administration must advocate for replacement school construction funding. In our view, the Administration should seek a similar five-year, \$5 billion special funding package that was employed to bring parity among the Department of Defense funded schools through repair or replacement. We also note that, unlike the BIE Facilities Plan, the DOD five-year Facilities Plan includes the replacement schools costs for projects anticipated to occur during that period. *Submission Dzilh-Na-O-Dith-Hle Community Grant School*

APPENDIX C

Academic Performance for BIE-Funded Schools as Measured by the Status on Adequate Yearly Progress (AYP), 2012-13

AYP Status SY2012-13	BIE-Operated Schools	Tribally Controlled Schools	Total
No. of Schools	58	117	175
<i>Met AYP</i>	9	17	26
<i>Met AYP in New Mexico (2011-12)</i>	5	3	8
<i>Total Schools Met AYP</i>	14 (24%)	20 (17%)	34 (19%)
No. of Schools under “Restructuring” (Low Performance for years)	17 (29%)	42 (35%)	59 (34%)

APPENDIX D

Numbers of Full-Time Employees (FTEs) at BIE-Funded Facilities

1. Numbers of FTEs at BIE Day Schools (Non-Dormitory Facilities)

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
CA	6th – 12th	115	Tribal	Noli School	44	18
ND	6th – 8th	319	BIE	Turtle Mountain Middle School	80	40
NM	6th – 8th	98	Tribal	Laguna Middle School	34	9
AZ	7th – 12th	623	Tribal	Hopi Jr/Sr High School	159	53
NC	7th – 12th	459	Tribal	Cherokee High School	112	66
NM	7th – 12th	216	Tribal	Shiprock Northwest High School	137	48
NV	7th – 12th	78	Tribal	Pyramid Lake High School	41	13
MS	7th – 8th	167	Tribal	Choctaw Central Middle School	41	23
AZ	9th – 12th	115	BIE	Tohono O'odham High School	20	10
ND	9th – 12th	455	Tribal	Turtle Mountain High School	261	119
WA	9th – 12th	67	Tribal	Yakama Nation Tribal School	37	10
WA	9th – 12th	107	Tribal	Lummi High School	117	63
IA	K – 12th	260	Tribal	Meskwaki Settlement School	98	43
AZ	K – 12th	322	Tribal	Rock Point Community School	76	32
AZ	K – 12th	424	Tribal	Dishchii'bikoh Community School (Cibecue)	90	30
FL	K – 12th	117	Tribal	Miccosukee Indian School	55	33
KS	K – 12th	46	Tribal	Kickapoo Nation School	33	10
MI	K – 12th	106	Tribal	Hannahville Indian School	50	31

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
WI	K - 12 th	224	Tribal	Lac Courte Oreilles Ojibwa School	105	46
WI	K - 12 th	372	Tribal	Oneida Nation School	130	100
WY	K - 12 th	184	Tribal	St Stephens Indian School	71	36
AZ	K-2 nd	201	Tribal	Blackwater Community School	42	14
NM	K-3 rd	84	BIE	Bread Springs Day School	23	12
NM	K-3 rd	52	BIE	Sanostee Day School	12	5
AZ	K-4 th	89	BIE	Pine Springs Day School	20	5
AZ	K-4 th	280	Tribal	Casa Blanca Community School	48	23
NM	K-4 th	58	BIE	Beclabito Day School	21	12
NM	K-4 th	96	BIE	Tse'ii'ahi' Community School (Standing Rock)	28	16
ND	K-5 th	708	BIE	Turtle Mountain Elementary School	111	78
NM	K-5 th	208	Tribal	Laguna Elementary School	32.5	17
SD	K-5 th	219	Tribal	Crow Creek Sioux Tribal Elementary School	31	9
AZ	K-6 th	77	Tribal	Little Singer Community School	27	7
AZ	K-6 th	172	Tribal	Kin Dah Lichi'i Olta	46	8
AZ	K-6 th	123	BIE	First Mesa Elementary School	28	15
AZ	K-6 th	154	Tribal	Hopi Day School	38	12
AZ	K-6 th	87	BIE	Keams Canyon Elementary School	16	8
AZ	K-6 th	196	Tribal	Moencopi Day School	48	14
AZ	K-6 th	265	Tribal	Second Mesa Day School	57	19
AZ	K-6 th	399	Tribal	Salt River Elementary School	61	40
AZ	K-6 th	44	BIE	Cove Day School	8	5

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
MS	K-6 th	628	Tribal	Pearl River Elementary School	99	71
MS	K-6 th	126	Tribal	Standing Pine Elementary School	33	17
NM	K-6 th	247	Tribal	Atsa' Biya' a'zh Community School	41	17
NM	K-6 th	29	BIE	San Ildefonso Day School	7	3
NM	K-6 th	124	BIE	Santa Clara Day School	23	13
NM	K-6 th	14	Tribal	Te Tse Geh Oweenge Day School	8	4
NM	K-6 th	166	BIE	Isleta Elementary School	29	18
NM	K-6 th	143	BIE	Jemez Day School	27	14
NM	K-6 th	352	BIE	Baca/Dlo'ay Azhi Community School	61	39
WA	K-6 th	181	Tribal	Lummi Tribal School System	117	63
NM	K-7 th	400	BIE	San Felipe Pueblo Elementary School	64	44
NM	K-7 th	76	BIE	T'siya Day School (Zia)	18	11
AZ	K-8 th	39	Tribal	Black Mesa Community School	21	5
AZ	K-8 th	246	BIE	Cottonwood Day School	34	13
AZ	K-8 th	131	Tribal	Chilchinbeto Community School	40	14
AZ	K-8 th	219	BIE	Tonalea Day School	37	16
AZ	K-8 th	185	BIE	Santa Rosa Day School	33	19
AZ	K-8 th	72	BIE	Havasupai Elementary School	11	6
AZ	K-8 th	108	Tribal	Hotevilla Bacavi Community School	38	12
AZ	K-8 th	191	BIE	Red Rock Day School	37	20
AZ	K-8 th	473	Tribal	Gila Crossing Community School	83	32
AZ	K-8 th	211	BIE	John F. Kennedy Day School	45	28

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
AZ	K-8 th	254	BIE	San Simon School	46	31
AZ	K-8 th	150	BIE	Santa Rosa Ranch School	16	8
ID	K-8 th	113	Tribal	Coeur d'Alene Tribal School	35	13
ID	K-8 th	90	Tribal	Shoshone-Bannock School District No, 512	36	21
ME	K-8 th	101	Tribal	Indian Township School	58	21
ME	K-8 th	97	Tribal	Beatrice Rafferty School	40	24
MI	K-8 th	283	Tribal	JKL Bahweting Anishnabe School	102	46
MS	K-8 th	200	Tribal	Bogue Chitto Elementary School	55	36
MS	K-8 th	249	Tribal	Conehatta Elementary School	58	39
MS	K-8 th	144	Tribal	Red Water Elementary School	40	23
MS	K-8 th	140	Tribal	Tucker Elementary School	36	22
NC	K-8 th	511	Tribal	Cherokee Elementary School	102	68
ND	K-8 th	524	Tribal	Tate Topa Tribal School	179	67
ND	K-8 th	140	Tribal	Theodore Jamerson Elementary School	66	27
ND	K-8 th	205	BIE	Dunseith Day School	43	23
ND	K-8 th	248	BIE	Ojibwa Indian School	56	27
ND	K-8 th	33	Tribal	Twin Buttes Day School	50	24
NM	K-8 th	84	Tribal	Ohkay Owingeh Community School	21	9
NM	K-8 th	159	BIE	Taos Day School	37	21
NM	K-8 th	208	BIE	Sky City Community School	39	24
NM	K-8 th	106	Tribal	Na'Neelzhiin Ji'Olta (Torreon)	44	13.5
NM	K-8 th	163	BIE	Ojo Encino Day School	25	13

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
NM	K-8 th	134	Tribal	Dibe Yazhi Habitiin Olta', Inc. (Borrego Pass)	42.5	11
NV	K-8 th	12	Tribal	Duckwater Shoshone Elementary School	4	1.5
SD	K-8 th	261	Tribal	American Horse School	43	12
SD	K-8 th	209	Tribal	Loneman Day School	55	12
SD	K-8 th	172	Tribal	Porcupine Day School	46	14
SD	K-8 th	133	Tribal	Wounded Knee District School	38	14
SD	K-8 th	52	Tribal	Rock Creek Grant School	31	9
SD	K-8 th	83	Tribal	Sitting Bull School	33	7
SD	K-8 th	155	Tribal	Enemy Swim Day School	68	22
WA	K-8 th	119	Tribal	Wa He Lut Indian School	38	14
WI	K-8 th	202	Tribal	Menominee Tribal School	43	26
FL	PK-12 th	120	Tribal	Ahfachkee Day School	59	24
LA	PK-8 th	91	Tribal	Chitimacha Tribal School	25	13
ME	PK-8 th	87	Tribal	Indian Island School	36	22
		25611		TOTALS	6848	3277.2

2. Number of FTEs at BIE Boarding Schools (having a BIE-funded academic unit)

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
SD	5th - 8th	173	Tribal	Pierre Indian Learning Center	93	26
OK	4th - 12th	476	BIE	Riverside Indian School	195	59
ND	5th - 8th	89	Tribal	Circle of Nations	91	19
SD	6th - 12 th	252	Tribal	Crow Creek Reservation High School	26	13
AZ	6th - 8 th	100	Tribal	Theodore Roosevelt School	23	8
MS	7th-12 th	398	Tribal	Choctaw Central High School	131	51
NM	7th-12 th	596	Tribal	Santa Fe Indian School	205	63
AZ	9th-12 th	304	Tribal	Greyhills Academy High School	114	38
AZ	9th-12 th	408	BIE	Many Farms High School	80	28
CA	9th-12 th	328	BIE	Sherman Indian High School	111	25
NM	9th-12 th	246	Tribal	Navajo Preparatory School	101	25
NM	9th-12 th	454	BIE	Wingate High School	134	43
OK	9th-12 th	365	Tribal	Sequoyah High School	117	40
OR	9th-12 th	343	BIE	Chemawa Indian School	136	31
SD	9th-12 th	238	BIE	Flandreau Indian Boarding School	87	20
AZ	K-12 th	152	Tribal	Leupp School, Inc.	59	17
AZ	K-12 th	329	Tribal	Rough Rock Community School	111	40
NM	K-12 th	270	Tribal	Pine Hill Schools	111	27
SD	K-12 th	838	BIE	Cheyenne-Eagle Butte School	132	74
SD	K-12 th	850	BIE	Pine Ridge School	154	80
SD	K-12 th	249	Tribal	Marty Indian School	109	33
AZ	K-5 th	170	Tribal	Hunters Point Boarding School	45	11

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
AZ	K-5 th	139	BIE	Jeehdeez'a Academy, Inc.	32	11
AZ	K-6 th	111	Tribal	Wide Ruins Community School	36	10
AZ	K-6 th	105	Tribal	Nazlini Community School	36	9
NM	K-6 th	189	BIE	Mariano Lake Community School	39	19
NM	K-6 th	158	BIE	Crystal Boarding School	35	13
NM	K-6 th	158	BIE	Nenahnezad Community School	44	23
UT	K-6 th	162	BIE	Aneth Community School	40	16
AZ	K-8 th	278	Tribal	Many Farms Community School	80	28
AZ	K-8 th	170	BIE	Dennehotso Boarding School	36	15
AZ	K-8 th	260	BIE	Kaibeto Boarding School	50	21
AZ	K-8 th	121	BIE	Rocky Ridge Boarding School	28	14
AZ	K-8 th	1276	BIE	Tuba City Boarding School	232	114
AZ	K-8 th	159	BIE	T'iis Nazbas Community School	49	17
AZ	K-8 th	179	Tribal	Dilcon Community School	46	14
AZ	K-8 th	189	Tribal	Greasewood Springs Community School, Inc.	64	19
AZ	K-8 th	363	Tribal	Shonto Preparatory School	123	44
AZ	K-8 th	356	BIE	Kayenta Community School	87	37
AZ	K-8 th	106	Tribal	Naa Tsis'aan	32	11
AZ	K-8 th	388	Tribal	Lukachukai Community School	89	32
NM	K-8 th	253	BIE	Pueblo Pintado Community School	70	38
NM	K-8 th	48	BIE	Lake Valley Navajo School	18	8
NM	K-8 th	373	BIE	T'iis Ts'ozi Bi'Olta' (Crownpoint)	82	37

State	Grade Range	Students Enrolled	Tribal or BIE	School Name	Employees (All Staff)	Certified Educators
NM	K-8 th	110	BIE	Chi Chil'tah Community School	34	16
NM	K-8 th	396	Tribal	Ch'ooshgai Community School	121	44
NM	K-8 th	169	BIE	Tohaali' Community School	43	18
NM	K-8 th	446	BIE	Wingate Elementary School	122	46
NM	K-8 th	181	Tribal	Dzilth-Na-O-Dith-Hle Community School	69.5	16.5
AZ	K-9 th	113	BIE	Seba Dalkai Boarding School	33	12
WA	K-9 th	147	Tribal	Paschal Sherman Indian School	50	16
		14731		TOTALS	4185.5	1489.5

3. Number of FTEs at BIE Colleges

State	Student Enrollment	Name of Postsecondary Institution	Employees	Instructors (subset of employees)	Annual Base Funding
KS	846	Haskell Indian Nations University	201 (154)	38	\$11,500,000
NM	488	Southwestern Indian Polytechnic Institute	103 (101)	22	\$8,378,541
Totals	1,334		304	60	\$19,878,541

4. Numbers of FTEs at BIE Dormitories

State	Grades	Students	Operation	Name of School	Employees	Annual Base Funding
MT	1-12	115	BIE	Blackfeet Dormitory	18	\$1,787,243
NM	1-12	10	Tribal	Jicarilla Dormitory	14	\$475,792
OK	1-12	60	Tribal	Eufaula Dormitory	24	\$1,078,210
SD	1-12	123	Tribal	Sicangu Owayawa Oti (Rosebud Dormitory)	22	\$1,325,029
OK	1-12	56	Tribal	Chickasaw Children's Village	40	\$1,010,903
OK	1-12 (K-6)	159	Tribal	Jones Academy	77	\$3,141,835
NM	K-12	60	Tribal	Hanaa'dli Community School/Dormitory, Inc.	29	\$1,280,416
AZ	K-12	83	Tribal	Pinon Community School	37	\$2,350,602
AZ	7-12	138	Tribal	Winslow Residential Hall	28	\$1,480,313
AZ	9-12	113	Tribal	T'iisyaakin Residential Hall (Holbrook)	32.5	\$1,448,170
AZ	9-12	137	Tribal	KinLani Bordertown Dormitory	35.5	\$1,441,936
UT	9-12	78	Tribal	Richfield Residential Hall	20	\$4,528,518
NM	9-12	71	Tribal	Shiprock Reservation Dormitory	11	\$2,098,769
NM		99	Tribal	Kinteel Residential Academy (Aztec Dorm)	15	\$974,309
		1302		TOTAL	403	\$24,422,045

APPENDIX E

Current Bandwidth at BIE-Funded Schools

School Name	Current Configuration	Recommended Configuration	SEDTA Recommended Configuration	User Count
Aztec High School Dormitory	1XT1	2XT1	5Mbps	89
Duckwater Shoshone School	1XT1	2XT1	1Mbps	9
Jeehdeez'a Elementary School, Inc.	1XT1	4XT1	20Mbps	295
Jones Academy	1XT1	4XT1	20Mbps	230
Nazlini Boarding School	1XT1	3XT1	10Mbps	136
Richfield Residential Hall	1XT1	3XT1	10Mbps	114
Theodore Roosevelt School	1XT1	3XT1	10Mbps	115
Tiisyaatin Residential Hall (Holbrook)	1XT1	3XT1	10Mbps	135
Wide Ruins Community School	1XT1	3XT1	10Mbps	155
Turtle Mountain Community Elementary School	No Circuit	2XT1	N/A	0
Turtle Mountain Community Middle School	No Circuit	2XT1	N/A	0
Turtle Mountain High School	1XT1	6XT1	60Mbps	659
First Mesa Day (Polacca)	3XT1	3XT1	10Mbps	194
Tuba City Boarding School	6XT1	6XT1	100Mbps	1234
Flandreau Indian School	5XT1	4XT1	30Mbps	365
Marty Indian School	4XT1	4XT1	30Mbps	338
Pierre Indian Learning Center	1XT1	4XT1	20Mbps	254
Sicangu Owayawa Oti (Rosebud Dorm)	1XT1	3XT1	10Mbps	112
Wa He Lut Indian School	1XT1	3XT1	10Mbps	128
White Shield School	1XT1	3XT1	10Mbps	157
Tiospaye Topa School	3XT1	2XT1	10Mbps	193

Dunseith Day School	1XT1	3XT1	10Mbps	187
Blackwater Community School	1XT1	4XT1	30Mbps	332
Lac Coute Oreilles Ojibwa School	1XT1	4XT1	20Mbps	297
San Simon School	1XT1	4XT1	20Mbps	253
Santa Rosa Boarding School	1XT1	4XT1	20Mbps	250
Sky City Community School	1XT1	4XT1	20Mbps	225
Baca/Dlo'ay Azhi Community School	1XT1	6XT1	40Mbps	411
Keams Canyon Elementary School	1XT1	2XT1	5Mbps	92
Chinle Boarding School	1XT1	4XT1	30Mbps	333
Rocky Ridge Boarding School	1XT1	3XT1	10Mbps	154
Greyhills Academy High School	2XT1	6XT1	40Mbps	454
Ahfachkee Indian School	1XT1	4XT1	20Mbps	219
Coeur d'Alene Tribal School	1XT1	2XT1	10Mbps	100
Leupp Schools, Inc	No Circuit	4XT1	20Mbps	270
Rough Rock Community School	2XT1	6XT1	40Mbps	479
Santa Fe Indian School Inc	1XT1	6XT1	80Mbps	814
Second Mesa Day School	1XT1	4XT1	20Mbps	262
Shonto Preparatory School	2XT1	6XT1	40Mbps	465
Tiospa Zina Tribal School	2XT1	6XT1	50Mbps	566
Moencopi Day School	1XT1	4XT1	20Mbps	208
Choctaw Central High School	1XT1	6XT1	50Mbps	544
Alamo Day School	1XT1	4XT1	30Mbps	305
Twin Buttes Day School	1XT1	2XT1	5Mbps	60
Wounded Knee District School	1XT1	3XT1	10Mbps	133
Casa Blanca Community School	1XT1	4XT1	20Mbps	269
Cherokee Central High School	2XT1	6XT1	50Mbps	533
Fond du Lac Ojibwe School	1XT1	4XT1	30Mbps	316
Loneman Day School	1XT1	4XT1	20Mbps	253
Navajo Preparatory School Inc	1XT1	4XT1	20Mbps	237
Nay-Ah-Shing School	1XT1	4XT1	20Mbps	236

St. Francis Indian School	1XT1	6XT1	60Mbps	656
Crow Creek Reservation High School	1XT1	4XT1	30Mbps	314
Gila Crossing Day School	1XT1	6XT1	50Mbps	529
Menominee Tribal School	1XT1	4XT1	20Mbps	231
Circle of Nations-Wahpeton Indian School	1XT1	3XT1	10Mbps	185
Crow Creek Sioux Tribal Elementary School	1XT1	3XT1	10Mbps	153
Gila Crossing Day School North Campus	1XT1	2XT1	N/A	
Lower Brule Tribal School	2XT1	4XT1	30Mbps	316
Lummi Tribal School	1XT1	3XT1	10Mbps	133
Chitimacha Day School	1XT1	2XT1	5Mbps	99
Indian Island School	1XT1	3XT1	10Mbps	153
Rock Point Community School	1XT1	6XT1	40Mbps	446
Hopi Day School	1XT1	3XT1	10Mbps	144
New Paschal Sherman Indian School	1XT1	3XT1	20Mbps	200
Ohkay Owingeh Community School (San Juan)	1XT1	2XT1	5Mbps	85
Greasewood Springs Boarding School	1XT1	3XT1	10Mbps	172
Pine Hill Schools	1XT1	4XT1	30Mbps	360
Beatrice Rafferty School	1XT1	3XT1	10Mbps	126
Shoshone Bannock School	1XT1	3XT1	10Mbps	148
St. Stephens Indian School	1XT1	4XT1	20Mbps	248
Hanaa'dli Community School	1XT1	2XT1	5Mbps	90
Pyramid Lake High School	1XT1	3XT1	10Mbps	122

Residential Internet Broadband Comparisons:

ADSL (Phone Company): 1.5 Mbps – 20 Mbps

Cable Internet: 12 Mbps – 40 Mbps

Fiber Optic (Internet, or combined with television): 40 Mbps

APPENDIX F

Acronyms

<u>Acronym</u>	<u>Definition</u>	<u>Acronym</u>	<u>Definition</u>
ADD	Associate Deputy Director	MOA	Memorandum of Agreement
AS-IA	Assistant Secretary-Indian Affairs	MOU	Memorandum of Understanding
AYP	Adequate Yearly Progress	NAEP	National Assessment for Educational Progress
BIA	Bureau of Indian Affairs	NASIS	Native American Student Information System
BIE	Bureau of Indian Education	NCLB	No Child Left Behind
CCRS	College and Career Ready Standards	NCAI	National Congress of American Indians
DAS-M	Deputy Assistant Secretary for Management	NIEA	National Indian Education Association
DoDEA	Department of Defense Education Activity	OFECR	Office of Facilities and Environmental and Cultural Resources
DOI	Department of the Interior	OFMC	Office of Facilities Management & Construction
DPA	Division of Performance and Accountability	OIG	Office of Inspector General
ED	Department of Education	OMB	Office of Management and Budget
ELO	Education Line Officer	PARCC	Partnership for Assessment Readiness for College and Careers
ESEA	Elementary and Secondary Education Act	PIAP	Program Improvement and Accountability Plan
FACE	Family and Child Education	SEA	State Education Agency
FBMS	Financial and Business Management System	SIPI	Southwestern Indian Polytechnic Institute
FI&R	Facilities Improvement and Repair	SMARTER BALANCED	Smarter Balanced Assessment Consortium
FTE	Full Time Employee	STEM	Science, Technology, Engineering & Mathematics
GAO	General Accounting Office	TCSA	Tribally Controlled Schools Act
GPRA	Government Performance and Results Act	TCU	Tribal Colleges and Universities
HR	Human Resources	TEA	Tribal Education Agency
IDEA	Individuals with Disabilities Education Act	USDA	United States Department of Agriculture
IEP	Individual Education Plan		
ISEP	Individual Student Equalization Program		
IT	Information Technology		
LEA	Local Education Agency		
MI&R	Maintenance Improvement and Repair		
