



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

REVIEW OF ACADEMIC ACHIEVEMENT AT THE CHEROKEE CENTRAL SCHOOLS




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

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Memorandum

To: Scott Penland
Superintendent, Cherokee Central Schools

Beverly Payne
Assistant Superintendent, Cherokee Central Schools

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Academic Achievement at the Cherokee Central Schools
Report No. C-IS-BIE-0020-2014

This memorandum transmits the findings of our inspection of academic achievement efforts at the Cherokee Central Schools (CCS). We visited CCS in February of 2014, then conducted a follow-up site visit in August 2015 to clarify some of our initial findings. The objective of our inspection 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:

Kimberly Elmore
Assistant Inspector General
Office of Audits, Inspections, and Evaluations
U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428
1849 C Street, NW
Washington, DC 20240

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 Cherokee Central Schools (CCS) were properly assessing the academic needs of a portion of their 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 CCS, located on the Cherokee Reservation in Cherokee, NC, had mostly complete comprehensive needs assessments for a portion of its student population, thus, the specific needs of those students should have been known to school administrators. The comprehensive needs assessments, however, did not extend to the elementary school. The needs of the elementary school's unique population, therefore, may be unknown to school administrators, potentially leaving CCS unable to effectively prioritize its resources to ensure the successful educational achievement of its entire 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 CCS officials had administered ELL assessments as required.

We make one recommendation that, if implemented, should improve educational achievement efforts at Cherokee Central Schools.

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 Cherokee Central Schools (CCS): 1) completed a comprehensive needs assessment; and 2) incorporates cultural awareness and language assessment in its education programs. 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.

Cherokee Central Schools

The Cherokee Central Schools, located on the Cherokee Reservation in Cherokee, NC, are grant-operated day schools for students in kindergarten through grade 12. CCS is comprised of an elementary school, a middle school and a high school all located on the same campus. Their mission statement declares: “The Cherokee Central School System is committed to empowering our students, preserving our Nation, and ensuring our future.”

Findings

The No Child Left Behind Act requires a comprehensive needs assessment be conducted and strategies developed on how to support academic achievement. Cherokee Central Schools had comprehensive needs assessments for the middle school and the high school, but not for the elementary school. As a result, the elementary school may not have adequate plans in place to ensure its students' educational achievement.

In addition, school officials had administered an English language learner (ELL) assessment to properly identify students' English language proficiency.

Comprehensive Needs Assessment

In response to our request to see their comprehensive needs assessments, CCS staff provided us with a School Improvement Grant school improvement checklist and a needs assessment tool that they complete annually for the middle school and high school. We found that these assessments addressed seven of the eight critical areas related to strengths, and seven of 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 (ED) 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 ED 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 Cherokee Central Schools' comprehensive needs assessment.

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

Figure 1. Results of Cherokee Central Schools comprehensive needs assessments.

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.

The assessments CCS provided did not include any formal discussion regarding the schools' technological strengths or needs, although we observed computer labs during our follow-up visit in August 2015. In these labs, students took the Measures of Academic Progress test. We also learned that this year's cohort of elementary school students was the largest CCS has had, with slightly more than 600 students. Though elementary students take a number of assessments requiring time and resources, the elementary school principal noted her school does not conduct a comprehensive needs assessment like the middle school and high school. She acknowledged, however, that the school could probably benefit from doing one.

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 Cherokee Central Schools:

- I. Consider completing an elementary school-specific comprehensive needs assessments by—
 - systematically identifying the strengths and needs associated with their unique school populations;
 - identifying the root causes of identified needs;
 - identifying the schools' available resources;
 - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
 - developing strategies that apply the results of the comprehensive needs assessment, responding to the problems, root causes, and corrective actions identified; and
 - routinely revisiting the strategies to ensure that they continue to address identified needs and contribute to improved academic achievement, and, if they do not, modifying them 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 Cherokee Central Schools provided classes with such cultural components. Specifically, all classes were required to include a Cherokee aspect; such as Cherokee numbers, colors, or letters. In addition, different culture electives, such as Cherokee language classes, art, and wood carving, were offered in the high school. Finally, an elementary afterschool program offered Cherokee chorus and dance.

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. The parents of new CCS students are asked if their children speak a language other than English in the home.¹ Should they provide a positive response, the student is then given the W-APT,² placement test. During our follow-up site visit, CCS officials told us they had tested students' English language proficiency. As a result, ELL students had been identified and received the additional support necessary to help them achieve academically.

¹ This is done through the Home Language Survey which parents must complete. The survey includes question 2, asking "what language did your child first learn to speak?" and question 3, also asking "what language does YOUR CHILD use most at home?" If the answer to either question is "a language other than English," the school has to give the student the W-APT placement test.

² W-APT refers to the "WIDA ACCESS Placement Test," specifically the WIDA Assessing Comprehension and Communication in English State-to-State Placement Test, used in various states as an ELL assessment tool.

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. Cherokee Central Schools had comprehensive needs assessments for only a portion of its student population. As a result, CCS is limited in its ability to effectively prioritize its resources to ensure the successful educational achievement of its entire student population.

Officials at Cherokee Central Schools also administered an English language learner (ELL) assessment. As a result, CCS had identified students most in need of additional academic support.

Recommendations

We recommend that Cherokee Central Schools:

1. Consider completing an elementary school-specific comprehensive needs assessments by—
 - systematically identifying the strengths and needs associated with their unique school populations;
 - identifying the root causes of identified needs;
 - identifying the schools' available resources;
 - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
 - developing strategies that apply the results of the comprehensive needs assessments, responding to the problems, root causes, and corrective actions identified; and
 - routinely revisiting the strategies to ensure that they continue to address identified needs and contribute to improved academic achievement, and, if they do not, modifying them as necessary.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to programs in place at the Cherokee Central Schools 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
- Moencopi Day School
- Flandreau Indian School
- Sicangu Owayawa Oti (Rosebud Dormitory)
- Pierre Indian Learning Center
- 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 Cherokee Central Schools 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 February 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 Cherokee Central Schools; and

- we visited Cherokee Central Schools on February 11, 2014, and again on August 18, 2015 in order to clarify some of our initial findings.

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By Mail: U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428 MIB
1849 C Street, NW.
Washington, DC 20240