



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

# **REVIEW OF ACADEMIC ACHIEVEMENT AT THE LUKACHUKAI COMMUNITY SCHOOL**




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

**APR 28 2015**

Memorandum

To: Mr. Arthur Ben  
Principal, Lukachukai Community School

From: Mary L. Kendall   
Deputy Inspector General

Subject: Inspection Report – Review of Academic Achievement at the Lukachukai  
Community School  
Report No. C-IS-BIE-0016-2014

This memorandum transmits the findings of our inspection of academic achievement efforts at the Lukachukai Community 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.

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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## Results in Brief

We found that the Lukachukai Community School, located on the Navajo Reservation in Lukachukai, AZ, 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 Lukachukai Community School had a comprehensive needs assessment that did not address all required areas. Since the Lukachukai 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 but may not be able 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 that Lukachukai Community School officials had administered ELL assessments as required by the State.

We make one recommendation that, if implemented, should improve educational achievement efforts at the Lukachukai Community 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 Lukachukai Community School, located on the Navajo Reservation in Lukachukai, AZ, is a grant-operated boarding school for students in kindergarten through grade 8. Its goal is to “help children grow in harmony within the dominant and global societies.”

# Findings

The No Child Left Behind Act requires a comprehensive needs assessment be conducted and strategies developed on how to support academic achievement. Lukachukai Community School’s assessment was incomplete. 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.

## Comprehensive Needs Assessment

Lukachukai Community School’s comprehensive needs assessment showed no evidence that it had been updated for the current school year. In addition, it did not address any of the eight critical areas related to strengths or any of the eight critical areas related to needs and priorities.<sup>1</sup>

CRITICAL AREA	YES	NO
Is the Assessment Current (2013/2014 School Year)		X
<b>Does the Assessment Identify Strengths related to:</b>		
Demographics		X
Student Achievement		X
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
<b>Does the Assessment Identify Needs and Priorities related to:</b>		
Demographics		X
Student Achievement		X
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

<sup>1</sup> These critical areas were used for our analysis because they are widely accepted in the education community.

Figure 1. Results of Lukachukai comprehensive needs assessment.

Our discussions with U.S. 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.

Review of the comprehensive needs assessment provided by the school revealed the absence of a systematic approach to the assessment's completion. Instead, the assessment seemed to be the school's planning document outlining improvements it wanted to implement. The desired improvements, however, were not tied to any needs, weaknesses, or underlying causes of deficiencies. In fact, by their nature, improvements need not address deficiencies. A comprehensive needs assessment, however, should systematically identify and examine needs, as well as prioritize corrective actions associated with each need identified or the cause of that need.

For example, one of the improvements outlined in the plan was that “all teams prepare agendas for their meetings.” The plan indicated that the possible improvement had been listed since January 2012 with limited development but with the “highest” priority score for implementation. Another improvement outlined in the plan was that “all teachers maintain well-organized student learning materials in the classroom.” The plan indicated that the possible improvement had been listed since January 2012, again with limited development and a “medium” priority score for implementation. The plan does not indicate, however, how implementation of these improvements would address any deficiencies in instruction or improve overall academic achievement.

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 Lukachukai Community 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 Lukachukai Community School provides classes with such a cultural component.

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. Arizona requires all schools within the state, including BIE-funded schools, to administer the Arizona English Language Learner Assessment (AZELLA) to all students. We found that Lukachukai Community School officials had administered AZELLA as required. As a result, ELL students were properly identified and should have received the additional support necessary to help them achieve academically.

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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. Lukachukai Community School's comprehensive needs assessment, however, did not address required areas. As a result, the school did not have an adequate plan in place to ensure students' successful 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 Lukachukai Community 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.

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# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to the programs in place at the Lukachukai Community 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
- Tuba City Boarding School
- Moencopi Day 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 Lukachukai Community 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); 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 Lukachukai Community School; and
- we visited Lukachukai Community School on January 15, 2014.

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