



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

# **REVIEW OF ACADEMIC ACHIEVEMENT AT THE MOENCOPPI DAY SCHOOL**



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U.S. DEPARTMENT OF THE INTERIOR

Memorandum

FEB 19 2015

To: Rebecca Fred  
Acting Principal, Moencopi Day School

From: Mary L. Kendall  
Deputy Inspector General

Subject: Inspection Report – Review of Academic Achievement at the Moencopi Day School  
Report No. C-IS-BIE-0017-2014

This memorandum transmits the findings of our inspection of academic achievement efforts at the Moencopi Day School. 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 specifically on how BIE worked to close the educational achievement gap and increase the graduation rate.

After you have had an opportunity to review our report, we welcome your feedback and encourage you to provide us with any comments by March 2, 2015. If you have any questions, please contact Lorelee Bennett at 303-236-9139.

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 Moencopi Day School 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We found that Moencopi Day School, located on the Hopi Reservation adjacent to Tuba City, AZ, had an outdated needs assessment that did not address all required assessment areas. Since the Moencopi assessment was incomplete, specific needs of the school's unique student population may remain unknown to school administrators, leaving the school unable to effectively prioritize its resources to ensure the successful educational achievement of its student population.

In addition, school children may have mastered conversational English and yet still struggle to express themselves effectively using academic English, the formal written, auditory, and visual language used in learning environments. The English language learner (ELL) assessment test required of schools in Arizona has sections in reading, writing, speaking, and listening comprehension that helps schools identify students who may have mastered conversational English but not academic English. We found, however, that Moencopi Day School officials had not administered ELL assessments as required by the State. As a result, the school might not have been identifying students most in need of additional support.

We make three recommendations that, if implemented, should improve educational achievement efforts at the Moencopi Day School.

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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 specifically on how BIE worked to close the educational achievement gap and increase the graduation rate. The scope and methodology for this inspection are included in Appendix 1.

## Background

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 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.

Most recently, in the 2013/2014 school year, BIE provided funds to 185 schools in 23 states that serve Indian student populations. 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 directly through grant agreements or contracts. BIE operated the remaining 54 schools.

The Moencopi Day School, located adjacent to Tuba City, Arizona, on the Hopi Reservation, is a grant operated day school for students in kindergarten through grade 6. Its mission states that it provides “a positive and safe learning environment, where all students will be academically successful while integrating the uniqueness of their heritage.”

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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. Moencopi Day School's assessment was more than a year old, as well as incomplete. As a result, the school did not have an adequate plan in place to ensure students' educational achievement.

School officials also had not administered an English language learner (ELL) assessment, which would have identified students needing additional language support.

### Comprehensive Needs Assessment

Moencopi Day School's comprehensive needs assessment, dated October 11, 2012, showed no evidence that it had been updated for the current school year. In addition, it did not address seven of eight critical areas related to strengths and seven of eight critical areas related to needs and priorities.

CRITICAL AREA	YES	NO
Is the Assessment Current (2013/2014 School Year)		X
Does the Assessment Identify Strengths related to:		
Demographics		X
Student Achievement	✓	
School Culture and Climate		X
Staff Quality, Recruitment and Retention		X
Curriculum, Instruction and Assessment		X
Family and Community Involvement		X
School Organization		X
Technology		X
Does the Assessment Identify Needs and Priorities related to:		
Demographics		X
Student Achievement		X
School Culture and Climate		X
Staff Quality, Recruitment and Retention		X
Curriculum, Instruction and Assessment	✓	
Family and Community Involvement		X
School Organization		X
Technology		X

Figure 1. Results of Moencopi comprehensive needs assessment from October 11, 2012.

Our discussions with Department of Education (DOE) officials also revealed their belief that completion of the comprehensive needs assessment, as well as 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. 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.

During our visit to Moencopi Day School, we noted an absence of a systematic process to identify the school's strengths and needs. For example, when we asked school administrators about the availability and use of substitute teachers, we learned that the school's guidance counselor had been teaching grade 1 as a substitute teacher since the beginning of the 2013/2014 academic year, 5 months prior to our visit. This full-time teaching assignment left the counselor without time to perform the services the school originally hired the counselor to perform (e.g., home visits, child studies, or student counseling).

Although using the guidance counselor as a long-term substitute might have been appropriate, we could not evaluate whether this represented the best use of school resources because the comprehensive needs assessment had not identified detailed information on population demographics. For instance, to determine such staffing allocations, the school could have collected and analyzed information on attendance and mobility rates, including where students were moving to and from.

Demographic data is one area over which a school has little control, but such data can have a big impact on the learning environment and student achievement. The information could be used to assess the expected workload of the guidance counselor (e.g., performing home visits, conducting student counseling, and leading child studies from which recommendations are made for placement into special education programs). Without such detailed information, a clear determination cannot be made on whether using the guidance counselor as the grade 1 teacher was the best use of school resources.

We also identified the absence of a systematic examination of the nature and cause of each identified school need. For example, Moencopi identified a need to provide extensive professional development for teachers and administrators as a remedy for poor student achievement. While the comprehensive needs assessment identified poor student achievement as a problem, the cause of the problem was not specifically identified. The school's method of determining that professional development for teachers offered an effective solution remains unclear.

Further, during our visit to Moencopi Day School, the acting principal told us that a combination of limited bandwidth and outdated computers caused school devices to freeze up. School officials reported that these technological problems caused students to grow bored during testing and subsequently begin clicking



buttons haphazardly to finish the test. This may suggest a different cause of poor student achievement results, rather than a need for professional development.

In addition, as online educational resources increasingly supplement or even replace printed materials, limited bandwidth has become a significant problem. We found that limited bandwidth restricts access to educational resources for both students and staff. As a result, a student’s inability to access the most up-to-date online resources may, in part, contribute to poor student achievement results. Without a systematic examination and identification of the root cause of each identified need, a school may expend scarce resources on activities that will not fix the problem.

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.

**Recommendation**

We recommend that Moencopi Day School:

- I. 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.

**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 Moencopi Day School provides classes with such a cultural component. Specifically, all students participate in classes that strengthen their use of the Hopi spoken and written language. Students are also taught about Hopi history and attend an agricultural class to develop skills to continue the Hopi “self-sustaining ideology.”

While cultural classes are provided, all assessments to measure academic achievement 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.

Moencopi Day School officials have not administered ELL assessments. As a result, the school might not be able to identify students most in need of additional support or provide them with the tools necessary to help close the achievement gap. Students identified as ELL generally do not have the academic English language ability to achieve their full academic potential in school and, thus, might be less successful on standardized assessments. Once properly identified, ELL students can receive additional instruction and support in the classroom to help them understand their lessons.

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. Arizona requires all schools within the state, including BIE-funded schools, to administer the Arizona English Language Learner Assessment (AZELLA) to all students. Moencopi Day School has not administered AZELLA, and thus might be missing critical information about students’ needs.

## Recommendations

We recommend that Moencopi Day School:

2. Administer AZELLA as required.
3. Develop a plan to meet the academic needs of each student identified as an ELL on the AZELLA.

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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. Moencopi Day School's comprehensive needs assessment, however, was outdated and did not address all required areas. As a result, the school did not have an adequate plan in place to ensure students' successful educational achievement.

Moencopi Day School officials also had not administered ELL assessments. As a result, the school may not have been identifying students most in need of additional academic support.

## Recommendations

We recommend that Moencopi Day School—

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. Administer AZELLA as required.
3. Develop a plan to meet the academic needs of each student identified as an ELL on the AZELLA.

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# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to the programs in place at the Moencopi Day School 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
- Sicangu Owayawa Oti
- Pierre Indian Learning Center
- Cherokee Central Schools
- Ahfachkee Indian Schools
- 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 Moencopi Day School 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) pertaining to Indian children; studies; prior reports; and school documentation, including the October 2012 comprehensive needs assessment from Moencopi Day School;
- 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 Moencopi Day School; and

- we visited Moencopi Day School on January 17, 2014.

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