



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

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Memorandum

To: Ann Marie Bledsoe Downes
Acting Director, Bureau of Indian Education

From: Kimberly Elmore *Kimberly Elmore*
Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Management Advisory – Summary of Bureau of Indian Education Academic Achievement Inspections
Report No. 2015-CR-073

In this advisory, we summarize a series of inspections our office conducted to review programs in place to improve educational achievement at schools funded by the Bureau of Indian Education (BIE). We visited 16 schools (see Attachment), determining if a comprehensive needs assessment had been completed, if classes containing a cultural component were provided, and if students were tested for English language proficiency. We made a number of recommendations for improvements and understand that some of the schools have already begun implementing them.

Background

The No Child Left Behind Act required schools to conduct a comprehensive needs assessment and develop strategies to support academic achievement.¹ Executive Order 13952, signed by President Obama in December 2011, specifically promoted efforts to (among other things) meet the unique cultural and language needs of Indian and Alaska Native students, including those attending BIE-funded schools. Also, 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 – yet, all States require some type of English language learner assessment for students. For these inspections, then, we specifically focused on whether schools 1) completed a comprehensive needs assessment and 2) incorporated cultural awareness and language assessment into their education programs.

In the 2013/2014 school year, BIE provided 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. Between January and May 2014, in conjunction with our BIE violence prevention

¹ In December 2015, the No Child Left Behind Act was replaced by the Every Student Succeeds Act of 2015.

inspections,² we visited a non-statistical selection of 16 BIE-funded schools (see Attachment 1). We reviewed documents provided by school officials in response to our request to review their comprehensive needs assessment. In addition, we determined if schools provided students with classes containing a cultural component, and we asked if students were being tested for English language proficiency per their State’s requirement.³

Findings

Schools Should Complete (Or Update) Their Comprehensive Needs Assessments

Completion of a comprehensive needs assessment generally 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 site visits, we asked school officials to provide us with their current comprehensive needs assessment. In response, we received a wide variety of documents, including general school planning documents, individual student assessments, supporting materials required for School Improvement Grants (SIG), and, in one case, a formal needs assessment conducted by a third party. Despite what appeared to be unfamiliarity with the term “comprehensive needs assessment,” school officials apparently knew their school’s needs and that steps had been taken to document them in some general form. Thus, we reviewed the different “assessments” for their coverage of the school’s strengths, needs, and priorities in eight critical areas that, although not specifically outlined in statute or regulation, are viewed as widely accepted in the education community (Figure 1).

CRITICAL AREA
Does the Assessment Identify Strengths, 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

Figure 1. Critical areas identified and used for this inspection.

² “Management Advisory – Summary of Bureau of Indian Education Violence Prevention Inspections” (Report No. 2015-CR-074)

³ Sicangu Owayawa Oti in Mission, SD, was a dormitory and, therefore, was not required to assess the academic needs of its students. The dormitory had a cultural program, however, and thus was included in our review.

Eleven of the 16 schools we visited provided us with an updated assessment for the 2013/2014 school year. A majority of the schools had assessed their needs and priorities related to the categories of Student Achievement and Curriculum, Instruction and Assessment (10 schools and 11 schools respectively), but less than half the schools provided assessments that described their needs and priorities in the remaining 6 critical areas.

Only one school, Miccosukee Indian School, provided a comprehensive needs assessment that fully covered the school's strengths, needs, and priorities in all eight critical areas. For their comprehensive needs assessment, Cherokee Central Schools, which consists of an elementary, middle, and high school, provided us with their supporting documentation for the SIG pertaining to their middle school and high school. Their assessments were also comprehensive, covering all but one critical area—technology. Cherokee Central Schools did not have an assessment for their elementary school, however. So, with the exception of Miccosukee Indian School, we encouraged the remaining schools to take a more holistic approach to their comprehensive needs assessments, and primarily recommended they complete (or update, as applicable) 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.

Only 10 Schools Assessed their Students' English Language Proficiency Per Their State's Requirements.

During our inspection work, we also determined whether the schools we visited provided students with courses or programs containing a cultural or language component. We noted that 12 of the 16 schools provided students with some form of cultural learning, whether by integrating tribal culture and language concepts into normal coursework, providing specific culture or language classes or programs, or offering students community-sponsored cultural courses on school grounds (i.e., Te Tse Geh Oweenge School). At two additional schools—Flandreau Indian School and San Ildefonso Day School—we could not confirm if actual cultural or language courses were offered, but both schools had designated cultural staff, presumably to assist students with cultural learning.

Although national policy allows educational instruction in a native language according to a school's preference, all assessments to measure academic achievement are given in English. Although a student might come from a home where only English is spoken and be able to communicate fluently in conversational English, that same student might not have mastered the

more formal written, auditory, and visual language requirements of academic English. Therefore, during our inspections we asked school officials about their English Language Learner (ELL) proficiency testing.

The ELL assessment has sections in reading, writing, speaking, and listening comprehension that help educators identify students who have mastered conversational but not the academic English or terminology used in the STEM programs. At the time of our review, all States required some type of ELL assessment that ranged from simply asking parents to identify the primary language spoken in the home to a formal test administered to all students. Of the schools we visited, 10 assessed whether students entering their school were English Language Learners—

- Tonalea Day School;
- Lukachukai Community School;
- Tuba City Boarding School;
- Flandreau Indian School;
- Pierre Indian Learning Center;
- Cherokee Central Schools;
- Chemawa Indian School;
- Paschal Sherman Indian School;
- Ojo Encino Day School; and
- San Ildefonso Day School.

Our primary recommendation to the remaining five schools was to assess students' English language proficiency as required and develop plans to meet the academic needs of each student identified as an ELL on the formal assessments.

Conclusion

We provided each school we visited with a final report documenting our findings and recommendations. We also encouraged school officials to respond to our recommendations, outlining information on the actions taken or planned to address them. We were pleased that the following schools provided us information on their varying efforts to implement our recommendations:

- Tonalea Day School;
- Cherokee Central Schools;
- Ahfachkee Indian School;
- Ojo Encino Day School;
- Te Tsu Geh Oweenge School; and
- San Ildefonso Day School.

We will not formally track each individual school's implementation of our recommendations but suggest that BIE do this.

We understand the educational environment for BIE-funded schools has changed with the replacement of the No Child Left Behind Act and with BIE's 2014 restructuring targeted at improving BIE operational support to schools, as well as providing customized technical assistance to tribes to operate their own schools. Regardless, we still believe schools should assess their strengths, needs, and priorities in a holistic, comprehensive manner and meet their State requirements in terms of testing students' English language proficiency.

We have provided this information for your evaluation and action, as you determine appropriate. If you have any further questions or need further information, please contact me at 202-208-5745.

Schools Visited

Facility Name	Location	Grades	Date Visited	Report No.
Tonalea Day School	Tonalea, AZ	K-8	January 14, 2014	C-IS-BIE-0018-2014
Lukachukai Community School	Lukachukai, AZ	K-8	January 15, 2014	C-IS-BIE-0016-2014
Tuba City Boarding School	Tuba City, AZ	K-8	January 16, 2014	C-IS-BIE-0019-2014
Moencopi Day School	Tuba City, AZ	K-6	January 17, 2014	C-IS-BIE-0017-2014
Flandreau Indian School	Flandreau, SD	9-12	January 28, 2014	C-IS-BIE-0013-2014
Sicangu Owayawa Oti (Rosebud Dorm)	Mission, SD	1-12	January 29, 2014	C-IS-BIE-0014-2014
Pierre Indian Learning Center	Pierre, SD	1-8	January 30, 2014	C-IS-BIE-0015-2014
Cherokee Central Schools	Cherokee, NC	K-12	February 11, 2014 & August 18, 2015	C-IS-BIE-0020-2014
Ahfachkee Indian School	Clewiston, FL	PreK-12	February 13, 2014	C-IS-BIE-0021-2014
Miccosukee Indian School	Miami, FL	K-12	February 14, 2014	C-IS-BIE-0022-2014
Chemawa Indian School	Salem, OR	9-12	April 28, 2014	C-IS-BIE-0026-2014
Yakama Nation Tribal School	Toppenish, WA	8-12	April 30, 2014	C-IS-BIE-0028-2014
Paschal Sherman Indian School	Omak, WA	K-9	May 1, 2014	C-IS-BIE-0030-2014
Ojo Encino Day School	Cuba, NM	K-8	May 20, 2014	C-IS-BIE-0034-2014
Te Tsu Geh Oweenge School	Santa Fe, NM	K-6	May 21, 2014	C-IS-BIE-0036-2014
San Ildefonso Day School	Santa Fe, NM	K-6	May 22, 2014	C-IS-BIE-0038-2014