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January 12, 2018

ATTN: Ms. Paulina Bell
Bureau of Indian Education
United States Department of the Interior
1849 C Street, NW, Mail Stop 3609
Washington, D.C. 20240

RE: BIE Draft Strategic Plan Consultation Comments – 82 FR 48241

To Whom It May Concern:

The Tribal Education Departments National Assembly, Co. (TEDNA) respectfully submits necessary comments on the Federal Register Notice #82 FR 48241 soliciting comments regarding the “Bureau of Indian Education (BIE), Strategic Direction” as dated September 2nd, 2017:

The proposed strategic plan clearly describes the agency’s vision, however lacks explaining practical implementation strategies that comprehensively partner with Tribal Education Departments (TEDs) in the fulfillment of the Bureau’s ultimate strategic direction. Acknowledging Bureau’s intent to provide high quality-educational services at Bureau funded schools, TEDNA recommends this strategic plan:

Develop a collection of resources, practitioners, and partnerships centered around five total Technical Assistance Priorities (TAPs). Per Strategic Goal 5.2 “Support Tribal Education Capacity-Building” the following list will assist the U.S. Department of Interior, Bureau of Indian Education in the completion of its 2017 Strategic Direction and capacity building assistance to Tribal Education Departments as provided by 25 U.S.C. §2020. Each priority must include professional development opportunities, where the Bureau should:

1. Clarify the Identification and Navigation of Learning Environment Barriers¹, by:

- a. Strengthening non-academic environmental factors that consistently encourage innovative, challenging, and culturally competent learning.
- b. Sustaining implementation practices despite staff turnover at both macro and micro levels within departmental-agency hierarchies².
- c. Formalizing departmental-agency frameworks for TED/TEAs to implement cross-program collaboration based on identified priorities.

¹ **Goal 1: Strategy 1.1** “Establish Partnerships and Addressing Barriers” per BIE Strategic Direction as of 09/02/2017

² **Goal 3: Strategy 3.1** “Recruitment/Development of Staff” per BIE Strategic Direction as of 09/02/2017

- 2. Assist in the codification of TED/TEA authorities, by:**
 - a. Increasing the administrative knowledgebase around the importance of adopting and enforcing tribal education ordinances.
 - b. Examining the practical value of comprehensive behavioral health³, curriculum plans and ultimately improving them.
 - c. Building incremental efforts to increase overall departmental-agency capacity centralizing programming and reducing wasteful redundancy⁴.
- 3. Provide professional development for TED/TEA Student Data and management systems, by:**
 - a. Increasing the collection of student data using technology the improve educational pathways, fiscal responsibility, and outcomes.
 - b. Managing student data to promote data-driven decision making that informs employees, parent/guardians, and elected leaders⁵.
 - c. Navigating the Family Educational Rights and Privacy Act (FERPA) to strengthen data-sharing efforts and continued protection of information.
- 4. Prioritize the revitalization and integration of Native languages in the community, by:**
 - a. Adopting a collective effort to accurately and communally develop curricula and instruction standards via the TED/TEA.
 - b. Supporting how tribal communities make concerted efforts related to immersing skills and behaviors ensuring language revitalization⁶.
 - c. Developing the dissemination and access of native languages using technology to improve the retention and resiliency of language learning.
- 5. Define a rigorous College and Career Readiness standard, by:**
 - a. Increasing Academic Achievement through the usage of online and free readiness resources that engage a student’s future thinking mindset.
 - b. Helping the TED/TEA lead and design a culture of instilling a “being prepared for the future” mentality for all tribal citizens⁷.
 - c. Designing rigorous college-career curricula expanding student’s critical thinking and research skills to solve local-community issues.

³ **Goal 2: Strategy 2.2** “Behavioral Health and Individual Wellness” per BIE Strategic Direction as of 09/02/2017

⁴ **Goal 5: Strategy 5.2** “Support Tribal Education Capacity” per BIE Strategic Direction as of 09/02/2017

⁵ **Goal 6: Strategies 6.1 and 6.2** “Systems of Support and Data-Driven Decision Making” per BIE Strategic Direction as of 09/02/2017

⁶ **Goal 3: Strategy 3.7** “Native Languages and Cultures” per BIE Strategic Direction as of 09/02/2017

⁷ **Goal 4: Strategies 4.2 and 4.3** “Career Readiness and Engagement” per BIE Strategic Direction as of 09/02/2017

TEDNA is a national membership non-profit organization whose mission is to represent Tribal Education Departments/Agencies as they exercise education sovereignty within their respective tribal jurisdictions. All comments enclosed are intended to increase collaboration with TED/TEAs; however the absolutely priority is to maintain a distinct channel of communication and consultation with all tribal elected officials and foster a continued collaborative framework.

TEDNA remains cognizant of the amount of time and work that goes into crafting an agency strategic plan; we are ultimately encouraged by the opportunity to provide feedback and understand not all recommendations are immediately feasible; however incorporating any one recommendation is a step in the right direction. We fervently believe that increasing coordination with tribal nations is beneficial to the academic achievement of all students; especially our Native American students.

Respectfully,



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