



The Bureau of Indian Education | Tribal Consultation Report 2015 Proposed Reorganization

EXECUTIVE SUMMARY

In 2013, Secretary of the Interior Sally Jewell and Secretary of Education Arne Duncan convened an American Indian Education Study Group (Study Group) to diagnose the systemic challenges facing the BIE and to propose a comprehensive plan for reform to ensure all students attending BIE-funded schools receive a world-class education. After conducting numerous listening sessions and four tribal consultations during the 2013-14 school year, the Study Group issued the BIE Blueprint for Reform (Blueprint) on June 13, 2014, a framework for transforming the BIE into an innovative organization that serves as a capacity-builder and service-provider to tribal nations with BIE-funded schools.

In its efforts to implement the Blueprint's recommendation to streamline the BIE's organization to improve services to schools and tribes, the BIE developed a proposal to re-organize the BIE's administrative structure to achieve the following:

- ❖ Align expertise and services to better serve the unique and differing needs of Tribally Controlled and BIE-operated schools;
- ❖ Improve service delivery to schools and tribes by shifting the focus to the field;
- ❖ Create, staff and relocate Education Resource Centers (ERCs) closer to a larger number of BIE-funded schools;
- ❖ Bring U.S. Department of Education (ED) expertise closer to the schools by moving Division of Performance and Accountability (DPA) staff from a central office located in Albuquerque to the ERCs; and
- ❖ Improve accountability and operational efficiency within BIE by clarifying roles and responsibilities for academic programs and school operations.

The BIE then conducted numerous consultations with individual tribes and six national tribal consultations throughout the U.S. regarding this proposed reorganization. A total of 270 participants, including tribal leaders, school board members, school administrators, teachers, parents, state representatives, public school administrators, Congressional staff, and tribal community members, attended the six national consultations.

At each of these consultations, the BIE provided a presentation regarding its proposal and asked tribal leaders and other participants to provide feedback on the proposal.¹

The consultations also provided an opportunity to express views on Indian education issues outside of the scope of the reorganization. Of the comments provided during the formal consultations, 72.5 percent were not directly related to the reorganization proposal. Many comments reflected the same concerns regarding the condition of Indian education which led to the formation of the Study Group, the Blueprint, and Secretarial Order 3334. The majority of the comments from tribal leaders were related to issues outside of the scope of the reorganization, but are important to the improvement of American Indian education generally including, the use of Johnson O'Malley (JOM) program funds, internal tribal concerns regarding local versus tribal control, reauthorization of the Elementary and Secondary Education Act (ESEA), funding for operations and maintenance, and Native youth attending public (non-BIE) schools.

Of the comments BIE received from tribal leaders related to the proposed reorganization, comments generally fell into one of the following four categories:

1. Cost of the Reorganization: Several tribal leaders inquired regarding the cost of the proposed reorganization and expressed concern that funding would be drawn from school budgets to pay for the reorganization.
2. Size of the Bureaucracy: Several tribal leaders inquired whether the proposed reorganization would increase the number of full-time employees (FTEs) in the ERCs, BIE Albuquerque, and DC offices.
3. Timeline for Reorganization: Several tribal leaders asked about when the BIE would begin implementation of the proposed reorganization and when it would be completed.
4. Locations of ERCs: A few tribal leaders asked BIE to justify its proposal to close or relocate several ERCs and expressed concern they would lose services from the BIE.

The BIE listened closely to the concerns raised by tribal leaders and others, considered and responded to each recommendation, and adjusted its proposal to accommodate concerns where feasible and appropriate. The following is a summary of the BIE's responses:

- ❖ Cost of the Reorganization: When designing the proposal, the BIE ensured that the reorganization would have no impact on school budgets which are primarily funded by Department of the Interior (DOI) ISEP and DOE programs. Rather, the reorganization would be paid for using existing funding currently used for administrative purposes (i.e., Education Program Management, Education Program Enhancements, and Division of Performance and Accountability funding from the ED).

¹The BIE's Tribal Consultation Booklet, posted on its website in April 2015, stated: The topics for each 2015 Bureau of Indian Education (BIE) Reorganization Tribal Consultation are: 1. The proposed reorganization is based on Secretarial Order 3334, which calls for the restructuring of the BIE into an innovative organization that will improve operations for both tribally controlled and BIE operated schools. The proposed changes have two primary objectives: 1) strengthen BIE's capability to address school operating needs; and 2) provide greater oversight and improved service delivery to BIE operated and tribally controlled schools. 2. Open Items

- ❖ Size of the Bureaucracy: The proposed reorganization would be accomplished by filling existing vacancies within the BIE. For example, in 2008, the BIE's administrative structure included 208 FTEs. Currently, the BIE's administrative structure has 158 FTEs (95 funded by Education Program Management, 39 paid for using funding from ED, and 24 funded by Education Enhancements). By filling vacancies, reducing non-personnel costs, shifting contracted functions to federal staff, and including school enhancement specialists as part of the BIE administrative structure, the BIE estimates the proposed reorganization will support 196 FTEs.
- ❖ Timeline for Reorganization: BIE assured tribal leaders during the consultations that implementation of the proposed reorganization would not begin until the reprogramming action was completed and the appropriate consultation with Congress had occurred. In the interim, the BIE is taking action to improve its internal operations and identify and hire qualified staff for positions not directly impacted by the reorganization.
- ❖ Locations of ERCs: In response to concerns from tribal leaders and other stakeholders expressed during the consultation session and the written comment period, the BIE has amended its original draft proposal to: (1) establish an ERC in Kyle, South Dakota; (2) transform the existing Education Line Office in Oklahoma City, Oklahoma into the BIE's national Johnson O'Malley Center; (3) create an Education Program Administrator at Pine Ridge to oversee Cheyenne Eagle Butte, Flandreau and Pine Ridge schools; and (4) address several tribal recommendations to realign schools to ERCs.

OVERVIEW OF THE CONSULTATION PROCESS

The BIE conducted six national tribal consultations throughout the U.S. At each of these consultations, BIE gathered the input of tribal leadership and many other interested parties on the organizational design proposed by the BIE as a part of the DOI's implementation of the Blueprint. At each of these consultations, the BIE specifically requested that tribal leaders and other participants comment on the BIE's proposed reorganization changes. From the tribal consultation booklet, the following items were consulted on:

The proposed reorganization based on the Secretarial Order 3334 which calls for the restructuring of the Bureau of Indian Education into an innovative organization that will improve operations for both tribally-controlled and BIE-operated schools. The proposed changes have two primary objectives: 1) strengthen BIE's capability to address school operating needs; and 2) provide greater oversight and improved service delivery to BIE operated and tribally controlled schools.

During the course of the consultation, the BIE presented on the organizational changes and highlighted the following areas:

1. Align expertise and services to better serve the unique and differing needs of Tribally Controlled and BIE-operated schools;
2. Improve service delivery to schools and tribes by shifting the focus to the field;
3. Create, staff and relocate ERCs closer to a larger number of BIE-funded schools;

4. Bring DOE expertise closer to the schools by moving DPA staff from a central office located in Albuquerque to the ERCs; and
5. Improve accountability and operational efficiency within BIE by clarifying roles and responsibilities for academic programs and school operations.

A Federal Register (FR) notice was sent to announce the tribal consultations throughout the country. The tribal consultations began with an opening prayer, a PowerPoint presentation (*see* Attachment 1) explaining the reorganization followed with an open discussion. The initial FR notice announced four national consultations which was expanded to six in response to requests for additional consultations from tribal leaders.

This report provides a summary of the comments and responses provided at the formal consultation sessions. The full transcripts from these sessions are available at www.bie.edu under “Tribal Consultations.” As appropriate, the summary includes additional factual information to update comments made at the consultation session. The report also includes additional written comments submitted after the consultation session.

National Tribal Consultations

The tribal consultations occurred at the following dates and locations and had a total of 270 attendees including tribal leaders, school boards, school administrators, teachers, parents, state representatives, public school administrators, Congressional staff, and tribal community members.

- ❖ April 22, 2015: Ramkota Inn, Rapid City, SD (44 attendees)
- ❖ April 24, 2015: United South & Eastern Tribes Headquarters, Nashville, TN (seven attendees)
- ❖ April 27, 2015: Navajo Department of Transportation, Mentmore, NM (105 attendees)
- ❖ April 29, 2015: Webinar (28 attendees)
- ❖ May 01, 2015: Renaissance Conference Center, Oklahoma City, OK (41 attendees)
- ❖ May 15, 2015: Pueblo of Isleta Casino, Albuquerque, NM (45 attendees)

Regional and Individual Tribal Consultations

Prior to release of the draft reorganization for the formal consultation sessions, twelve regional or individual consultations were held in advance to gather input for the reorganization proposal. These regional and individual sessions provided the BIE an opportunity to meet individually with tribes to gain a deeper sense of their priorities and gather their input on the proposed organizational redesign of the BIE. The BIE presented the organizational charts and answered specific questions with tribal leadership, tribal education departments, tribal staff, and representatives from the schools. A list of these regional and individual consultations is provided below:

- ❖ February 11, 2015: Southern Pueblos
- ❖ February 18, 2015: Oglala Sioux Tribe
- ❖ February 19, 2015: Cheyenne River Sioux Tribe
- ❖ March 2, 2015: Sisseton Wahpeton Oyate

- ❖ March 3, 2015: Crow Creek Sioux and Lower Brule Sioux
- ❖ March 4, 2015: Yankton Sioux
- ❖ March 16, 2015: Standing Rock Sioux Tribe
- ❖ March 17, 2015: Turtle Mountain Band of Chippewa Indians
- ❖ March 23, 2015: Oklahoma City, Oklahoma
- ❖ March 26, 2015: Rosebud Sioux Tribe
- ❖ March 26, 2015: United South and Eastern Tribes (Nashville, Tennessee)
- ❖ April 13, 2015: Met with two Pueblo governors and the Eight Northern Pueblos Executive Director

Written Comment Period

BIE also accepted written comments on the proposed reorganization over a one month period, extending the deadline for comments from May 15, 2015 to Friday, May 22, 2015 at 5:00 pm. The BIE received a total of 19 submission that included comments or resolutions. The comments were organized by region and integrated into the body of this document.

Tribal Consultation Report

This report summarizes the comments BIE received during the national tribal consultations and through the written comment process. Comments (and responses from BIE to those comments) are presented first from tribal leaders, followed by schools, and stakeholders. While the BIE made its best effort to summarize every comment it received from every tribal leader, it may have grouped some comments together with an opening statement such as “several tribal leaders suggested that” or the commenters may be referred to by name.

This report also summarizes BIE’s responses to comments raised by tribal leaders. The BIE made its best effort to respond during the consultation meetings to the substantial points raised by tribal leaders and other participants, especially those directly related to the proposed reorganization. These comments made during the consultation are summarized in the report identified as “BIE Responses.” As appropriate, additional factual or updated information is included and identified as “BIE Post-Consultation Information.”

TRIBAL CONSULTATION 1: Rapid City, South Dakota
April 22, 2015

A total of 44 participants attended this consultation, with several tribal leaders and council representatives including Cheyenne River Sioux Tribe President Harold Frazier (President Frazier), Standing Rock Sioux Tribe Council Delegate Jesse Taken Alive (Delegate Taken Alive), Oglala Sioux Tribe Councilman Collins “CJ” Clifford (Councilman Clifford), and Rosebud Sioux Tribe Councilman Tuffy Lunderman (Councilman Lunderman). Unless otherwise noted, page numbers footnoted refer to the relevant pages in the consultation transcript available at: <http://www.bic.edu/consultation/index.htm>.

- ❖ Presentation of Reorganization: BIE began the tribal consultation with an overview of the reorganization. The presentation covered an overview of the Blueprint, Secretarial Order 3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.²
 - Note: A presentation on the Associate Deputy Director (ADD) for Navajo Schools was cut short because a tribal leader stated it had no relevance to them.³

Comments from Tribal Leaders

- ❖ Cost of Reorganization: Two tribal leaders, including Delegate Taken Alive, inquired about the total cost of the reorganization. They expressed concern that BIE would draw funds to support the reorganization from school budgets and this would impact the hiring of school staff. Delegate Taken Alive requested a breakdown of the funding that would be used for the proposed reorganization and a narrative that described where it would be used with a 14 day deadline.
 - BIE Response: The proposed reorganization would not affect the amount of program funding BIE-funded grant schools currently receive. Specifically, this reorganization would not draw resources from the Indian School Equalization Program (ISEP) funds. In addition, tribes can verify funding levels for ISEP and for BIE administrative FTEs in the Indian Affairs Greenbook (President’s Budget) which is publicly available.⁴
 - BIE Response: The funding source for all administrative and management positions is funded by Education Management, Education Program Enhancements, and ED. These sources and amounts are available in the FY 2015 and FY 2016 Greenbooks.⁵

² *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 2-15, 119-123, 186-193, 241-245, 267.

³ *Ibid.*, 267.

⁴ *Ibid.*, 17-18, 33-35, 53-55, 64-65, 71-73, 224-225, 236.

⁵ *Budget Justifications and Performance Information, Fiscal Year 2015 – Indian Affairs (Greenbook)*, The United States Department of the Interior, IA-BIE-1 to IA-BIE-35.

https://www.doi.gov/sites/doi.gov/files/migrated/budget/appropriations/2015/upload/FY2015_IA_Greenbook.pdf; *Budget Justifications and Performance Information, Fiscal Year 2016 – Indian Affairs (Greenbook)*, The United States Department of the Interior, IA-BIE-1 to IA-BIE-27.

https://www.doi.gov/sites/doi.gov/files/migrated/budget/appropriations/2016/upload/FY2016_IA_Greenbook.pdf.

- BIE Response: Budget development for the BIE is coordinated with the Tribal Interior Budget Committee (TIBC) which identifies budget priorities for tribes. The tribes in one region will identify one representative, which is currently Chairman Harold Frazier. The representative is responsible for bringing the region's tribal priorities to TIBC where it is further prioritized.⁶
- ❖ Validity of Tribal Consultation: Councilman CJ Clifford voiced his concern that the current consultation was not an official tribal consultation because the FR notice announcing the consultations was not published within the 30 day deadline per the Code of Federal Regulations (CFR). He also stated that since Secretary Sally Jewell or Assistant Secretary Kevin Washburn were not present, this should be considered a listening session, and not an official consultation.
 - BIE Response: The language from DOI's Tribal Consultation Policy was provided. The language clarified that notifications could be provided within 30 days, but was not codified under the CFR. BIE clarified that the 30 day was a guide for recommended notifications.⁷
- ❖ Listening Session Attendees: Cheyenne River Sioux Tribal President Harold Frazier asked about the 400 stakeholders that attended the Blueprint listening sessions in late 2013.
 - BIE Response: The attendees are listed in an appendix to the Blueprint.⁸
- ❖ Settlement Agreement: Councilman CJ Clifford stated that BIE should comply with the terms of the settlement agreement (Settlement) requiring tribal consultation regarding the number of offices and staffing in the Dakotas and to this day that settlement has not been honored. Concerns were voiced that many of these sites have been closed. Tribes are asking the Education Line Offices (ELOs) remain open with staffing for schools in the Dakotas.⁹
 - BIE Response: BIE is following the policy for tribal consultation described in the Settlement and that a reorganization is permissible under the terms of the Settlement.
 - BIE Post-Consultation Information: The Executive Summary identifies changes to the original proposal to address concerns in the Dakotas.
- ❖ Lack of Adequate Operations and Maintenance (O&M Funding) and Construction: Councilman CJ Clifford stated that Congress has not fully funded O&M. O&M is funded at 50 percent of need. In order to compensate for this shortfall, schools must take from their ISEP and ESEA funds to fix the schools.¹⁰
- ❖ Guarantee of Success: President Harold Frazier voiced a need to conduct a study on whether the new design would work to guarantee a success of these changes.¹¹
- ❖ Inclusion of Public Schools into Indian Reform: President Harold Frazier voiced the need to include public schools in discussions surrounding Indian education reform because the majority of Native

⁶ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 225-226.

⁷ *Ibid.*, 26-32.

⁸ *Ibid.*, 36-37; Bureau of Indian Education, "Proposed BIE Reorganization and Blueprint for Reform Implementation," <http://www.bie.edu/BFRI/index.htm>, accessed 8 September 2015.

⁹ *Ibid.*, 38.

¹⁰ *Ibid.*, 50-52.

¹¹ *Ibid.*, 56-57.

students attend public schools and not BIE-funded schools. Also, many students move frequently from off-reservation public schools to BIE-funded schools.¹²

- ❖ Johnson O'Malley Funding and Counts: Delegate Jesse Taken Alive stated that Congress should know that BIE was still using JOM counts from the 1990s.¹³
 - BIE Response: BIE recently completed tribal consultations on JOM and a new count is being developed.¹⁴
- ❖ BIE is Building a Bigger Bureaucracy: Councilman CJ Clifford described in the last reorganization under a prior BIE Director, the interest was to eliminate support services on Indian reservations, and in particular at ELOs and move these services to consolidated offices in state capitals and urban areas such as Rapid City, South Dakota, and other places, and to centralize, urbanize and effectively reduce services to tribal children... the director sought to have more bureaucracy and fewer services. Back then, Councilman Clifford alleged the reorganization would have required an \$11 million increase in the BIE's budget.¹⁵ He also alleged in the past ten years, the administrative costs of the BIE have increased 200 percent, while tribal schools have suffered decreases each year in the amount of money they receive for maintenance and facilities, and in education scores.¹⁶
 - BIE Post-Consultation Information: In 2009, funding levels for BIE for administration staffing was \$19 million. In 2015, funding levels have declined to \$14 million – about a \$5 million cut.
- ❖ Local Control: Councilman Tuffy Lunderman alleged that BIE is turning Indian tribes against their own tribal schools by eliminating local control and tribal school boards through the Sovereignty in Indian Education enhancements.¹⁷
 - BIE Response: The Sovereignty in Indian Education enhancements cannot eliminate local control or tribally controlled schools; rather, they build the capacity of tribal education departments. Whether a tribal nation chooses to assume control over BIE-funded schools located on its reservation is up to the tribal nation and its members to decide, and not for the federal government to decide.¹⁸
- ❖ Conduct Additional Studies: Councilman Clifford requested that the effort to restructure tribal education be put on hold until BIE has a lengthy and meaningful study period, with tribal education experts and with the affected tribes and tribal school boards, that incorporates data and research, and additional consultations have been conducted. He also requested that BIE conduct a study regarding whether it is properly implementing the Indian Self-Determination and Education Assistance Act.¹⁹
 - BIE Response: There have been extensive studies completed on the agency. Most recently, the Bronner Report and now, the Study Group. The study group gathered input from 400

¹² *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 58-59.

¹³ *Ibid.*, 66-67, 225, 229.

¹⁴ *Ibid.*, 227-229.

¹⁵ *Ibid.*, 75.

¹⁶ *Ibid.*, 74-80.

¹⁷ *Ibid.*, 81.

¹⁸ *Ibid.*, 115.

¹⁹ *Ibid.*, 82-84.

stakeholders through six listening sessions starting in October 2013, then a series of tribal consultations in 2014 on the Recommendations by the Study Group, then individual meetings with tribes from February to April 2015, then this final series of tribal consultations on the reorganization of the BIE. The BIE has made considerable effort, going far and beyond, to gather meaningful dialogue from tribes, particularly in the Dakotas.²⁰

- BIE Response: The research that supports the design and establishment of the ERCs are based on states such as Minnesota and Arizona, which are deploying the same restructuring as a way to bring rural schools together to collaborate.²¹
- ❖ Underfunding of Schools: Councilman Clifford requested that DOI investigate the underpayment of Congressionally-appropriated monies for tribal grant and contract schools, and operations and maintenance.²²
 - BIE Post-Consultation Information: The Study Group prioritized a budget that is aligned to support new priorities. In the new fiscal request, BIE has requested a push to increase funding for ISEP, facilities O&M, school construction, and tribal grant support costs. We have seen an increase in our funding request.
- ❖ Access to Federal Employee Health Benefits Program: Councilman Clifford requested that employees that work at BIE-funded 297 grant schools be eligible to participate in the Federal Employee Health Benefits Program (FEHBP).²³
 - BIE Post-Consultation Information: In response to tribal grants schools' requests to receive Federal Employee Health Benefits (FEHB), the Solicitor's Office has issued a legal opinion that employees who work for 297 grant schools are not eligible for FEHB program benefits unless they are common law employees of a tribe that has a 638 contract and currently participates in FEHB. DOI and Office of Personnel and Management (OPM) are investigating the matter in order to address the concerns of tribal grant schools regarding employee health benefits.
- ❖ Oppose Transfer of BIE-Funded Schools to ED: Councilman Lunderman expressed concern that the Administration intends to transfer the BIE and the education of Lakota students to the ED and that he opposes such a change.²⁴
- ❖ Tribal Control: Councilman Lunderman stated that effective reform must be directed at transitioning operation of tribal grant schools to true tribal control of BIE-funded grant schools. He stated tribal governments are struggling to establish their own tribal education departments (TEDs) into effective regulatory agencies because the tribes lack financial resources. Adequate annual appropriations must be used to assist tribes to become state educational agencies (SEAs) and federal appropriations of educational dollars must flow directly to tribes and schools.²⁵

²⁰ Ibid., 112.

²¹ Ibid., 112.

²² Ibid., 82-84.

²³ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 82-84; Bureau of Indian Education, "Proposed BIE Reorganization and Blueprint for Reform Implementation," <http://www.bie.edu/BFRI/index.htm>, accessed 8 September 2015.

²⁴ Ibid., 86.

²⁵ Ibid., 86-88, 91.

- BIE Post-Consultation Information: BIE Sovereignty in Indian Education grants and the Tribal Education Department grants provide funding to build the capacity of TEDs.²⁶ On August 5, the BIE awarded the Rosebud Sioux Tribe, Standing Rock Sioux Tribe, and Oglala Sioux Tribe with TED funding to build the capacity of their educational departments for three years.
- ❖ GAO Report: Councilman Lunderman stated that a recent Government Accountability Office (GAO) report has identified serious management failures within the BIE due to a lack of effective BIE accountability controls. He stated that BIE's failures should not reflect negatively upon tribes and grant schools and should not justify the continued practice of ineffective paternalistic policies.²⁷
- ❖ Assimilation Policy Continues: While Councilman Lunderman pointed out the the Blueprint states assimilation is no longer a federal policy, it continues to be a practice carried out for the past 130 years or more. Education and assimilation are not synonymous and until true tribal control of education is recognized and reform efforts make tribal sovereignty a priority, no reform plan will effectively educate Lakota children.²⁸
- ❖ Reorganization Favors Navajo Nation: Councilman Lunderman stated the proposed reorganization favors the Navajo. According to the proposal, the ADD for Tribally Controlled schools will oversee 93 schools and is projected to work with 53 tribes. The ADD for Bureau Operated schools will oversee 27 schools and is projected to work with 17 tribes. The ADD for Navajo Schools will oversee 64 schools and will work only with the Navajo.²⁹
 - BIE Post- Consultation Information: To address concerns expressed about the proposed reorganization “favoring” a particular group, the information below shows the workload balance across the ADD in terms of schools served and staffing/school ratios.
 - Under the proposal, the ratio of ERCs to BIE-funded schools in each region is as follows:
 - ADD Bureau Operated: one ERC to seven schools;
 - ADD Tribally Controlled: one ERC to 13 schools; and
 - ADD Navajo: one ERC to 13 schools.
 - In addition, the ratio of ERC staff to BIE-funded schools is as follows:
 - ADD Bureau Operated: one FTE to one school;
 - ADD Tribally Controlled: one FTE to one school; and
 - ADD Navajo: one FTE to three schools.
- ❖ Create a Great Sioux ADD: Councilman Lunderman stated that the Rosebud Sioux Tribe requests the Great Sioux Nation be treated equally, and be given the opportunity to develop and propose a plan to have its own ADD.³⁰
 - BIE Post-Consultation Information: The BIE welcomes such a plan; however, to date, it has not received a plan from the Great Sioux Nations to establish their own ADD.

²⁶ Ibid., 110-111, 114.

²⁷ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 80, 88.

²⁸ Ibid., 88.

²⁹ Ibid., 92.

³⁰ Ibid., 93.

- ❖ More Funding for TCUs: Councilman Lunderman requests more funding for tribal colleges and universities so they can accomplish their role in training teachers for the future development of tribal nations. He also requested more funding for student scholarships.³¹
- ❖ School Improvement Services and Funding: Delegate Jesse Taken Alive provided a list of current school improvement technical assistance provided to the schools.³² Other tribal leaders inquired about how School Improvement Grant (SIG) funds are distributed and about the impact SIG funds have on school performance.³³
 - BIE Response: BIE will: (1) announce ED’s next competition for ED’s SIG funds;³⁴ and (2) provide data regarding improved academic performance in BIE-funded schools receiving SIG funding. The data will be made available on the BIE website.³⁵
- ❖ Revision of Accountability in ESEA: Delegate Taken Alive stated that Native children were “turned over to the state” once the BIE was asked to devise a testing process.³⁶
 - BIE Response: BIE stated it would initiate the negotiated rulemaking to address BIE’s accountability systems and that it was working with ED to accept the Miccosukee Tribe’s proposal to develop an alternative definition of adequate yearly progress under the ESEA.³⁷
- ❖ Curriculum Requirements for Schools: Councilman Tuffy Lunderman inquired about the BIE’s role in requesting that grant schools adopt a certain curriculum.³⁸
 - BIE Response: BIE does not require grant schools to adopt a certain curriculum this is left up to the schools.³⁹
- ❖ Tribes Creating Own Accountability Systems: Councilman Tuffy Lunderman inquired if states will recognize tribal accountability systems once they have them established.⁴⁰
 - BIE Response: The states currently have to comply with the rules established by Congress.⁴¹
- ❖ Common Core State Standards: Delegate Jesse Taken Alive inquired about the status of CCSS.
 - BIE Response: Schools still have to use what the states are using. If a state is going with Common Core, then the schools that fall within the boundary of the state must comply.⁴²
- ❖ Defining Tribal Sovereignty: Standing Rock Sioux Tribal Council Delegate Jesse Taken Alive described tribal sovereignty as differing from federal sovereignty and Lakota sovereignty.⁴³

³¹ Ibid., 94.

³² Ibid., 125.

³³ Ibid., 141, 144, 230-231.

³⁴ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 128-134.

³⁵ Ibid., 141.

³⁶ Ibid., 135.

³⁷ Ibid., 135-136.

³⁸ Ibid., 136.

³⁹ Ibid., 136-138.

⁴⁰ Ibid., 138-140.

⁴¹ Ibid., 140.

⁴² Ibid., 143.

⁴³ Ibid., 178.

- BIE Response: Sovereignty is based on the interpretation of 64 differing tribes. It's not a one size fits all.⁴⁴
- ❖ Generational Trauma: Rosebud Sioux Tribal Councilman Tuffy Lunderman described that education contributes to generational trauma but education is important.⁴⁵
- ❖ Referenced to OSEC on Reorganization Letter: Standing Rock Sioux Tribal Council Delegate Jesse Taken Alive pointed out a letter was sent two years ago regarding the reorganization. The tribal leader asked for an extension on the comment period to have OSEC organize and submit their comments.⁴⁶
 - BIE Post-Consultation Information: The comment period was extended to May 22, 2015 due to additional tribal consultations being requested. At that time, there was no formal written consultation submitted to the BIE.

Comments from School Administrators, School Board Members, and Other Stakeholders

- ❖ Schools will Establish Accountability Workbook: A school administrator inquired about the possibility of establishing an alternative definition of AYP that incorporates use of a student growth model.⁴⁷
 - BIE Response: DPA will provide all the necessary support along with ED to assist the schools in establishing the accountability workbook.⁴⁸
- ❖ Treaties Obligations Should Supersede Acts or Amendments: School staff, on behalf of a school administrator, read a letter stating that the federal government should commit themselves to adhering to the rule of law established by treaties.⁴⁹
- ❖ Need to Use Funding More Wisely: An administrator explained there is a need for more funding for schools. He was excited by the increase in funding for transportation and now they will purchase five more buses.⁵⁰
 - BIE Response: The administrator should reach out to the Director's Office, ADD, or School Operations to help them figure out their funding concerns. BIE did reach out to this school administrator to assist on multiple efforts.⁵¹
- ❖ Support for Suicide Prevention: School board members voiced their concerns related to 200 suicide attempts since December 2014.⁵²

⁴⁴ Ibid., 179.

⁴⁵ Ibid., 260.

⁴⁶ Ibid., 236.

⁴⁷ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 153-154.

⁴⁸ Ibid., 155-156.

⁴⁹ Ibid., 184-185.

⁵⁰ Ibid., 208-214.

⁵¹ Ibid., 212-213.

⁵² Ibid., 214, 220-221.

- BIE Response: BIE is working to establish a staff to work on building partnerships with IHS, SAMHSA, tribes and social services to address the systemic needs to help the suicide issues.⁵³
- ❖ Off Reservation Public Schools: A school board member voiced the need to retain funding for students on the reservation because presently many Native students who live on the reservation are leaving to attend schools off the reservation.⁵⁴
- ❖ Sovereignty Office: A school board member spoke about using the proposed Sovereignty Office to create a forum to improve dialogue between tribes, principals, and schools.⁵⁵
- ❖ Barriers for Tribal Control: Although a consultant alleged that ESEA was a major barrier to tribal control; however, a tribe could have certain ESEA requirements waived, like the waiver the Miccosukee received.⁵⁶
 - BIE Response: BIE will provide all the documents on Miccosukee’s proposal which is identified under the 9401 waiver. The waiver required joint approval from both the BIE and the ED.⁵⁷
 - BIE Response: Tribes have the right to develop curriculum standards and assessments. Tribes can do this now without the accountability workbook.⁵⁸
- ❖ Fully Fund Schools: State board member described that BIE should fund all schools 100 percent for all areas of funding. It’s clear from the reference to SIGs that more funding equals success.⁵⁹
 - BIE Response: The six BIE-funded schools that have received SIG funding have not all been successful. Based on the data, only one school showed significant improvement. DPA will provide SIG-related data for tribes.⁶⁰
 - BIE Response: The new organization must address the shortages in staffing in order to be successful.⁶¹
 - BIE Response: Tribal leaders must support increased funding for BIE schools during Tribal Interior Budget Council (TIBC) meetings. In the past, tribal leaders have prioritized other issues but not BIE-related programs.⁶²
- ❖ Tribes Consultation Reflect Tribal Funding Priorities: State board member described that at the consultations, multiple tribal leaders are establishing their priorities and this should reflect the tribal priorities for the budget.⁶³

⁵³ Ibid., 222-223.

⁵⁴ Ibid., 214-215.

⁵⁵ Ibid., 217-218.

⁵⁶ *Bureau of Indian Education Reorganization – National Tribal Consultation in Rapid City, South Dakota*, Rapid City: Bureau of Indian Education, 22 April 2015, 161-183.

⁵⁷ Ibid., 177-178.

⁵⁸ Ibid., 180.

⁵⁹ Ibid., 193-198, 199-200.

⁶⁰ Ibid., 198-199.

⁶¹ Ibid., 200.

⁶² Ibid., 205.

⁶³ Ibid., 205.

Written Comments Received from the Great Plains Region

- ❖ Treaty Obligations: Letter from Sicangu Owayawa Oti of Mission, South Dakota from Sicangu Owayawa Oti Board of Directors dated April 22, 2015: The Board sought to remind the DOI that tribal entities are entitled to educational opportunities for Native children, per the tribe's treaty rights. The treaties relevant to the Lakota Tribes are the 1851 Treaty and the 1868 Treaty. The Treaty obligations and public laws should supersede any acts or amendments that the DOI wishes to place on tribal schools. Tribes should have absolute authority over any and all policy in reference to education of our people. The Board recommended that line offices, which are mostly located on reservations, remain open and be fully staffed. The Board also expressed continued support for Sicangu Owayawa Oti Resolution No. 04-03, which opposed the closing of a line office in 2004.
- ❖ Concerns Regarding BIE Reorganization: Email from Lisa Bielawski, M.Ed., Sitting Bull School Superintendent: Ms. Bielawski raised the following concerns in her message dated May 5, 2015: (1) Since *Yankton Sioux Tribe et al. v. Kempthorne* BIE has ignored its' consultant's recommendations to increase funding at the local level and continues to try to remove the BIE ELO from Standing Rock and to funnel the SEA funding it receives from the ED and not to the reservation; (2) Tribes in the region have requested that SEA funds be available to TEDs instead of the BIE so TEDs can develop their own accreditation and teacher certification standards, and can provide technical assistance and funds to tribal schools; (3) The individuals implementing the ESITE grant must look at the impact it will have on the children.
- ❖ Objective of Achieving a World Class Education: Email from Teresa Wall-McDonald transmitting comments from the Confederated Salish and Kootenai Tribes (CSKT) in Montana dated May 11, 2015: The CSKT expressed that the proposed reorganization does not meet the objective of achieving a world class education for the Indian students who attend a tribal or BIE controlled school. The CSKT specifically feels that the creation of the ADD regions, the ERCs and the newly created positions within the BIE will only serve to further disenfranchise Indian students. The CSKT is most interested in two reform areas: (1) Promote Self-Determination for Tribal Nations and (2) Budget Aligned to Support New Priorities. CSKT feels the funding inequities do not produce a world class education and will stay involved as the process evolves.
- ❖ Budgetary and Consultation Concerns: An email dated May 15, 2015, from Ms. Tracey Zephier, Esq., Fredericks, Peeples & Morgan, LLP of Rapid City, SD, transmitting a letter on behalf of the Cheyenne River Sioux Tribe, indicated that the Tribe has requested budgetary data from the BIE in order to offer meaningful consultation on BIE restructuring. This budgetary data request included funding sources and current and proposed budgets for the different BIE offices as well as details on how funds will be reallocated in the restructuring. The Tribe expresses its disagreement with BIE's restructuring efforts having already begun prior to consultation with tribes and its concerns that restructuring will not, in fact, be "budget neutral" as described by Mr. Charles Roessel, BIE Director. It also notes that there has been no study to show the proposed restructuring will succeed. Finally, if restructuring of the BIE has already begun, the Cheyenne River Sioux demands that it stop immediately. The Tribe also demands that the BIE provide it with the information requested above within 15 calendar days, or the Tribe will initiate legal proceedings to stop the restructuring. Note: The BIE submitted a response to Ms. Tracey Zephier, Esq., Fredericks, Peeples & Morgan, LLP of Rapid City, SD on July 16, 2015.

TRIBAL CONSULTATION 2: Nashville, Tennessee April 24, 2015

The meeting had seven attendees with three representatives from the United South and Eastern Tribes (USET). Unless otherwise noted, page numbers footnoted refer to the relevant pages in the consultation transcript available at: <http://www.bie.edu/consultation/index.htm>.

- ❖ Presentation of Reorganization: BIE staff began the tribal consultation with a presentation of an overview of the reorganization, the Blueprint, Secretarial Order #3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.

Comments from Tribal Leaders

- ❖ Nashville Staffing: Kathy Brown, USET Co-chair inquired about the start date for hiring of Special Education staff at the ERC to assist schools with these specific needs. They request that the new staff for Nashville attend the next United South and Eastern Tribes meeting to meet the tribal representatives.
 - BIE Response: Hiring may begin by end of June depending on approval from Congress.⁶⁴
- ❖ Need More Specialized Staffing: Kathy Brown, USET Co-chair remarked on the need for more school improvement specialists. The critique was the current ELO are day to day operators and administrators. “We want more people who are technical assistance focused, and know how to get the resources and support to the schools.”⁶⁵
 - BIE Response: There are funds allotted to support the professional development of the school improvement specialists to build new skills to assist schools.⁶⁶
- ❖ Too Many Vacancies/Staff Recruiting: Kathy Brown, USET Co-chair pointed out the BIE retention and hiring process has a history of empty positions that are needed in the field. The concern was – what was BIE doing to address the deficiency in hiring of staff?⁶⁷
 - BIE Response: The solution would require a change in BIE’s culture in not demanding compliance from schools – but to create more customized services to the schools and tribes.

⁶⁴ *Bureau of Indian Education Reorganization – National Tribal Consultation in Nashville, Tennessee*, Nashville: Bureau of Indian Education, 24 April 2015, 26-27, 33.

⁶⁵ *Ibid.*, 33.

⁶⁶ *Ibid.*, 34.

⁶⁷ *Ibid.*, 36.

The tribes play a role in helping to align these exchanges. The ERCs will provide an opportunity to coordinate and meet the needs of multiple schools by developing collaborative strategies.⁶⁸

- **BIE Response:** BIE is transforming how they recruit and retain staffing across the entire system. The new approach will take recommendations from school leaders to identify staff that have demonstrated the commitment and success. BIE’s new strategy is to recruit them into positions to help us build a better BIE.⁶⁹ The attendee reiterated the earlier concern of filling positions and keeping people in the ED School Improvement and Special Education positions.⁷⁰
 - ❖ **BIE Leadership:** The attendee raised concerns over the limited time (turnover) BIE leadership remains in their positions. The leadership should establish a sense of permanence and not stay only for 18 months but for a lot longer.
 - ❖ **School Collaboration:** BIE stated the design of the ERC is to address the vast number of small schools within the BIE school systems. A school will have one third grade teacher, one fourth, and one fifth—with no opportunity for peer engagement to exchange best practices across grades. The the purpose of the ERC is to have a person engage and coordinate across schools to unify third grade teachers, etc., to establish true collaboration.⁷¹ The attendee agreed there is a need to create established collaboration among schools. Currently, this is the school’s current practice to engage directly with other schools – by picking up the phone and asking what types of programs they develop at their schools.⁷²
 - ❖ **Lack of Communication:** Concern was expressed about the need for communication not just from here down (from central office to the schools) but also among the schools.⁷³
 - ❖ **Reorganization Cost:** Concern was expressed regarding the plus-ups to cover the cost of the reorganization. There is a failure of the current administration to adequately fund schools.⁷⁴
 - **BIE Post-Consultation Information:** The BIE ensured the reorganization would have no impact on school budgets which are primarily funded by DOI ISEP and ED programs. Rather, the reorganization would be paid for using existing funding currently used for administrative purposes (i.e., Education Program Management, Education Program Enhancements, and Division of Performance and Accountability funding from the ED).
- Competition of Awards:** Kitcki A. Carroll, USET, voiced concern that BIE’s intention to use competitive grants and programs was problematic and not the best way to distribute funding to its schools.⁷⁵

⁶⁸ Ibid., 41.

⁶⁹ Ibid., 43-44.

⁷⁰ Ibid., 72.

⁷¹ *Bureau of Indian Education Reorganization – National Tribal Consultation in Nashville, Tennessee*, Nashville: Bureau of Indian Education, 24 April 2015, 68.

⁷² Ibid., 72-73.

⁷³ Ibid., 70.

⁷⁴ Ibid., 89.

⁷⁵ Ibid., 115.

TRIBAL CONSULTATION 3: NAVAJO DEPARTMENT OF TRANSPORTATION

#16 OLD COALMINE ROAD, MENTMORE, NM

The meeting had 105 attendees with tribal leaders from the Santa Clara Tribe Governor J. Michael Chavarria, Navajo Nation Tribal Council Delegate Amber Crotty, Staff Assistant Carlene Tehnakhongva from the Hopi Tribe, Eight Northern Indian Pueblo Council Executive Director Gil Vigil, school board members, school administrators, and community members. Note: This section is organized by speaker and not by the themes of the comments.

- ❖ Presentation of the Reorganization: BIE staff began the tribal consultation with a presentation of an overview of the reorganization, the Blueprint for Reform, Secretarial Order 3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.⁷⁶
- ❖ Santa Clara Tribe: Governor J. Michael Chavarria requested the following:⁷⁷
 - Although the BIE provided the Pueblo with \$50,000 to help the tribe plan the conversion of its school from federal to grant status, this was an insufficient amount of funding to accomplish the tasks at hand.
 - Clear reporting requirements because they are sometimes last minute and unaligned to mandated reporting schedules.
 - Requests BIE work with the State of New Mexico to develop a waiver system for potential school administrators and teachers.
 - Because the Pueblo did not have three or more BIE-funded schools, it was ineligible to apply for Sovereignty in Indian Education enhancement funds.
 - Supports the effort to ensure tribal support costs are funded at 100 percent.
 - Requests financial support to offer a pay scale in its grant school that is competitive with the federal pay scale.
 - In the long terms, asks for new facilities for the Santa Clara Day School, greater understanding of the FMIS process, and greater understanding of how funds are released from the federal government.
 - Identifies the need for more funding, explaining that tribal leaders need to work together to advocate for funding on the Hill, and expresses concern that BIE's plan to encourage more schools to become tribally controlled will ultimately force tribes to fund the schools.
 - BIE Response: The Department of the Interior's budget, which includes funding for tribes, is informed by a process called the Tribal Interior Budget Committee (TIBC) in which tribes express funding priorities; this is tribal leaders' main opportunity to communicate these priorities to Interior.⁷⁸
- ❖ Eight Northern Indian Pueblo Council: Executive Director Gil Vigil pointed out the following:

⁷⁶ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 5-61.

⁷⁷ *Ibid.*, 61-70.

⁷⁸ *Ibid.*, 70.

- In addition to BIE-funded schools located on reservations, we must also consider the needs of Native students that attend public schools located on reservations.
 - Do away with ESEA and its AYP requirements.
 - Adult Education is part of the education process.
 - Language and culture must begin at zero to three years old – we need funding for immersion programs.
 - We need funding for Early Education from the ED.
 - Need funding for professional development and we need to pay higher salaries for teachers.
 - Allow tribes to develop their own curriculum and put waivers on some of the requirements so they can develop their education programs.
 - The tribe needs new school facilities, current school was built 100 years ago.
 - The tribe requests another consultation in Albuquerque, NM.⁷⁹
- BIE Post-Consultation Information: In response to requests to have an additional consultation in New Mexico, the BIE conducted an additional consultation on May 15, 2015 in Albuquerque, New Mexico.
- ❖ Tribal council delegate Amber Crotty, Navajo Nation Tribal Council requests the following:
 - Mandatory funding for the tribes because the tribes are not special interest groups.
 - Increased curriculum for Native language in the classrooms.
 - Pathways for tribally controlled schools.
 - Strengthened accountability systems that do not put too much value into AYP.
 - Increased facilities that are safe and environmentally safe for children.⁸⁰
 - ❖ Dr. Tommy Lewis, Department of Diné Education (DODE) Superintendent, spoke regarding the following concerns:
 - Appreciates the tribal consultations the government utilizes which increases the engagement of tribe – this was never considered in the past.
 - BIE provided funds to support a feasibility study on whether the tribal nation can undertake a single-grant concept and it found that the nation could. From there, the tribe received Sovereignty in Indian Education funding to develop the plans to engage the community to improve on what has been laid out. The tribe is seeking the best path for their children. The school systems on Navajo are fragmented (Head Start is not connected to Elementary, Elementary not connected to Secondary, and Secondary not connected to Post-Secondary).⁸¹
 - ❖ Carlene Tenakhovga, Staff Assistant to Hopi Chairman Herman Honanie, reading a statement from the Chairman.
 - The goal of the tribe is to educate the Hopi Tribal Council and community stakeholders of their responsibilities as the ultimate authority over the tribally-controlled schools.
 - The tribe requests the BIE to be transparent with the implementation of the BIE's reorganization. Questions they pose are:

⁷⁹ Ibid., 72-79.

⁸⁰ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 80-86.

⁸¹ Ibid., 86-93.

- Will the proposed office, ADD for tribally controlled schools in Albuquerque be in operation prior to the closure of the Keams Canyon ELO?
- When will the Keams Canyon ELO be closed?
- What will happen to staff currently employed in the Keams Canyon ELO?
- Tribe requests further in-depth consultation with ongoing outreach training.
- Tribe requests technical service and assistance to Hopi Schools in order to operate high-performing schools
- Tribe asks for the timeline for the awarding of funds under the Tribal Education Department Section 2020 grants.⁸²
 - BIE Post-Consultation Information: The Hopi Tribe was one of seven tribes that received a TED grant under Section 2020.
 - BIE Post- Consultation Information: BIE met with the Hopi Tribal Chairman and Tribal Education Department on August 13, 18, and 28, 2015. The Chairman is currently in the process of filing an intent to 638 the Education Line Office services.

Comments from School Administrators, School Board Members, Community Members

- ❖ Eric Olson, Chief Financial Officer, Santa Fe Indian Schools: The following requests were made:⁸³
 - Requested that BIE provide clearer steps on the conversion process for BIE Operated schools to become Tribally Controlled Schools.
 - BIE must provide more funds to support tribes to conduct a feasibility study.
 - Requested that tribal grant support costs be increased from 84 percent to 100 percent.
- ❖ Marian John, Board of Trustees, Kinteel Residential Dorm: The following requests were made:⁸⁴
 - Concerned that the new “Chief Academic Officer” title should not use the term “Chief” since that term has a special meaning for some tribes.
 - Concerned that BIE is closing Shiprock and Gallup ELOs.
 - Asked if the schools will be asked to pay for technical assistance under the reorganization.
 - Indicated the school had a boiler that was not repaired and they had to seek a contract outside, will they get that kind of lip service again.
 - Schools need housing for their teachers.
 - Stated her school is concerned that Navajo is taking over their schools and doing away with all the school board members because BIE is giving them the authority. This needs to be corrected.
 - Concerned about the condition of the facilities and they ask for Washington to do something for their facilities.
 - Need money to teach parents on how they should support their children because they come from dysfunctional families.

⁸² Ibid., 86-97.

⁸³ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 99-100.

⁸⁴ Ibid., 102-108.

- BIE Response: Related to facilities concerns – these are funds that are provided directly to the school. The FY16 request includes additional funds for maintenance and replacement facilities. In response to parents, there are federal funds that come to the school that have a component for parent involvement. The school should have funds to build that type of relationship with the parents. Teacher housing – There is a \$3.7 million dollar increase in the FY16 budget request for teacher housing, \$60 million total for new school construction, and a \$20 million increase for Facility Operations and Maintenance. There is also a \$10 million requested in the Department of Housing and Urban Development budget to address teacher housing needs near schools in the BIE school system.⁸⁵
- ❖ Cynthia Morris, Human Resources Director, Shonto Preparatory School: The following questions were asked by the representative:⁸⁶
 - Stated the Sovereignty in Indian Education work is not being addressed by the reorganization.
 - Asked why is the BIE continuing to provide services if the intent of the SIE is to have the tribe operate the schools? Is this continued employment for federal employees? What is the plan for the BIE to become its own entity? When will this be proposed to the Assistant Secretary -- Indian Affairs?
 - The reorganization from the slides seem to focus on ADDs that are not Navajo, but leave Navajo ADD out of the reorganization until the work of the SIE is completed.
 - What is the role of the Division of Performance and Accountability? What is the duplication of services? What do the colors mean, there is no legend on the slides?
 - There are 51 FTE charges; each year it will cost \$4.730 million to operate the BIE organization. That is in direct contrast with the SIE intentions.
 - The current BIE is intended to be temporary to meet the current BIE responsibility until tribes take over, so will this funding be available when tribes eventually take over?
 - In the FY 2016 budget, the \$22 million for salary does not include travel, training, vehicles, utilities, et cetera. Which budget line is this coming out of in the proposed FY budget? What is the current cost of all employees currently in the new ADD Navajo BIE office? What indication is there to demonstrate that current employees are effective in any manner?
 - If the BIE is to continue providing support and technical assistance until the tribes take over, will there be a specific process for those employees knowing what to do and from whom will they take direction?
 - Do you know the roles support and technical assistance for school improvement which is different from monitoring and requiring report submission, or is this a huge number of federal employees with little to no direction on what they will do, when they will do it, and without true purpose? Is this information in the BIE strategic plan? Who, in leadership, has the capability to truly get the message across to the federal employees?
 - What is the projected timeline for this expenditure to cease once tribal sovereignty is in place? Will the \$22,000, 182 FTE? be available once the sovereignty in education government is in place?

⁸⁵ Ibid., 109-112.

⁸⁶ Ibid., 118-121.

➤ BIE Response to questions:

- The colors show the different sources of funding and the distribution of school operations, DPA, and EPM funding.
- The reorganization does take into consideration the SIE program. It is a decision of the Navajo Nation, not the BIE, how Navajo wants to move forward. If they want to continue the current way, then we continue the current way.⁸⁷
- The funding to the Navajo Nation comes to Navajo in two ways:
 - The Navajo Nation schools are authorized by the Navajo Nation and receive direct funding from the BIE through ISEP.
 - Programs that BIE funds and operates directly.
- The funding for the FTEs comes from Education Program Management.
- If the Navajo Nation converts the 32 BIE-operated schools located on the Navajo Nation to tribal control, then the federal footprint on the reservation would become much smaller. Those funds that would have supported the BIE would be replaced with tribal support costs that would go directly to the tribe – or to the tribally controlled school.⁸⁸
- BIE is not building a separate bureau.⁸⁹
- During our last reorganization, we had in 2008, BIE had 214 positions. We are still 47 positions below what BIE used to have – because we do not want to build a higher bureaucracy. We have funds come from ED that funds staff in DPA.⁹⁰
- We are trying to address the duplication of services – DPA in the past would say one thing and then the next day a line office would say another. We are trying to clear that situation up. DPA funds will be dispersed into the ERC to eliminate the duplication of requests that schools received in the past.⁹¹
- BIE has one of the most complicated budget systems. We have one person doing the entire budget for a \$1 billion operation with \$200 million from the ED and \$750 million from the DOI – we needed to get some help for BIE to deliver better service.⁹²

❖ Pearl Smith, Business Manager, Shonto Preparatory School: The following questions were asked:⁹³

- How does the Internal Revenue Code 501 (c)(3) work, or is that still going to be in place for schools in regards to them working to get private funding?
 - BIE Response: BIE will support the tribe in what they may decide as being their authorization process. We want to be sure that we are not doing anything that

⁸⁷ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 122.

⁸⁸ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 125.

⁸⁹ *Ibid.*

⁹⁰ *Ibid.*, 127.

⁹¹ *Ibid.*

⁹² *Ibid.*, 130.

⁹³ *Ibid.*, 132-136.

would infringe on the sovereignty of a tribe in the way they execute the Articles of Incorporation through a 501(c)(3).⁹⁴

- The big cost of BIE Facilities maintenance is the asbestos and maybe this is why BIE doesn't want to do anything – maybe help schools to get into private funding.
- Are we utilizing technology as we should to really bring it into the classroom?
- There are positions being eliminated at the school level, the professional staff, even as BIE is adding positions. Will my position eventually be eliminated too?⁹⁵
 - **BIE Response:** We are not proposing to eliminate any positions within the grant schools, BIE does not have that authority.⁹⁶
- ❖ Janet Slowman Chee, School Psychologist, Little Singer School: The following statement was made:⁹⁷
 - In the past, BIE has never told us, “You tell me what to do.”
- ❖ Paulina M. Begay, President, Navajo Nation School Board: The following statements were made by the board member:⁹⁸
 - Schools need to review the type of assessments being used – we have to come out with our own assessments. Sometimes all the data analysis doesn't *give* and I wonder what we are doing for our students.
 - When our schools come make reports to us, what is it that we need to help them with?
 - We have a grant, the Sovereignty in Indian Education and a feasibility study, and the Alternative Accountability Workbook. We wonder where the workbook is.
 - Funding directly to schools done in a single grant, how would that filter from the BIE funding down to us, someone always takes X amount of dollars out of it – some goes to indirect cost and administrative cost – and when it gets to the schools it's a lot less funding. We need to clarify that process.
 - How do they do audits and I need to take a look at those from all the schools.
 - Who is responsible for parental involvement on the organizational chart.
 - **BIE Response:** The funding for schools is derived through Education Program Management which is the BIE's administrative cost line item. If you review the DOI's Greenbook, you will see those line items. For school funding, you'll also see the Indian School Equalization Program funding for elementary and secondary education. Those two sources do not mix and BIE cannot take from the other.⁹⁹
 - Accountability workbook is currently underway and we have been working with the ED.
- ❖ Dolly Begay, Member, Navajo Nation School Board: The following questions were asked by the representative:¹⁰⁰

⁹⁴ Ibid., 136-138.

⁹⁵ Ibid., 136-137.

⁹⁶ Ibid., 137-138.

⁹⁷ Ibid., 139-141.

⁹⁸ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 141-149.

⁹⁹ Ibid., 150-153.

¹⁰⁰ Ibid., 153-154.

- Other tribes are depending on our tribe and we have to set a model and example for these other smaller tribes so they can follow and even help us.
- ❖ Bernadette Todacheene, Member, Navajo Nation School Board: The following statements were made by the representative:¹⁰¹
 - Replace school facilities that are 40 to 50 years old.
 - Provide schools and dorms with well-trained and certified teachers.
 - Raised concerns with the loans Navajo students are assuming.
 - Students start higher education but all end up in the remedial courses. Children are not prepared to go to higher education from some grant schools.
 - Our schools currently have been given millions of dollars from the BIE and BIA for the purpose of educating our children – the oversight of the Navajo nation is necessary to make sure that they are getting that education.
 - Highlights that current grant school board members are bringing in \$35,000 as stipends. That money should go to children.
- ❖ Marie Rose, Principal, Black Mesa Community School: The following questions were asked by the representative:¹⁰²
 - Concerned that there was a teacher pay increase for BIE teachers and not for grant school teachers. How can we get more funding for our grant projects?
 - We need a lot of money for our schools for technology. We have to run NASIS, FEMA, MIP (accounting tool), EMS, transportation data, SAM, NWEA, School Improvement programs day to day.
 - When will the positions for the reorganization be filled?
 - Will the reorganization be aligned to the Navajo Nation’s feasibility study?
 - Will the funds, the administrative support cost or the tribal support cost funds, go to the tribe?
 - BIE Response: A brief timeline is once consultation ends on the 1st of May, the comment period ends the 15th of May, then we begin a process called reprogramming which we have to go before Congress, once Congress approves, then we begin our process of moving existing staffing.¹⁰³
 - BIE Response: For ISEP funding, its formula based so BIE and tribes cannot touch a penny of that money. Tribal Support Costs – allocation of those funds are up to the grantees, it’s not a decision made by the BIE.
- ❖ Faye Blue Eyes, Assistant Executive Director, Dzilth-Na-O-Dith-hle Community School: The following comments and questions were asked by the representative:¹⁰⁴
 - The Blueprint is top-down and not focused on the experience of schools and administrators.
 - The Blueprint does describe the need for increased construction funding but does not adequately describe how facilities have depleted schools, ISEP funding.

¹⁰¹ Ibid., 155-165.

¹⁰² *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 165-169.

¹⁰³ Ibid., 169-171.

¹⁰⁴ Ibid., 173-179.

- The SIE offered \$1.2 million for six tribes – will those grants be renewed this year to those tribes or will they only be open to the five remaining tribes that did not receive the grant last year? Where are the funds coming from and what other kinds of programs are funded by that money?
- The BIE will consolidate its control in its office rather than fulfilling the intent and terms of the tribally controlled schools. There are many parts that imply or state that in order for the BIE Director to perform his or her responsibility to raise student performance in Indian country, he must be given authority over all the necessary functions that affects schooling, quality and performance, school management of operational functions, and competition between schools.
- Teacher recruitment and retention-Offering premium pay and benefits to recruit top-quality teachers to teach in BIE-funded schools, make a concerted effort to build and maintain desirable staff quarters in reservation communities, focus recruitment and training efforts on our own communities so tribal people will become our teachers, provide effective incentives for teachers who receive professional development assistance from a BIE school to stay at that school.
- When you refer to the Navajo Nation, is it the Board of Education or Matt Tso? When we look at those reorganizations up there, it's already preparing to be where the Navajo Nation is one grant. Under reform area three, who is driving this decision if it's not BIE?
- Under reform area four, many of our schools are already doing this. We work with Navajo Nation peacemaking courts, social services, state police, Navajo Nation police.
- What is our guarantee that BIE will change?
- Under reform area five, it says align budget to support self-determination – this has already been practiced by contract and grant schools.
- Align budgets to support teachers and principals – Yes, by fully funding tribal support costs, facilities, transportations, quarters, the list is endless.
- The Secretarial Order states immediate relief by school year 2014 – 15 Phase 1: Provide immediate relief to all BIE funded schools. It is April, where those immediate relief? We have not seen any relief.
 - **BIE Response:** Even though some grant schools have a one to eight staff to student ratio or one to twelve teacher to student ratio, but those schools are still not successful. This means we also need to look other solutions including looking at administration.¹⁰⁵
 - **BIE Response:** The FY15 budget for BIE and Education Construction reflects the boost in funding with an increase of \$40.9 million.
 - **BIE Response:** In the past 20 years, there has not been funding for tribal education departments from the BIE. Now, in a two-year span, we have received \$4.9 million for tribal education.
 - **BIE Response:** This plan is not about the one grant, it's about providing services to the school. The idea and concept is what we should be working as a district.

¹⁰⁵ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 179-193.

- **BIE Response:** When I say Navajo Nation, it is understood to be one process and it has to go to the committee, with a vote by the council and the president needs to sign it.
 - **BIE Response:** The funding increases in BIE’s FY15 budget contain no incentive funding; rather, there is funding for new school construction, tribal grant support costs going straight to your schools, other smaller increases for facilities operations and maintenance. These are the same requests for FY16.
 - **BIE Response:** The timelines have not been perfect. We are working with the administration and Congress to clarify the questions they have and implement the reorganization.
- ❖ **Bill Cly, School Board, Richfield Residential Dorm:** The following comments were made:¹⁰⁶
 - Requests that their school be kept on the list for funding to replace their building.
 - ❖ **Beverly J. Coho, Board Member, Ramah Navajo School:** The following comments were made:¹⁰⁷
 - Explained the history of the Ramah Navajo School.
 - Urged the Navajo Nation and BIE to preserve the locally elected school boards.
 - ❖ **Roland Dixon, Vice President School Board, Kayenta Community School:** The following questions were asked by the representative:¹⁰⁸
 - Discussed the low number of schools that have met AYP and attributes the problem to the lack of qualified teachers in these schools.
 - ❖ **Sally Joe, Board Member, Kinteel Residential Campus:** The following questions were asked by the representative:¹⁰⁹
 - Voiced her support for the one-grant. She has worked with the schools and is tired of the BIE. We want the full money. We do not want the money to go to the tribe but directly to the schools.
 - **BIE Response:** There have been a large number of evaluations that were not done of teachers, of principals, of ADDs, of ELOs and principals. We need to ensure we get the right people – that’s where the school boards come into play.¹¹⁰
 - **BIE Response:** The funding that goes to schools goes directly to schools. So that funding, no matter if the tribe takes over single grant or not, there’s no way they can touch that funding and take it away. It’s in the 25 CFR for the ISEP formula.
 - **BIE Response:** Funding is laid out in the Indian Affairs budget request. The only place where some money is being used for full time employees is the \$14 million for education program management. But that is to run a school system of 183 schools in 23 different States. The tribal grants for Navajo Nation to manage 60 schools is larger than the BIA’s program management funds.

¹⁰⁶ Ibid., 194-201.

¹⁰⁷ Ibid., 204-211.

¹⁰⁸ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 212-218.

¹⁰⁹ Ibid., 218-222.

¹¹⁰ Ibid., 223-230.

- ❖ Len Chester, School Board Secretary, Greasewood Community School: The following questions were asked:¹¹¹
 - The Greasewood School falls under the Fort Defiance Agency and they are being placed at the Chinle ERC. If you drive from Greasewood Springs to Chinle, it is 57 miles. If you drive to Window Rock, it is 58 miles. Does one mile make a difference.
 - BIE Response: We will let the Navajo ADD determine the type of fit for where you want to obtain your services.¹¹²
 - BIE Response: The school operational services will move from BIA because education is the BIE's focus and speciality. BIA does not have expertise in educational facilities.
- ❖ Peterson Zah, Grandfather: The following comments were made:¹¹³
 - Provided a history of the self-determination program and efforts that occurred with the Navajo Nation.
- ❖ Carolyn Coho, Member, School Board, Ramah Navajo School Board: The following comments were made:¹¹⁴
 - Any cuts in funding should be done at the central office in the Washington DC area. All funding should go to the schools for major repairs, new construction of facilities, funding for teachers, vocational education program, scholarship for students, Head Start programs, residential programs, and adult education programs.
 - Grants and contract schools on the Navajo reservation are a vital part of the grassroots endeavors of the community and should continue to operate as such.

Written Comments Received from the Southwest Region

- ❖ "A Worthy Goal": Email from Roseria Astor, Legal Secretary, San Carlos Apache Tribe of San Carlos, Arizona, transmitting the Tribe's comments on the BIE restructuring, dated May 15, 2015: The Tribe believes that the goal of transforming BIE is a worthy one and it mirrors the Tribe's own vision for its educational future. The goal will be achieved through a dedicated effort to prepare Native Americans to serve their own communities as teachers and administrators. This effort will reshape western-imposed educational mandates into an expression of unique tribal culture which will serve tribal needs. The Tribe encourages BIE to make an investment focused on helping Native American youth become teachers.
- ❖ Transparency: Letter from the Hopi Tribe of Kykotsmovi, Arizona dated April 27, 2015: The Hopi Tribe is requesting the BIE be transparent with the implementation of the plans as they affect the Hopi Tribe and the Hopi schools. Questions regarding Phase I include: (1) Will the proposed office (ADD Grant) in Albuquerque, NM be in operation prior to the closure of the Kearns Canyon Line Office? (2) When will the Keam's Canyon office be closed, and what will happen with the staff currently employed at the Keam's Canyon office? (3) Under Section 2020,

¹¹¹ Ibid., 230-235.

¹¹² Ibid., 235-242.

¹¹³ Ibid., 242-251.

¹¹⁴ *Bureau of Indian Education Reorganization – National Tribal Consultation in Mentmore, New Mexico*, Mentmore: Bureau of Indian Education, 27 April 2015, 251-254.

Tribal Education Departments have been funded \$2 million dollars. As of today, the Hopi Tribe has not been made aware of how these funds will be disseminated to the Tribes. What is the timeline for this? Lastly, the Hopi Tribe expressed its commitment to improving Hopi education.

- ❖ The Effects of Restructuring on the Hopi Tribe: An email dated May 14, 2015, from Carlene Tenakhongva, Staff Assistant, Office of the Chairman, The Hopi Tribe, transmitted additional comments from the Hopi Tribe regarding the current plans for BIE's restructuring with an attached letter signed by The Hopi Tribal Chairman Herman G. Honanie. These comments include questions regarding the Keams Canyon office (whether this office can be contracted under P.L. 93-638) and the functions of the BIE positions and how they will interact with the schools. Specifically, the Hopi Tribe requests that the Keams Canyon office remain as the Education Resource Center for all the Hopi schools. Finally, the Hopi Tribe requests funding support from the BIE to develop and implement a true Tribal Education Department like what was afforded to the Navajo Tribe.
Note: BIE met with the Hopi Tribal Chairman and Tribal Education Department on August 13, 18, and 28, 2015. The Chairman is currently in the process of filing an intent to 638 the Education Line Office services.
- ❖ Recommendations for BIE Restructuring: Sent April 27, 2015, Dine Bi'Olta School Board Association, Inc. (DBOSBA) Testimony on BIE Restructuring Consultation from Angela Barney Nez, Executive Director offers a few recommendations for BIE restructuring. These include recommendations regarding the creation of a BIE Division of Budget Analysis, the inclusion of staff with administrative experience on the Solutions Teams, the negotiation of P.L. 93-638 contracts with tribes that wish to assume the regulatory and technical assistance functions of the Bureau with respect to the tribal schools, and details on tribal planning grants for tribes.
- ❖ Diné Bi Olta School Board Association (DBOSBA) Other Comments: An email dated May 15, 2015, from Daphne Thomas transmitted DBOSBA, Inc. comments, included the testimony and position statement of DBOSBA concerning a proposed amendment to the ESEA - The Department of Defense Schools Option and the DBOSBA Response to the Draft Report on the Redesign of the BIE Prepared by the American Indian Education Study Group.
- ❖ Concerns Regarding BIE Reorganization: An email dated May 7, 2015, from Lemuel Adson, Superintendent, Shonto Preparatory School with attachment, describes several problems regarding the details of BIE reorganization. He expresses concern about how reorganization will support the Navajo-specific Sovereignty in Education grant as well as what the different roles of federal employees will be in the new BIE structure. In particular, he raises questions about chains of command and from whom federal employees will take direction, noting that they must recognize their role of support rather than top-down enforcement. Finally, he asks for further specifics on timelines and plans.
- ❖ Navajo Nation School Takeover: An email dated May 21, 2015, from Veronica Smith, Executive Secretary, Alamo Navajo School Board, Inc., on behalf of Dr. Pfeiffer with an attached letter transmitting "Comment on Tribal Consultation on the Bureau of Indian Education Reorganization" signed by Steve GueTo, Alamo Navajo School Board, Inc., President and Stanley Herrera, President of the Alamo Navajo Chapter, expresses disagreement with any plans for the Navajo Nation to take over schools like the Alamo Navajo Community School. It explains that the Department of Interior must do better in reaching out to Navajo schools and describes the limitations of the Navajo Nation's ability to support Alamo.

TRIBAL CONSULTATION 4: Webinar April 29, 2015

The meeting had 28 attendees with no tribal leaders but representatives from a tribal education department, schools, and a congressional researcher.

- ❖ Presentation of Reorganization: BIE staff began the tribal consultation with an overview of the reorganization Blueprint, Secretarial Order #3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.¹¹⁵

Comments from Attendees

- ❖ Education Line Office Movement to ERC: The webinar participant asked why they need to be reassigned to the ERC in Albuquerque and not to Phoenix, which is in their backyard.
 - BIE Response: In the reorganization the ERC support is specific to the type of school -- tribally controlled schools or bureau operated schools. Both types of schools have unique elements in terms of their needs.¹¹⁶
- ❖ Facilities and Maintenance: The webinar participant asked how the reorganization will impact the Facilities and Maintenance functions.
 - BIE Response: Currently, responsibility for facilities management is under the Bureau of Indian Affairs. We intend to have a comparable regional facility manager at the ADD. Currently, there is no impact to the facilities and maintenance program. We are also seeking additional funding in facilities and maintenance for our schools in the FY 2016 Budget proposal.¹¹⁷
- ❖ Grant Officer Role in the ERC: What are the duties of the grant officer that will be housed in the ERC and the ADD?¹¹⁸
 - BIE Response: We are currently in the process of updating position descriptions.¹¹⁹
- ❖ Procurement and Contracts Role in the ERC: Where will the Procurement and Contract responsibilities be for the BIE schools? Which positions would be responsible for procuring books and supplies?¹²⁰
 - BIE Response: Currently procurement and contract authority is under the Bureau of Indian Affairs. There are two areas of reorganization planned and this reorganization deals with the

¹¹⁵ *Bureau of Indian Education Reorganization – National Tribal Consultation Webinar*. Bureau of Indian Education, 29 April 2015, 2-55.

¹¹⁶ *Bureau of Indian Education Reorganization – National Tribal Consultation Webinar*. Bureau of Indian Education, 29 April 2015, 56.

¹¹⁷ *Ibid.*, 57-60.

¹¹⁸ *Ibid.*, 60.

¹¹⁹ *Ibid.*, 60-62.

¹²⁰ *Ibid.*, 63, 74.

academic structure. We are working with the BIA Deputy Assistant Secretary for Management to formulate next steps.¹²¹

- BIE Response: The procurement of books and supplies will not be specific to any new position in this reorganization at this time. It will be done the way the schools currently purchase books and supplies.¹²²
- ❖ Transition from BIE operated to Tribally Controlled: The webinar participant asked how will that transition be supported or encouraged.¹²³
 - BIE Response: If tribes want to convert their BIE operated schools to tribally controlled, this is supported through self-determination. It's been a process that has always been a part of the BIE as evidenced by the 129 tribally controlled schools currently operating throughout the BIE.¹²⁴
- ❖ E-rate Grant Support from BIE: The webinar participant inquired about receiving funds from the increase in BIE's budget for technology to support their E-rate application.
 - BIE Response: The increase in budget for technology is not to ensure we have a common operating environment. The increase is for our schools to increase their bandwidth – which would be directed to schools in very remote areas. The increase in bandwidth will support schools using PARCC and Smarter Balance assessments.¹²⁵
- ❖ ESEA Waiver: The webinar participant asked about the ESEA waiver to develop a common curriculum for BIE operated schools. What was the Department of Education's response and how will the ERC coordinate with States to keep up with the changing State' curricula?¹²⁶
 - BIE Response: BIE withdrew the waiver at the end because the alternative was ruled not done. BIE has to go back out for negotiated rule-making.¹²⁷
- ❖ Provide Incentives Described in Blueprint: The webinar participant asked what we mean by providing incentives, will there be additional money coming through?¹²⁸
 - BIE Response: Incentive areas are items such as the National Board Certification initiative where BIE is paying for teachers to go through the process of certification with bonuses. In terms of tribes, we have funds to support tribes with the Sovereignty in Indian Education initiative to help tribes consolidate their management systems to better operate schools.¹²⁹
- ❖ Timeline to Reorganize the BIE: What is the timeline for the reorganization to be in place?¹³⁰
 - BIE Response: BIE is looking at 2015 as much as possible. We know that it may take a while especially to recruit in certain areas and we need services in the schools.¹³¹

¹²¹ Ibid., 63-66.

¹²² Ibid., 74.

¹²³ Ibid., 66.

¹²⁴ Ibid., 66-70.

¹²⁵ *Bureau of Indian Education Reorganization – National Tribal Consultation Webinar*. Bureau of Indian Education, 29 April 2015, 71-73.

¹²⁶ Ibid., 75.

¹²⁷ Ibid., 75-79.

¹²⁸ Ibid., 80.

¹²⁹ Ibid., 80-82.

¹³⁰ Ibid., 83.

- ❖ Contract vs. Grant Schools: The webinar participant asked if there is any difference in supporting tribal-contract schools versus tribal grant schools especially regarding accountability and financial management.¹³²
 - BIE Response: The difference is contract schools operate through a 638 contract with the BIA. The contract changes who oversees and monitors the funding that goes to a tribally controlled school. For grant schools, the BIE provides the funds directly to the schools and they will receive tribal grant support costs for their administrative cost needs.¹³³
- ❖ Clear Communication: The webinar participant asked how the new structure will promote a consistent message and response to all BIE-schools on what schools can and cannot do.¹³⁴
 - BIE Response: Communication is identified as an area to be addressed under the Secretarial Order 3334. Some efforts currently underway are monthly stakeholder calls, regional calls by the Director's Office, increased visibility on social media, and improving our website to ensure information is delivered on time and adequately.¹³⁵
- ❖ North Dakota and South Dakota Impact: The webinar participant asked why there is an Education Resource Center, a technical assistance center, a facilities support center, and administrative support center in North and South Dakota.¹³⁶
 - BIE Response:
 - Education Resource Centers will focus on the specific needs and functions of schools – both tribally controlled schools and bureau operated schools have different needs. Tribally controlled schools require directed services to build capacity while BIE-operated schools are managed and operated by the BIE.
 - Technical Assistance Centers have been established by five tribes that have entered into agreements with the BIE to contract to provide the services that were offered by Education Line Offices. The five tribes that have established Technical Assistance Center agreements are: Rosebud Sioux Tribe, Standing Rock Sioux Tribe, Crow Creek Sioux, Lower Brule Sioux, and Sisseton Wahpeton.
 - Facilities Support Centers will be established at sites to continue support for facilities maintenance and operations staff. These sites will remain open to strictly focus on continued service to the schools.
 - An Administrative Support Center will be established at only one site, at Oklahoma City, OK. This site services a significant number of contracts for Johnson O'Malley and will take on this function as a JOM Center.¹³⁷
- ❖ Final FTE Count Compare to the Current: The webinar participant asked what the total FTE is currently and what it will be when fully staffed.¹³⁸

¹³¹ Ibid., 83-84.

¹³² Ibid., 84.

¹³³ Ibid., 84-86.

¹³⁴ Ibid., 87.

¹³⁵ Ibid., 84-86.

¹³⁶ *Bureau of Indian Education Reorganization – National Tribal Consultation Webinar*. Bureau of Indian Education, 29 April 2015, 90.

¹³⁷ Ibid., 90-94.

BIE Post-Consultation Response: This estimate has been revised to be 95 FTE through Education Program Management, 39 FTE through Education, and 24 staff funded by Enhancement funds. When the reorganization is complete, it is expected that we will have a total of 196 staff.

¹³⁸ Ibid., 95.

**TRIBAL CONSULTATION 5: RENAISSANCE, 10 NORTH BROADWAY AVENUE, OKLAHOMA CITY, OK
May 1, 2015**

The meeting had 41 attendees with tribal leaders from Absentee Shawnee Tribe Governor Edwina Butler Wolfe, Apache Tribe of Oklahoma Secretary/Treasurer Yolanda Reyna, Caddo Nation Chairman Tamara Francis Fourkiller; tribal administrators and staff.

- ❖ Presentation of Reorganization: BIE staff began tribal consultation with an overview of the reorganization, the Blueprint, Secretarial Order 3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.¹³⁹

Comments from Tribal Leaders

- ❖ Absentee Shawnee Tribe, Governor Edwina Butler Wolfe:
 - Does not want to close down the Education Line Office – educators have depended on that office as a resource for the tribe’s students. Will the Business Office still fulfill the role as an in-state resource to call and ask for guidance on whatever situation that a child needs in the school system?
 - Referenced the problems with public school systems in Oklahoma. They finally have a Native American on the Shawnee Public School board.¹⁴⁰
- ❖ Apache Tribe of Oklahoma, Secretary/Treasurer Yolanda Reyna:
 - Requests dollar figures presented on the current filled offices in the Oklahoma City areas and how it’s cost effective to go to Minnesota or South Dakota? We have 39 tribes in Oklahoma.
 - Requests a scholarship program to be established.¹⁴¹
- ❖ Caddo Nation, Chairman Tamara Francis Fourkiller:
 - Concern that eliminating the ERC will be a disservice to tribes in Oklahoma by removing a resource, particularly for college-interested students. The tribe is just receiving their 638 programs back from BIA, and will take care of its students, regardless of their location. But if you (BIE) take that organization, that group, away from these tribes that are all here, they’re doing us a disservice because they are knowledgeable about their unique needs first-hand. There are 39 tribes in Oklahoma.¹⁴²
- ❖ BIE Responses: What services are being taken away? If you ask that question, the answer is none of them. We are not taking away an office – those functions that are being done now are going to stay there. The office is primarily handling contracting issues, Adult Education or Johnson O’Malley

¹³⁹ *Bureau of Indian Education Reorganization – Additional Tribal Consultation in Oklahoma City, Oklahoma*. Oklahoma City: Bureau of Indian Education, 1 May 2015, 3-92.

¹⁴⁰ *Ibid.*, 92-98.

¹⁴¹ *Ibid.*, 99-102.

¹⁴² *Ibid.*, 102-106.

(JOM). The reason is most of your schools are tribally controlled schools. Chairman Fourkiller Responds: Not all the schools are not run by the tribes, they are public schools.¹⁴³

- BIE points out that Oklahoma has five schools in Oklahoma and we are currently addressing a reorganization for schools that are under 100-297, not for state run public schools. There is only one school that is BIE operated.
- The business center will still remain open to process the 638 grants.
- Currently, the BIE cannot tell what a tribally controlled school should do. Only the BIE operated schools. The tribe has the authority.

Comments from Tribal Administrators and Staff

- ❖ Muscogee Creek Nation, Secretary of Education and Training, Wayne Johnson:
 - We have 16,000 Native American children in my Johnson O'Malley (JOM) program within the Creek jurisdiction.
 - Member of the Tribal Education Departments and National Assembly because they want representation in the BIE.
 - We could work together and find out what kinds of services the Oklahoma City office provides for us.¹⁴⁴
 - **BIE Response:** There has been a lot of thought put into the idea of the business center. We have also provided funding for Tribal Education Departments.¹⁴⁵
- ❖ Cherokee Nation, Director Government Relations, Kim Teehee:
 - We have 27,000 students in public schools and over 24,000 that participate in JOM programs.
 - We rely on the Oklahoma office for training, technical assistance, program development, compliance with the federal programs like JOM. We hope to grow our JOM program.
 - Consider making Oklahoma City an ERC center.¹⁴⁶
- ❖ Chickasaw Nation, Under Secretary for the Department of Community Services, Thomas John:
 - What does the Research and Sovereignty office looks like? Can we get information?
 - What can you do for the other 99 percent of Indian Youth that are primarily in the public school system?¹⁴⁷
 - **BIE Response:** There is an additional PowerPoint that goes into detail with the other offices outlined in there. In terms of direct oversight over the 99 percent, we currently don't have any direct control other than indirectly through JOM.¹⁴⁸
- ❖ Jones Academy, Brad Spears:
 - Was surprised Oklahoma was not on the first round of tribal consultations.

¹⁴³ Ibid., 106-127.

¹⁴⁴ *Bureau of Indian Education Reorganization – Additional Tribal Consultation in Oklahoma City, Oklahoma.* Oklahoma City: Bureau of Indian Education, 128-134.

¹⁴⁵ Ibid., 134-139.

¹⁴⁶ Ibid., 138-144.

¹⁴⁷ Ibid., 146-158.

¹⁴⁸ Ibid., 138-155.

- Concerned that the mileage for Flandreau, SD was different.
- The school receives assistance with Native Star, annual reports from the ELO.¹⁴⁹

Oklahoma Region 7 Written Comments

- ❖ Opposition to Oklahoma City's Exclusion from ERCs: A letter dated April 16, 2015, from the Choctaw Nation of Oklahoma Jones Academy signed by Brad Spears, Superintendent of Jones Academy, expresses opposition to the BIE's proposal to abolish the Oklahoma Area Education Office converting to a two person operation. They state that the proposed Flandreau ERC would not serve the Flandreau Indian School as it is BIE-operated, not tribally operated.
- ❖ Opposition to Oklahoma City's Exclusion from ERCs: An email dated April 21, 2015, from Franklin McGeisy includes comments and questions regarding the Oklahoma office decision. He expresses concern that the Oklahoma Tribal representation and population of Native people are not considered in this plan and asks that Oklahoma have an Education Resource Center.
- ❖ Opposition to Oklahoma City's Exclusion from ERCs: A letter dated May 11, 2015, from Joy Hofmeister, State Superintendent of Public Instruction, Oklahoma State Department of Education, of Oklahoma City, OK to AS-IA Washburn, expresses concerns with a recent decision by the BIE to designate a proposed ERC in Flandreau, SD instead of Oklahoma City, OK. It states that the Oklahoma State Department of Education cannot support a planned reorganization of primary education resources in which American Indian students and Indian Education programs are abandoned in favor of a new ERC office in Flandreau, SD. They hope the BIE will reconsider and relocate the proposed business function in Flandreau, while designating Oklahoma City as the ERC to serve the State's region.
- ❖ Opposition to Oklahoma City's Exclusion from ERCs: An undated document provided to Dr. Roessel during tribal consultation was The Inter-Tribal Council of the Five Civilized Tribes, A Resolution in Opposition to the BIE Proposed Restructuring and Streamlining Plan where the Existing Oklahoma City BIE Office is not designated as one of the Seven Proposed Education Resource Center Offices for Tribally Controlled Schools.
- ❖ Opposition to Oklahoma City's Exclusion from ERCs: A letter dated April 27, 2015, from Apache Business Committee of Anadarko, OK from Vice-Chair Sheila Paddlety-Twins, Apache Tribe of Oklahoma, expresses opposition to the BIE's proposal to abolish the Oklahoma Area Education Office (OAEO). They do not find any apparent logistical or staffing efficiency justification for the Oklahoma schools to be served by an ERC office located in Flandreau, SD. The Apache Tribe of Oklahoma has adopted a Resolution in opposition to the BIE proposed restructuring and streamlining plan where the existing Oklahoma City BIE office is not designated as one of the seven proposed ERC offices for tribally controlled schools. The Apache Tribe of OK recommends that as part of Streamlining Plan, the proposed business office be established in Flandreau, SD, and that the existing Oklahoma City, OK, BIE office be designated as the ERC office that is proposed for Flandreau, SD.
- ❖ Opposition to Oklahoma City's Exclusion from ERCs: An email dated May 16, 2015, from Michael Segroves, Architect/AICP, Eastern Oklahoma Tribal Schools, transmitting comments from the Eastern Oklahoma Tribal Schools Facilities Management Program of the Choctaw

¹⁴⁹ Ibid., 155-160.

Nation of Oklahoma, Edmond, Oklahoma, lodges his opposition to the decision of the BIE to eliminate the Oklahoma Area Education Office (OAEEO) by relocating its education support functions to a region where numerous other BIE support offices are to be positioned.

- ❖ Opposition to Oklahoma City's Exclusion from ERCs: An email dated May 22, 2015, from Canaan Duncan, Government Relations, with attached letter from the Cherokee Nation of Oklahoma and Inter-Tribal Council of the Five Civilized Tribes Resolution 15-17, "A Resolution in Opposition to the BIE Proposed Restructuring and Streamlining Plan where the Existing Oklahoma City BIE office is not designated as one of the seven proposed education resource center offices for Tribally Controlled Schools," signed by Bill John Baker, Principal Chief of the Cherokee Nation, expresses opposition to a BIE reorganization plan in which the Oklahoma City BIE office is designated a Business Support Center rather than an Education Resource Center (ERC). They are concerned that designating the Oklahoma City office as a Business Support Center will drastically reduce the educational services of the office, causing the new office that emerges to be ineffective. They feel that just because most of their students attend public schools does not absolve BIE of its trust responsibility to provide educational services to all our students living within our borders, and that the proposed ERC is too far away to adequately support their students. They state that the Oklahoma tribes are united in opposing the reorganization plan.
- ❖ BIE Response: In response to the many concerns about eliminating the Oklahoma City office and tribal leaders concerns regarding Native students attending non-BIE public schools in the state, the BIE has chosen to transform the Oklahoma City ELO into a National JOM Center. The National JOM Center will process all business for JOM funding for tribes around the country and also provide technical assistance regarding use of those funds.

TRIBAL CONSULTATION 6: ISLETA CASINO, SEMINAR ROOM, ALBUQUERQUE, NM
May 15, 2015

The meeting had 45 attendees with the following tribal leaders in attendance: Isleta Governor Paul Torres, Zia Governor David Pino, Executive Director Rick Vigil, Santa Clara Representative Joe Abeyta, Ohkay Owingeh Head Councilman Joe Garcia, Acoma President Zachary Garcia, Acoma Governor Fred Vallo, Isleta Tribal Council President Frank Lujan, Navajo Nation President Russell Begay, and school boards and administrators.

- ❖ Presentation of Reorganization: BIE staff began tribal consultation with an overview of the reorganization, the Blueprint, Secretarial Order 3334, Proposed Changes, and the Proposed Organizational Charts for all Divisions and Area Regions.¹⁵⁰

Comments from Tribal Leaders

- ❖ Reorganization: A Pueblo leader asked about the full-time employee (FTE) numbers; funding for the staffing; the type of training for staffing; the implementation process; the number of schools for the Albuquerque ERCs; the role of the ADD for Tribally Controlled Schools; and the process for tribal feedback on the delivery of services.¹⁵¹
 - BIE Response: BIE referenced the tribal consultation materials and the presentation that covered the earlier segment of the tribal consultation.
- ❖ Educational Control: One Pueblo tribe is currently taking over their school and voiced concerns over the challenges undertaking this effort; another Pueblo leader inquired about how they can take more control and how to take ownership; another Pueblo leader asked if tribal control is a success and if it's the right answer to the needs of students.¹⁵²
 - BIE Response: In the past year, BIE has developed a data-sharing agreement that is a template that any tribe can enter into to have access to data. Tribal Education Departments have the opportunity to have data to work with their schools to try to increase educational outcomes.¹⁵³
- ❖ ¹⁵⁴Training for School Boards: A Pueblo leader expressed a need for more school board training to help them understand their roles and responsibilities and to conduct training 'before mistakes are made'.¹⁵⁵
 - BIE Response: This restructuring takes this need for help into account by establishing the Education Resource Centers, that will have people looking out for the schools and providing the assistance and information needed for the schools to operate.¹⁵⁶

¹⁵⁰ *Bureau of Indian Education Reorganization – Additional Tribal Consultation in Albuquerque, New Mexico*. Albuquerque: Bureau of Indian Education, 15 May 2015, 4-39.

¹⁵¹ *Ibid.*, 41-42.

¹⁵² *Ibid.*, 88-89

¹⁵³ *Ibid.*, 98.

¹⁵⁴ *Ibid.*, 40.

¹⁵⁵ *Ibid.*, 41-43.

¹⁵⁶ *Ibid.*, 44.

- ❖ Funding for Schools: A Pueblo leader expressed concern that school funding is based on a three year average and is unpredictable and inquired about how they ensure funding is secure and adequate? Another leader inquired about the reorganization’s impact on funding for tribally controlled schools.¹⁵⁷
 - BIE Response: By converting to grant status, the employees will be tribal employees, and the processes will be controlled by the tribe, so that there is much more local control over issues¹⁵⁸
- ❖ Need for Research: A Pueblo leader expressed support for BIE to conduct local research to understand what is working for communities and what is not working.¹⁵⁹
 - BIE Response: BIE expressed agreement and explained that it is reinstating the research office and trying to get that research and apply money down at the local level.¹⁶⁰
- ❖ Support for Proposed Relocation of ERC: A Pueblo leader noted that the closure of the northern BIE office and the move of the ELO to Albuquerque as an ERC will provide the opportunity for schools to get access to necessary resources like technology.¹⁶¹
 - BIE Response: The comment period has been extended until May for additional written comments. Request was made to please submit updated data into FMIS if it had not already been submitted.¹⁶²
- ❖ Science, Technology, Engineering and Math (STEM) fields: A Pueblo leader inquired about how will BIE improve these in schools.¹⁶³
- ❖ Less Oversight of Tribally Controlled Schools: A Pueblo comment was that they thought P.L. 100-297’s purpose was to reduce oversight by the Bureau and that it should be tribal oversight. They wanted BIE to have less input on tribally controlled schools.¹⁶⁴
 - BIE Response: Solutions should come from the Tribes, and a big part of BIE’s plan is to build tribal capacity to operate their schools through the Sovereignty in Indian Education initiative. ¹⁶⁵
- ❖ Support for the Reorganization: A Pueblo leader stated, “I would just like to encourage you to keep moving forward with this and getting more input from Tribes.”¹⁶⁶
- ❖ Tribal Support Costs: A Pueblo leader asked that as tribes continue to convert from BIE-operated to tribally controlled, there is a request for increased funding for tribal grant support costs.¹⁶⁷
 - BIE Response: Budget planning to include an increase in school conversions to tribal controlled already occurs. For instance, the FY16 budget included a request that would have

¹⁵⁷ Ibid, 46.

¹⁵⁸ 47.

¹⁵⁹ Ibid., 64.

¹⁶⁰ Ibid., 67.

¹⁶¹ Ibid, 47-51.

¹⁶² Ibid, 59

¹⁶³ Ibid, 75.

¹⁶⁴ Ibid, 74.

¹⁶⁵ Ibid, 98.

¹⁶⁶ Ibid, 111.

¹⁶⁷ Ibid, 117.

supported more than 100% of tribal grant costs, because of the understanding more schools would convert.¹⁶⁸

Written Comments Received from New Mexico Region

- ❖ Concerns Over Process: Document presented at Isleta Pueblo, NM Tribal Consultation by Ohkay Owingeh, Signed by Ben Lujan, 1st Lt. Governor, dated May 15, 2015: Concerns were expressed about the entire process, including communication and scheduling. Overall, the document expressed that categorical inclusion of all BIE-funded schools into one category is not appropriate. Official requests were made, including: a one-on-one meeting between BIE and Ohkay Owingeh, a visit to the new OOCS Facility, a discussion of funding for OOCS, a comprehensive assessment of current tribally controlled schools separate from BIE operated schools with tribal involvement, and a written document of all consultation input. Additional questions were raised regarding funding and additional hiring. Furthermore, questions were raised specifically to Phases I & II of Secretarial Order 3334. It was also pointed out that the current Tribally controlled schools are in a different category than are the BIE Operated Schools in terms of most all areas, such as: operations, curriculum performance, technology, math, science, tradition, culture, language, development, facilities improvements, maintenance, etc. Lastly, Ohkay Owingeh expressed frustrations over the administration of PARCC tests.
- ❖ Proxy from Santa Clara Governor: On May 18, 2015, received Proxy from J. Michael Chavarria, Santa Clara Governor authorizing Joseph Abeyta, Tribal Representative to act on his behalf in connection with any and all matters relating to the BIE Tribal Consultation Meeting to be held on Friday, May 15. No comments were included with the proxy.

Written Comments Received from Alaska Region

- ❖ Funding for Alaska Tribally Controlled Schools: An email dated April 23, 2015, transmitting a letter from The Native Village of Kotzebue of Kotzebue, AK from Ukallaysaaq Tom Okleasik, Executive Director, expresses the need for BIE restructuring plans to address funding for Alaska tribally controlled schools. The letter explains that the Tribe has operated a tribal school for grades P-K-1 since 1998 and has yet to receive any BIE support despite a formal request via resolution from their Tribal Council. Their Tribal Council supports amending the Department of the Interior annual appropriations act via Resolution 13-131. They have the support of the Alaska Federation of Natives via Resolution 13-40, the National Indian Education Association via Resolution 2014-18, and the National Congress of American Indians via 14-001.
 - BIE Post-Consultation Response: Dating back to 1983, BIE schools in Alaska were transferred to the State consistent with the Alaska State constitution to establish a single school system in Alaska. The transfer was outlined in law and has been subsequently included in the annual Interior Appropriations Bill, along with a moratorium on expanding the size of the BIE system past what it was in 1995.

¹⁶⁸ Ibid, 119.

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APPENDIX: Consultation Participants

<u>No.</u>	<u>First Name</u>	<u>Last Name</u>	<u>Title</u>	<u>Tribe/Organization</u>
Rapid City, SD - April 22, 2015				
1	Dave	Archambault	Consultant	Standing Rock Sioux Tribe
2	Jane	Azure	Sped Director	Eagle Butte
3	Emma Jean	Blue Earth	Director	Standing Rock Sioux Tribe-TED
4	Deb	Bordeaux	Member	Oglala Sioux Tribe Consultant
5	Patti	Busch	Bus Manager	Sicangu Owayawa Oti
6	Prairie Rose	Chapin	Federal Program Manager	Three Affiliated Tribe
7	Collins	Clifford Jr.	Council Rep.	Oglala Sioux Tribe
8	Robert	Cook	TFA/NIEA	Oglala Sioux Tribe
9	Elfreda	Cottier	Data/Reporting Specialist	Oglala Sioux Tribe
10	Charles	Cuny	Principal	Oglala Sioux Tribe
11	Brandon	Ecoffey	Editor	Indian Country Today and Lakota Country Times
12	Cherie	Farlee	TEA Director	Cheyenne River Sioux Tribe
13	Harold	Frasier	Cheyenne River Sioux Tribal Chairman	Cheyenne Sioux River Tribe
14	Johnilyn	Garrett	Tribal Council	Cheyenne River Sioux Tribe
15	Gay	Kingman		Great Plains Tribal Chairmans Association
16	Dr. Gloria	Kitsopoulos	Superintendent American Horse School	American Horse School
17	Tim	Lanfointe	RD-BIA	Resiand Office

18	Linda	Lawrence	Superintendent	Standing Rock Sioux Tribe
19	Taylor	Little Whiteman	Board Member	Little Wound School
20	Tuffy	Lunderman	Rosebud Sioux Council Rep	Sicangu
21	Darrim	Merrin	Parent	Pine Ridge
22	Merrie	Miller	Council Representative	Cheyenne River Sioux Tribe
23	ChipBird	Necklace	Title I Director	Cheyenne River Sioux Tribe
24	McKenzie	Nelson	Reporter	KEVN
25	GR	Paulhamus	Superintendent	Cheyenne River
26	Stacy	Phelps		Wounded Knee District School
27	Patrick	Ross	OST ED Comm.	Oglala Sioux Tribe
28	Eliana	Sheriff	Reporter	KEVN
29	Dan	Shroyer	Ed Consultant	Many
30	Natalie	Stites		
31	Walt	Swan Jr.	Superintendent	Cheyenne River Sioux Tribe- Takani
32	Jesse	TakenAlive	T.C. Member	Standing Rock Sioux Tribe
33	Beverly	Tuttle	School Board Member	Porcupine School
34	Misty	Tyon	Business Manager	Wounded Knee District School
35	Matt	Uogel	Legislative Tech	Cheyenne River Sioux Tribe
36	Carol	Veit	Superintendent	Cheyenne River Sioux Tribe
37	Sandra		Representative	Oglala Sioux Tribe Loneman school
38	Frankee	WhiteDress	Principal	Porcupine

39	Karen	WhiteHouse	Homeliving Specialist	Yankton Sioux Tribe
40	Suzanne	WhiteLance	Business Manager	Oglala Sioux Tribe
41	Iris	Wilson	Teacher	Pine Ridge School,
42	Royal	YellowHawk	Executive Director Rosebud Sioux Tribe-treaty	Rosebud Sioux Tribe
43	[Name not provided]		Council Rep.	Standing Rock Sioux Tribe
44	[Name not provided]		OST	Oglala Sioux Tribe

**Nashville, Tennessee -
April 24, 2015**

45	Kathy	Brown	Education Co-Chair	United South and Eastern Tribes
46	Kitcki	Caroll	Education Co-Chair	United South and Eastern Tribes
47	Hank	EdmoMcArthur	Operation Manager	Shoshone-Bannock Jr/Sr High School
48	Chris	Katzenmiller	Budget	Bureau of Indian Affairs-Bureau of Indian Education
49	Eric	Lords	Superintendent	Shoshone-Bannock School District
50	Johnny	Parham	Region Facility Manager	Bureau of Indian Affairs-Eastern
51	Kandice	Watson	USET Education Co-Chair	United South and Eastern Tribes

Mentmore, New Mexico - April 27, 2015

52	Davin	Allison	Facility Operation Specialist	Bureau of Indian Education Facility Management
53	Angela	Barney Nez	Director	Dine Bi Olta School Board Association

54	Raymond	Barry	Board Member	Ch'ooshgai Community School
55	Albert	Becenti	Facility Manager	Hunters Point School
56	Earla	Begay	Chief Financial Officer	Ramah Navajo School Board
57	Lavaye	Begay	HLS	Wingate High School
58	Dr. Pauline M.	Begay	NNBOE President	Navajo Nation
59	Alta	Begay	Parent Liaison	Hunters Point Boarding School
60	Rene	Begay	Board Member	Black Mesa Community School
61	Dolly C	Begay	President	Navajo Nation Board of Education
62	Cordella	Begay	Business Manager	New Mexico Navajo North
63	Art	Ben	Principal	Lukachukai Community School
64	Harrison	Bia	Board Member	Many Farms High School
65	Sarah E	Bia		Many Farms High School
66	Faye	BlueEyes	Assistant Executive Director	Dzilth School
67	Alberto	Castruita	Principal	Crystal Boarding School
68	J. Michael	Chavarria	Governor	Santa Clara Pueblo
69	Melvin T	Chavez	F.O.S	Bureau of Indian Education Facility Management
70	Cheryl	Chavez	Board Member	Pueblo Pintado School
71	Bill	Cly	Board Member	Richfield Residential
72	Beverly	Coho	Board Member	Ramah Navajo School Board, Inc.
73	Carolyn	Coho	Board Member	Ramah Navajo School Board, Inc.

74	Cal	Curley	Field Representative	U.S. Senator Tom Udall
75	Ray	Curley	Board Member	Little Singer School
76	Mike	Dabrieo	Fellow	Santa Clara Pueblo
77	Albert	Deschine	Communications	Navajo Nation Department of Dine Education
78	Roland	Dixon	School Board	Kayenta Schools
79	Kimberly	Dominguez	Assistant Principal	Crytal Boarding School
80	Ralph	Drake	School Board Member	Leupp Schools, Inc.
81	Jim	Dummt	Staff	U.S. Senator Martin Heinrich
82	Jolene	Etsitty	Human Resources	Hunters Point Boarding School
83	Lucy	Garcia		Wingate High School
84	Naomi	Gibson	Tech	Navajo South
85	Lennette	Greyeyes	Adm./Finance	Black Mesa Community School
86	Steve	Guerro	Board Member	Alamo Navajo School Board, Inc.
87	Gloria	Hale-Showalter	Education Line Officer Associate Superintendent	Bureau of Indian Education Navajo
88	Jim	Hastings	Education Line Officer	Bureau of Indian Education
89	Stanley	Herrera	Board Member	Alamo Navajo School Board, Inc.
90	Marita	Hinds	Administrative Assistant	Tesuque Pueblo
91	Jeffery	Hunt	HBS	Business Services Manager
92	Florinda	Jackson	Education Research Analyst	Bureau of Indian Education- Associate Deputy Director Navajo
93	Sally	Joe	Board Member	Kinteel Residential

94	Marion	John	Board Member	Kinfee Residential Campus, Inc.
95	Norman	John II	Board Member	Ch'ooshgai Community School
96	Evangeline	Johnson	Clerk	Bureau of Indian Education Facility Management
97	Amber	Kamazbah Crotty	Tribal Council Delegate	Navajo Nation
98	Heather	Kee	Administrative Assistant	Hunters Point Boarding School, Inc.
99	Kodii	Largo	Administrative Assistant	Associate Deputy Director Navajo
100	Tommy	Leavis	Superintendent	Department of Dine Education
101	Norbert	Leno	Council Member	Pueblo of Tesuque
102	Edison	Leslie	Board Member	T'se'll'Ahi Community School
103	Ruth	Logan	School Board President	Greasewood Springs Community School
104	Esther	Macias	Education Specialist	Bureau of Indian Education Associate Deputy Director
105	Darnell J Maria	Maria	School Board Member	Ranch Navajo School Board
106	John	McIntosh	Associate Superintendent	Bureau of Indian Education
107	Julia	Mitchell	Administrative Assistant	DODE Office of Dine Science Math & Technology
108	Elsie	Monroe		Leupp Schools, Inc.
109	Janice	Montoya	Executive Director/Principal	Hanaadli Community School
110	Richard	Montoya	Board Member	Na-neelzhiin ji olta
111	Harry	Moore	Board Member	Leupp School District

112	Marie	Moore	Grandma	School Students
113	Cynthia	Morres	Director of HR	Shonto Preparatory School
114	Nate	Morrison	Executive Director	Teach for America-New Mexico
115	Jeremy	Oyengue	Youth and Learning Director	Santa Clara Pueblo
116	Loretta	Peny	Bus Tech	BIE SERS CAU?
117	Tamara	Pfeiffer	Superintendent	Alamo Navajo School Board, Inc.
118	Harrison	Plummer	Board Member	Ch'ooshgai Community School
119	Victor C	Puente	Manager	Facility
120	Pat	Reedy	Department of the Interior Office of the Solicitor	Department of the Interior, Office of the Solicitor
121	Karina	Roessel	Navajo Nation Bureau of Indian Education	Tiis Nazbas Community School
122	Gilbert	Roger	Board of Director	Hanaadli Community School
123	Marie	Rose	Principal	Black Mesa Community School
124	Noreen	Sakiestewa	Director	Department of Education-Hopi Tribe
125	Joshua	Sanchez	Field Representative	U.S. Senator Tom Udall
126	Veronica A	Sandoval	Board Member	Na'Neelzhiin Ji Olta, Inc
127	Elrisa	Sells	Navajo Nation Bureau of Indian Education	Mini Farms High School
128	Etta	Shirley	Principal	Little Singer School
129	Delphina	Shunkamolah	Principal (Acting)	Rough Rock Demonstration School
130	Larry	Skeet	Community Member	St. Michaels, Arizona
131	Jared	Slade	Attorney Advisor	Department of the Interior,

				Office of the Solicitor
132	Pearl	Smith	Bus Manager	Shonto Preparatory School
133	Ryan	Swazo-Hinds	Councilman	Pueblo of Tesuque
134	Angelena	Tabaha	Residential Assistant	Hunters Point Boarding School, Inc.
135	Wayne	Taylor Jr.	Executive Director	Hopi Tribe
136	Carlene	Terakhangva	Staff Assistant	Hopi Tribe
137	Kenneth	Toledo	Principal	Na'Neelzliyi
138	Matthow	Tso	Legislative Analyst	Department of Dine Education
139	Marlene G	Tsosi	Principal	Chichiltah Junior High School
140	Philson	Wauneka	Residential Assistant	Hunters Point Boarding School, Inc.
141	Ruth	Wauneka	Board Member	Greasewood Springs Community School
142	Lois	Werito	BOD	Hanaa'dli Community School
143	Kalvin	White	Manager 1	Navajo Nation Department of Dine Education
144	Marie	William	SPED Teacher	Little Singer School
145	Leslie	Williams	School Board Member	Little Singer School
146	Margaret	Willie	Board Member	
147	Ben	Woody Jr	Board Member	Dzilh-na-o-dith-hle School
148	Samuel	Yazzie	School Board Member	Lukachukai Community School
149	Verna	Yazzie	Board Member	Little Singer School
150	Kee	Yazzie-Mann	School Board Member	Shonto Preparatory School

151	Helena	Yellowman	Staff	Bureau of Indian Education, Hunters Point School
152	Rosalind	Zah	Self	Self
153	Peterson	Zah	Grandpa	Self
154	Jolene	Zah	Board Member	Cove Day School
155	Jenevieve	[Last name not provided]	Board Member	Alamo Navajo School Board, Inc.
156	[Name not provided]		School Board	Navajo Nation

Webinar - April 29, 2015

157	Tanya	Amrine	Education Division Director	Ute Mountain Ute Tribe
158	Cecilia	Barber	Librarian	Shiprock Associated Schools
159	Kathie	Bowker	Principal	Cheyenne Eagle Butte School
160	Andrew	Burmeister	Federal Relations	Leech Lake Band of Ojibwe (MN)
161	Sunshine	Carlow	Tribal Education Manager	Standing Rock Sioux Tribe
162	Beverly	Coate	Transcriber	Myers Reporting Service
163	Joseph	DeWilde	Librarian	Many Farms High School
164	Darlene	Dillon	Contract Specialist	Bureau of Indian Affairs
165	Cassandria	Dortch	Analyst	Congressional Research Service
166	Donna	EagleStaffJetty	Act ELO SESA	Bureau of Indian Education
167	Lucy	Fredericks	Director of Indian Education	Department of Public Instruction
168	Sandi	Gilbertson	CSA	Circle of Nations School
169	Leila	Goggeye	Early Childhood Special Education Coordinator	Leech Lake Band of Ojibwe

170	David	Gomez	Attorney	VanAmberg Law Firm
171	Eleanor	Jones	Education Specialist	Bureau of Indian Education
172	Keidrick	June	Facility Supervisor	Tonalea Day School
173	Delmar	Langan	Retired BIA Employee	None
174	Bill	Mehojah	Educator	BestEd
175	Christy	Myers	Court Reporter	Myers Reporting Service
176	Alvin	Myers	President/COO	United Systems
177	Rosanda	Paddock	Administrative Assistant	Ramah Navajo School Board, Inc
178	Robert	Parisien	Education Line Officer	Bureau of Indian Education
179	Patricia	Pena	Student	Haskell Indian Nations University
180	Sarana	Riggs	Parent	None
181	Vincent M	Romero	Education and Training Division Director	Taos Pueblo
182	Jack	Sharma	Principal/Superintendent (acting)	Blackwater Community School
183	Matilda	Smith	Business Technician	BIE-CAU-SPED
184	Andrew	Tah	Retired	Navajo Nation

**Oklahoma City, Oklahoma -
May 1, 2015**

185	Phyllis	Aanzuli	Senior Advisor	The Chickasaw Nation
186	Greg	Anderson	Chief of Staff	Bureau of Indian Education
187	Vickie	Boettger	Ed Tech	Bureau of Indian Education
188	Lynne	Chatfield	Director	Chickasaw Nation

189	Todd	Crawford	Director	The Chickasaw Nation
190	Terri	Darton	President	Wichite and Affiliated Tribes
191	Bruce	Davis	Department Director/Education	Cherokee Nation
192	Tony L	Dearman	Superintendent	Riverside Indian
193	Lydia	Doverall		
194	Ida C.	Doyle	Director of Education	The Osage Nation
195	Catherine	Fatheree	OAEO/BIE	Bureau of Indian Education
196	Vicki	Forrest	Deputy Bureau Director, BIE	Bureau of Indian Education
197	Shane	Haddock	Deputy Director-Johnson O'Malley	Choctaw Nation
198	Lucyann	Harjo	Coordinator IE Norman	Navajo/Norman PS
199	Tracy	Hartman	Director	Eastern Oklahoma Tribal Schools
200	Sharon	Horse	Ed Tech	Bureau of Indian Education
201	Sharon	Hunter	Fed Pro Coordinator	Riverside School Indian
202	Wayne	Johnson	Secretary of Education and Training	Muscogee (Creek) Nation
203	Tryg	Jorgenson	Indian Ed/Tulsa	Tulsa Public Schools
204	William	Nuttle	Program Specialist	Pawnee/Bureau of Indian Education
205	Dolly	Pewitt	Chief Admin Asst.	Seneca-Cayuga
206	Robert	Pielcens	Head Start Director	The Chickasaw Nation
207	Sheri Jean	Plumbtree	High School Teacher	Kickapoo Nation School
208	Chris	Redman	Executive Officer	Chickasaw Nation

209	Yolanda	Reyna	Secretary-Treasurer	Apache Tribe
210	Tonya	Scott	Grant Writer	Muscogee (Creek) Nation
211	Michael	Segroves	Architect	Feldstern Oklahoma Tribal School
212	Brad	Spears	Senior Director CN Superintendent IA	Choctaw
213	David	Sullivan	Director	Anadarko Public Schools Indian Education
214	Kim	Teehee	Director of Government Relations	Cherokee Nation
215	Sheril	Thompson	Indian Ed Coordinator	Creek
216	Jacob	Tsotigh	Indian Education TA Coordinator	University of Oklahoma
217	Debra	Turner	Superintendent	Kickapoo Nation School
218	Charles	Ulrey	Specialist/Tribal Development	Ottawa Tribe of Oklahoma
219	Mark	Vance	Johnson O'Malley Manager	Cherokee Nation
220	Bill	Vann	STEP Program Coordinator	The Chickasaw Nation
221	Phyllis	Warrington	Secretary	Tulsa Public Schools
222	Nancy S	Watson		Muscogee (Creek) Nation
223	Danny	Wells	Executive Officer	The Chickasaw Nation
224	Sydna	Yellowfish	Edmond Schools	Edmond Schools
225	Edwin	[Last name not provided]	Governor	

**Albuquerque, New Mexico -
May 1, 2015**

226	Victoria	Abeita	Walk in	
227	Fernando	Abeita	Council tribal	Pubelo of Isleta
228	Stephanie	Abeita	Laguna	Laguna
229	Joe	Abeyta	Councilman Santa Clara	Santa Clara
230	Howie	Agnino	President	Ohkay Owingeh Board of Education
231	Sherry	Allison	President	BIE-Southwestern Indian Polytechnic Institute
232	Marvis	Aragon	President	Acoma Pueblo Board of Education
233	Alex	Bazan	Field Representative	U.S. Rep. Lujan Grisham
234	Joseph	Casados	Constituent Liaison	U.S. Rep Ben Ray Lujan
235	Antonio	Chewiwi	1st Lt. Gov	Pueblo of Isleta
236	Darlene	Chinaira	Education Director	Pueblo of Zia
237	Carolyn	Coho	Ramah Navajo School Board	Ramah Navajo School Board, Inc.
238	Harley	Coriz	Director Education	Santo Domingo Tribe
239	Janelle	Frederick	Policy Coordinator	All Pueblo Council
240	Joe	Garcia	Head Council	Ohkay Owingeh
241	Zachary	Garcia	Council Representative	Pueblo of Laguna
242	Steve	Guerro	Board Member	Alamo Navajo School Board, Inc.
243	Ken	Hucero	Field Representative	US Senator Heinrich
244	Michael	Jojola	IES Gov. Board	Isleta Gov. Board
245	Geraldine	Jojola	Executive Director	Pueblo of Isleta Department of Education

246	Patty	Jojola	Director of Procurement	Pueblo of Isleta
247	Ben	Lejan	1st LT Governor	Ohkay Owingeh
248	Darrell J	Maria	Board Member	Ramah Navajo School Board, Inc.
249	David	Martinez Jr.	President	Ramah Navajo School Board, Inc.
250	William	Muniz	National Council	Jicarilla Apache Nation
251	Erik	Olson	Chief Financial Officer	Santa Fe Indian School
252	Dr. Tamarah	Pfeifer	Consultant	Alamo Navajo School Board, Inc.
253	David	Pino	Governor	Pueblo of Zia
254	Beverly L	Piro	Administrative Assistant	Pueblo of Isleta Department of Education
255	Michael	Romero	Education & Training Division Director	Taos Pueblo
256	Joey	Sanchez	Assistant Director of Education	Pueblo of Santa Ana
257	Barbara S.	Sanchez	Council member	Pueblo of Isleta
258	Josh	Sanchez	Field Representative	U.S. Senator Tom Udall
259	Patricia	Sandoval	Director Planning and Evaluation	Santa Fe Indian School
260	Lisa	Smith	Academic Coach Johnson O'Malley	Pueblo of Isleta Department of Education Johnson O'Malley
261	Casey	Sovo	New Mexico South Education Program Administrator	Bureau of Indian Education New Mexico South
262	Francis	Tafoy	Education	Santa Clara Pueblo

263	Paul	Torres	Governor	Pueblo of Isleta
264	Claudia J.	Vigil	Education Officer	
265	Rick	Vigil	Pueblo of Tasoque	Tasoque Community School
266	Fred S	Volb Sr	Governor	Pueblo of Acoma
267	Nolan	Wainwright	Intern	Michelle Lajan Grisham
268	Elmer	Yazzie	RNSB School Board Member	Ramah Navajo School Board, Inc.
269	Elaine	Zuni	Senator Buyer	Pueblo of Isleta
270	Carmela	[Last name not provided]	Administrative Assistant	Pueblo of Isleta