

# Tribal Education Departments National Assembly



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VIA EMAIL ONLY

American Indian Education Study Group  
IAEDSolutions@BIA.GOV

Dear Study Group:

The Tribal Education Departments National Assembly ("TEDNA") is writing this letter in response to your request for insight or suggested solutions regarding the educational challenges experienced in Bureau of Indian Education ("BIE") operated, private, and public schools. TEDNA is composed of various Tribal Education Departments and Agencies and is therefore in a good position to provide insight and solutions to current challenges in BIE funded schools. Below is a list of suggestions for the improvement of BIE funded schools. Some of these suggestions are specific to certain Tribal Education Agencies ("TEA"), and some are not. If the suggestion is specific to a certain TEA, we will so indicate. Likely, however, these suggestions will apply across the board.

- BIE should ensure that it has greater communication and consultation with Tribes and TEAs. Consultations should be held in more regional areas to ensure more participation from smaller Tribes and TEAs. Technical assistance should also be provided through regional offices, not all through Albuquerque. Many tribes do not have easy access to an airport, and it is difficult to travel to Albuquerque.
- BIE should ensure that the advice that comes out of Technical Assistance trainings is the same across the board so that there are not inconsistencies and the message is the same.
- BIE needs to be a more stand-alone type of organizational unit. Many issues arise from having to deal with separate agencies for separate functions. One example is construction. The School may have to deal with BIE on many issues, but then deal with Bureau of Indian Affairs ("BIA") for construction. This causes confusion and inefficiency.

- Generally, the school construction program has been a slow and painstaking process. This process needs to be streamlined and restructured to be more efficient.
- Interior, BIE, and BIA should implement a program for TEA infrastructure and capacity building under the Interior TEA authorization that has never been funded. *See* 25 U.S.C. § 2020. TEAs can provide relief administratively and substantively to BIE if they are trained sufficiently on an annual basis and given an opportunity to grow.
- BIE should hold annual professional development trainings with BIE funded schools, similar to SEAs and Department of Defense Schools.
- BIE accountability measures should be more directly tied to each community. To enable tribal schools to meet community needs, BIE should consider implementing, where appropriate, required Cultural Standards for educators. BIE could create and send out a template so that each tribe/school could adapt the cultural standards to their specific local.
- BIE should look to models that are succeeding and implement processes to mirror those models. BIE could look to TEAs, LEAs, and SEAs that are succeeding and see what they are doing and what BIE is not doing but could be.
- The Northern Cheyenne Nation has the following insight and suggestions:
  - TEAs generally have to jump through federal and state hoops as well as dealing with tribal concerns. BIE should seek to limit the administrative inefficiencies so that TEAs can focus more on substantive work.
  - One of the biggest concerns Northern Cheyenne has is the construction program. They have a 100 year old building for their school. It has no new technology and is dilapidated. BIA has given the Northern Cheyenne some temp buildings, but there was nothing that went with them. Thus, these buildings are not in use. Further, if they don't have computers and new instruction materials, the buildings can only go so far.
  - BIE never responds to requests (email, phone, letter), and therefore the TEA can't move past certain issues if they need approval or have questions.
  - Housing for teachers is very inadequate. As a result, Northern Cheyenne cannot get and keep qualified teachers. The teachers have to travel from Billings, which is far away, and if there is inclement weather than there may not be class that day. Housing is a priority that needs to be addressed.
  - Northern Cheyenne did have some accreditation issues. While there are some burdensome reporting requirements for BIE, BIE does nothing with the reports once it gets them. There should be some minimal oversight for the schools to ensure they are on track.

- Native STAR has too many indicators to try and meet. Northern Cheyenne has to meet over 100 indicators. This is too burdensome and needs to be streamlined. Further, there needs to be more technical assistance on how to meet those indicators. They have five schools to deal with, and they have a small staff. Three people have to work on these indicators, when it should not be so burdensome. This leaves less people to work on more pressing matters.
- Because everything goes through Albuquerque it is a pain. People always have to travel to Albuquerque for training, questions go through there, etc. This is in line with the suggestion that consultations and technical assistance should be provided regionally and locally.
- The Sault Ste. Marie Tribe of Chippewa Indians has the following insight and suggestions:
  - The Education Line Officer sends documents to the TEA and a contracted Public School Academy, when those documents should only come to the TEA. This practice should stop.
  - The Tribe has been waiting for years, literally years, for an inspection to be conducted by the BIE Albuquerque Office to finalize occupancy permits. The Albuquerque office has still not come out to do the necessary inspections to finalize the permits. This and other inefficiencies needs to be corrected.
  - There is a difference in being a grant school and a BIE school. Sault Ste. Marie operates a grant school. When BIE treats them identically to a BIE school issues can arise. One example is with the Facilities items and the systems the BIA operated schools have to input data in order to get the O & M Funding. Our entry is more just to justify what we need. The other is how the funds come to us via ASAP. This was a big issue as BIE kept wanting the schools duns number and not the tribe. But with us being a grant it is the tribe that gets the funds not the school.
  - Questions asked of the Education Line Officer are responded to verbally with well-intentioned opinions and best guesses, rather than with answers in writing for which a federal regulation or agency policy can be referenced.
  - A repeated request for a copy of a letter acknowledging receipt of our original grant application has not been fulfilled. We believe this letter will confirm that we always intended our grant school to operate K-12 eventually. It has been difficult to get clarification from BIE regarding our interest to expand our grant school to include a high school.
- Leech Lake Band of Ojibwe
  - They have been trying to get new school for a long time. The current building does not have sufficient heating, it leaks, and there is a roof issue. Children have to wear their

coats in class in the winter. Leech Lake is supposed to be a high priority, but nothing has come of it yet. This needs to be addressed.

- BIE should promote greater data collection between TEAs, LEAs, and SEAs. BIE should share data agreements that it has in place so others can look at models to use and obtain data on their students. Data is critical to improving scores and attendance.
- BIE generally has outdated policies that don't meet the needs in education. The policies are disjointed with overlap with SEAs and LEAs as well. These policies should be looked at and revised to simplify and do away with inefficiencies.
- BIE should compile a comprehensive report on the various methodologies used for funding BIE schools of all types. Information such as what is method for base funding, transportation, operating and expenses, and school construction, along with the various legal authorities for that funding should be included. Such a comprehensive report would provide TEAs with helpful information and it would provide BIE staff with helpful information when there is staff turnover. The funding contributes to the disjointed policies and a report or guide would be very useful.
- Employee turnover of BIE administrators also contributes to inefficiencies. A model or guidebook for new employees and TEAs would be useful. Such a guidebook could provide what the policy and practice is when the BIA and BIE interact with each other and outline which entity has authority for which areas.
- BIE has not yet released the standardized test scores to the Schools. These scores are essential to determine if AYP was met, and BIE needs to release those scores as soon as possible.

Should you have any questions regarding these suggestions, feel free to contact me.

Sincerely,



Quinton Roman Nose  
Executive Director