



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

# **REVIEW OF ACADEMIC ACHIEVEMENT AT THE PIERRE INDIAN LEARNING CENTER**

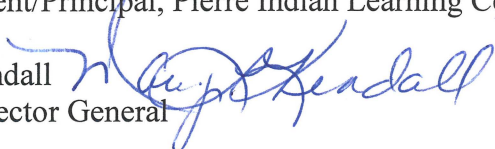


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**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

JUL 13 2015

Memorandum

To: Ms. Veronica Pietz  
Superintendent/Principal, Pierre Indian Learning Center

From: Mary L. Kendall   
Deputy Inspector General

Subject: Inspection Report – Review of Academic Achievement at the Pierre Indian Learning Center  
Report No. C-IS-BIE-0015-2014

This memorandum transmits the findings of our inspection of academic achievement efforts at the Pierre Indian Learning Center. Our objective was to evaluate the programs in place to improve educational achievement at schools funded by the Bureau of Indian Education (BIE). We chose to focus on how BIE worked to close the educational achievement gap and increase the graduation rate.

Please provide us with your written response to this report within 30 days. The response should provide information on actions taken or planned to address the recommendations, as well as target dates and title(s) of the official(s) responsible for implementation. Please send your response to:

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The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

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## Results in Brief

We found that the Pierre Indian Learning Center was not properly assessing the academic needs of its students. The No Child Left Behind Act, signed into law in January 2002, requires schools to complete a comprehensive needs assessment. The purpose of the assessment is to provide the schools with a strategy to help them meet the specific needs of their unique student populations. Completion of the assessment involves—

- systematic identification of strengths and needs in eight areas;
- examination of the nature and cause of each identified need; and
- prioritization of each need, or the cause of that need, for future action.

We found that Pierre Indian Learning Center, an off-reservation boarding school located in Pierre, SD, could not provide a copy of its comprehensive needs assessment. In addition, school officials reported that they only update the assessment every 5 years. As a result, the specific needs of the school's unique student population may remain unknown to school administrators, leaving the school unable to effectively prioritize its resources on an annual basis to ensure the successful educational achievement of its student population.

In addition, school children may have mastered conversational English but may not be able to express themselves effectively using academic English, the formal written, auditory, and visual language used in learning environments. All states require some type of English language learner (ELL) assessment that ranges from simply asking parents to identify the primary language spoken in the home to a formal test administered to all students. We found that Pierre Indian Learning Center officials had administered ELL assessments as required.

We make three recommendations that, if implemented, should improve educational achievement efforts at the Pierre Indian Learning Center.

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# Introduction

## Objective

Our objective was to evaluate the programs in place to improve educational achievement at schools funded by the Bureau of Indian Education (BIE). We chose to focus on how BIE worked to close the educational achievement gap and increase the graduation rate. This report specifically addresses whether Pierre Indian Learning Center: 1) completed a comprehensive needs assessment for the 2013/2014 school year; and 2) incorporates cultural awareness and language assessment in its education program. The scope and methodology for this inspection are included in Appendix 1.

## Background

### Concerns in Indian Education

In May 2013, Secretary Jewell appeared before the Senate Committee on Indian Affairs to discuss Department of the Interior (DOI) priorities in Indian country. Among other issues raised, Committee members expressed concerns about academic achievement at BIE-funded Indian schools. Academic achievement concerns generally fall into one of two broad areas, the achievement gap and graduation rates.

1. **Achievement Gap** - Standardized achievement tests, designed to measure an individual student's knowledge and skill as an indicator of academic progress, are given to students in both public and BIE-funded schools. In general, BIE students lag behind the public school population. Research has found that, as early as grade 4, students attending BIE-funded schools achieve test results below those of their public school counterparts. Furthermore, the higher the grade level, the greater the gap in test scores. For example, if a student reaches grade 12 in a BIE-funded school, that student may be testing at the grade 9 level, while a public school counterpart generally will be testing at the grade 12 level.
2. **Graduation Rates** - BIE calculates graduation rates based on guidance from the Department of Education on a 4-year adjusted cohort or group of statistically similar students, in this case those who entered grade 9 at the same time and stayed in the same school they entered. Cohort numbers may only change by adding students who transfer in later during that same year or over the next 3 years, or by subtracting students who transfer out during that same period as long as the school has documentation supporting where the student has reenrolled. The public school graduation rate averages roughly 76 percent, while the average graduation rate from BIE-funded schools is below 50 percent.

## **Federal Efforts to Improve Indian Education**

Federal laws attempt to provide resources to help improve educational opportunities for all students. The Elementary and Secondary School Act of 1965 was enacted to ensure that all children have fair and equal opportunities to obtain a high-quality education and reach, at a minimum, proficiency on academic achievement assessments. The Act also aimed to help close the achievement gap between high and low achieving students, especially achievement gaps between minority and nonminority students, and between disadvantaged children and their more advantaged peers. It also authorized that funds be made available to meet the unique educational needs of Indian students. The No Child Left Behind Act of 2002 was a reauthorization of the Elementary and Secondary School Act of 1965 and has the same stated purpose of improving academic achievement.

Executive Order 13592, signed by President Obama in December 2011, aimed to close the achievement gap and increase the graduation rate for students by improving educational opportunities for Indian and Alaska Native students, including those attending BIE-funded schools. The executive order specifically promoted efforts to—

- increase kindergarten readiness;
- expand access to college support services;
- increase teacher recruitment in science, technology, engineering, and mathematics (STEM programs); language; and special education subjects;
- support innovative dropout prevention strategies;
- implement pathways for dropouts and adults to reenter education;
- increase college access; and
- meet unique cultural and language needs.

## **Schools Funded by BIE**

BIE provides funds to approximately 185 schools that serve Indian student populations in 23 states. These schools included 119 day schools, 52 boarding schools, and 14 peripheral dormitories. A total of 131 of these schools received BIE funds but operated through grant agreements or contracts. BIE directly operated the remaining 54 schools.

## **Pierre Indian Learning Center**

The Pierre Indian Learning Center, located in Pierre, SD, is a grant-operated off-reservation boarding school for students in grades 1 through 8. Its mission states that “learning is a lifelong sharing process, which is vital to all people. It should draw from the past to help ensure the future.”

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## Findings

The No Child Left Behind Act requires a comprehensive needs assessment be conducted and strategies developed on how to support academic achievement. Pierre Indian Learning Center could not provide a copy of its assessment. As a result, the school may not have an adequate plan in place to ensure students' educational achievement.

Conversely, school officials had administered an English language learner (ELL) assessment. As a result, ELL students were properly identified and should have received the additional support necessary to help them achieve academically.

### Comprehensive Needs Assessment

We found that Pierre Indian Learning Center could not provide a copy of its comprehensive needs assessment, which, we learned, the school updated only every 5 years. As a result, we could not determine whether it addressed any of the eight critical areas related to strengths and the eight critical areas related to needs and priorities.

We identified the critical areas for our analysis by reviewing guidance from the U.S. Department of Education (DOE) as well as needs assessment materials in place in a number of education programs outside BIE. Though not specifically required by statute or regulation, we view these areas as widely accepted in the educational community.

Our discussions with DOE officials also revealed their belief that completion of the comprehensive needs assessment, and actions that keep assessments up-to-date and routinely reviewed, were key steps to ensure every school had a blueprint to keep them on target for improved academic achievement.

Figure 1, below, summarizes our review of Pierre Indian Learning Center's comprehensive needs assessment.

CRITICAL AREA		YES	NO
Is the Assessment Current (2013/2014 School Year)			X
Does the Assessment Identify Strengths related to:			
Demographics		Unable to determine since the school was unable to provide a copy of the assessment.	
Student Achievement			
School Culture and Climate			
Staff Quality, Recruitment and Retention			
Curriculum, Instruction and Assessment			
Family and Community Involvement			
School Organization			
Technology			
Does the Assessment Identify Needs and Priorities related to:			
Demographics		Unable to determine since the school was unable to provide a copy of the assessment.	
Student Achievement			
School Culture and Climate			
Staff Quality, Recruitment and Retention			
Curriculum, Instruction and Assessment			
Family and Community Involvement			
School Organization			
Technology			

Figure 1. Results of Pierre Indian Learning Center comprehensive needs assessment.

Completion of the comprehensive needs assessment involves—

- systematic identification of strengths and needs;
- examination of the nature and cause of each identified need; and
- prioritization of each need, or the cause of that need, for future action.

Even though school officials did not have a systematic process in place to identify student needs, they could outline programs that focused on the needs of their unique student population. For example, the school had what it called a red card program, which helped teachers manage classroom dynamics. When individual students had difficulty focusing on the subject being taught, those students received a red card, essentially a pass, to allow them to go to another room where they received help focusing on that subject. By using this method, the learning of the other students was not disrupted, while the individual students in need of additional assistance also had their needs met.

Teachers also had to complete an assessment of each individual student's academic capabilities and what each student had been working on at the end of each academic year. This assessment then follows the student to his or her teacher the following year so that no instruction time is lost by teachers who may need to



quickly learn the student’s strengths and weaknesses in order to best determine where to start that year’s academic instruction.

Without systematic completion and maintenance of a comprehensive needs assessment, however, the school may find it difficult to determine whether all strengths and needs for every individual student have been identified or prioritized to facilitate academically based future actions on that student’s behalf.

Systematic identification and prioritization of student needs can help decision makers develop school-wide reform strategies that offer increased academic achievement opportunities for school children. The needs assessment might also help decision makers allocate scarce resources wisely in support of students’ educational achievement.

**Recommendations**

We recommend that Pierre Indian Learning Center:

1. Complete a school-specific comprehensive needs assessment by—
  - systematically identifying the strengths and needs associated with its unique school population;
  - identifying the root causes of identified needs;
  - identifying the school’s available resources;
  - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
  - developing a strategy that applies the results of the comprehensive needs assessment, responding to the problems, root causes, and corrective actions identified; and
  - routinely revisiting the strategy to ensure that it continues to address identified needs and contribute to improved academic achievement and, if it does not, modifying it as necessary.
2. Update its comprehensive needs assessment at least annually.
3. Use its comprehensive needs assessment to help make decisions related to prioritizing corrective actions and allocating resources.

**Culture and Language**

The Native American Languages Act of 1990 encourages the use of native languages as a medium of educational instruction to increase student success, performance, educational opportunity, cultural awareness, and community pride,

especially in BIE-funded schools. Likewise, the No Child Left Behind Act declares as national policy “that programs that serve Indian children are of the highest quality and provide for not only the basic elementary and secondary educational needs, but also the unique educational and culturally related academic needs of these children.” We noted that Pierre Indian Learning Center had classes with such a culture component, including a native language class.

National policy allows educational instruction in a native language according to a school’s preference. All assessments to measure academic achievement, however, are given in English. Therefore, a student might come from a home where only English is spoken and be able to communicate fluently in conversational English; however, that same student might not have mastered the more formal written, auditory, and visual language requirements of academic English. Even a highly intelligent student might still struggle in an educational setting if unable to clearly express ideas in the more formal context of academic English. The English language learner (ELL) assessment test has sections in reading, writing, speaking, and listening comprehension that help educators identify students who have mastered conversational but not academic English or terminology used in the STEM programs.

All states require some type of ELL assessment that ranges from simply asking parents to identify the primary language spoken in the home to a formal test administered to all students. We found that Pierre Indian Learning Center officials had administered W-APT<sup>1</sup>, the placement test used by South Dakota to identify ELL students. As a result, ELL students were properly identified and should have received the additional support necessary to help them achieve academically.

School officials reported that they currently have no students identified as ELL. In fact, they found that many students previously identified as ELL were actually suffering from profound hearing loss. As a result, all students are now given a hearing and speech screening from a speech therapist before receiving the W-APT assessment to make sure that they receive the proper treatment and services to enable them to do their best on the W-APT assessment.

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<sup>1</sup> W-APT refers to the “WiDA ACCESS Placement Test,” specifically the Wisconsin, Delaware, and Arkansas’ Assessing Comprehension and Communication in English State-to-State Placement Test, used in various states as an ELL assessment tool.

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# Conclusion and Recommendations

## Conclusion

The comprehensive needs assessment is a planning tool that assists schools to design and prioritize strategies that meet the specific needs of their unique student populations. Pierre Indian Learning Center could not provide a copy of its assessment. In addition, school officials reported that they only update the assessment every 5 years. As a result, the school did not have an adequate plan in place to ensure students' educational achievement.

Conversely school officials had administered an English language learner (ELL) assessment as required. As a result, ELL students were properly identified and should have received the additional support necessary to help them achieve academically.

## Recommendations

We recommend that Pierre Indian Learning Center:

1. Complete a school-specific comprehensive needs assessment by—
  - systematically identifying the strengths and needs associated with its unique school population;
  - identifying the root causes of identified needs;
  - identifying the school's available resources;
  - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
  - developing a strategy that applies the results of the comprehensive needs assessment, responding to the problems, root causes, and corrective actions identified; and
  - routinely revisiting the strategy to ensure that it continues to address identified needs and contribute to improved academic achievement, and, if it does not, modifying it as necessary.
2. Update its comprehensive needs assessment at least annually.
3. Use its comprehensive needs assessment to help make decisions related to prioritizing corrective actions and allocating resources.

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# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to the programs in place at the Pierre Indian Learning Center to improve educational achievement. We performed the same inspection at 15 other schools funded by the Bureau of Indian Education (BIE) including:

- Tonalea Day School
- Lukachukai Community School
- Tuba City Boarding School
- Flandreau Indian School
- Moencopi Day School
- Sicangu Owayawa Oti (Rosebud Dormitory)
- Cherokee Central Schools
- Ahfachkee Indian School
- Miccosukee Indian School
- Chemawa Indian School
- Yakama Nation Tribal School
- Paschal Sherman Indian School
- Ojo Encino Day School
- Te Tsu Geh Oweenge Day School
- San Ildefonso Day School

We also performed separate reviews at the Pierre Indian Learning Center to evaluate the programs in place at schools funded by BIE to prevent violence and assess the condition of educational facilities. The results of those reviews will be presented in separate reports.

## Methodology

We conducted this review from January 2014 to August 2014 in accordance with the Quality Standards for Inspections and Evaluations as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions.

To address our objective—

- we reviewed criteria (e.g., laws, regulations, policies, and procedures); studies; prior reports; and school documentation;
- we interviewed officials at the Department of Education's Office of Student Achievement and School Accountability, Office of Indian Education, and the Academic Improvement Group; BIE's Division of Performance and Accountability; and Pierre Indian Learning Center; and
- we visited Pierre Indian Learning Center on January 30, 2014.

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