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Havasupai Elementary School Work Plan

Updated June 2024

Background and Overview

In February 2024, the Department of the Interior, Bureau of Indian Education (DOI, BIE) conducted and submitted an [initial assessment](#) of the educational programming at the Havasupai Elementary School (HES) to determine programmatic compliance with 13 regulatory requirements in direct response to requirements of the Stephen C. Remand Settlement (Stephen C., et al. v. Bureau of Indian Education, et al., No. 3:17-cv-08004-SPL (D. Ariz.)) (hereinafter “Settlement Agreement”). Those regulations include 25 C.F.R. §§ 36.11, 36.20, 36.21, 36.22, 36.23, 36.30, 36.31, 36.40, 36.41, 36.42, 36.43, 36.50, 36.51.

Under section A of the [Settlement Agreement](#), the DOI, BIE was responsible for contracting with a Facilitator with experience in fostering communications within indigenous communities. The Facilitator’s responsibility will be to facilitate communications among the Tribe, community, and HES, and to support the community engagement necessary for BIE to meet its obligations under the 13 regulations at issue.

Under Section B of the [Settlement Agreement](#), the DOI, BIE was responsible for the creation of a Compliance Specialist Position. The responsibilities of the Compliance Specialist include overseeing the implementation of new or existing measures at HES that are related to compliance with the 13 regulations at issue (Section B-1). Additionally, the Compliance Specialist is responsible for issuing an initial assessment of BIE’s compliance with the 13 regulations within three months of the date on which the Compliance Officer assumed the position (Section B-2). The [initial assessment](#) was completed on February 12, 2024, and is available at <https://www.bie.edu/landing-page/havasupai-elementary-school>.

Under section B-2-b, of the Settlement agreement, within thirty (30) days of the initial assessment, the Compliance Specialist will draft a written work plan for complying with the 13 regulations at issue. The completion date for the initial written work plan was March 13, 2024. The work plan in effect will be updated on an ongoing basis and posted online every 90 day from the date the first work plan is posted. The first work plan was posted on April 12, 2024. The updated work plan will be posted on July 11, 2024.

Havasupai Elementary School 90-Day Work Plan

This initial 90-day work plan intends to foster transparency and accountability by setting forth action steps, identifying a timeline, BIE staff responsible, and resources. In addition, this plan identifies monitoring activities and success criteria. Progress and necessary expenditures outside of the existing HES budget will be updated on an ongoing basis and posted on the BIE website every 90 days. In tandem with the initial assessment, the work plan will provide details of the scope of work BIE to ensure compliance with the 13 regulations. The work plan will be revisited and updated every 90 days. The next 90-day work plan will be published in October 2024. Our vision is to go beyond compliance to ensure that each student experiences a high-quality education and is prepared for high school, college, career, and community life.

To inquire about this work plan please contact Ms. Frances Chretien at frances.chretien@bie.edu or (771) 233-7521.

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25 CFR §36.11 Standard II - Administrative Requirements

Legal Citation: 25 CFR §36.11(a)(2): *Staffing*. Each school shall, at a minimum, meet the following requirements:

(a)(2) Multi-grade classrooms that cross grade-level boundaries (e.g., K-1, 3-4, etc.) shall use the maximum of the lower grade. In grades K-8, grades shall be consolidated to meet the teacher ratios listed above.

Monitoring (who, when, how):

- The Compliance Specialist will review the Recruitment/Retention plan in the Plan4learning portal after June 30, 2024
- The Compliance Specialist will check the Native American Student Information System (NASIS) rosters to ensure the school is following student-to-staffing ratios along with class walkthroughs and hard copy rosters in classrooms monthly during site visits.

Success Criteria:

HES retains the staff necessary, so all multi-grade classes do not exceed the teacher ratios listed in 25 CFR §36.11(a)(1) as evidenced through class rosters in NASIS and hard copy and recruitment retention plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	Grade 1-2 teacher started in February 2024 and Kindergarten class was split into a self-contained class that meets class size ratios. NASIS training completed May 29, 2024	Current class ratios are as follows: Kindergarten-12 students Grades 1-2—16 students Grades 3-4—17 students Grades 5-6—12 students Grades 7-8—24 students (two teachers)
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Change Required/Key Issue	Staffing: K-2 classroom exceeds the kindergarten ratio of 20:1. Native American Student Information System (NASIS) is not up to date with current teachers of record for students.
BIE Staff Responsible	Principal, NASIS Specialist, Education Program Administrator
Resources	Sample BIE Recruitment/Retention Plan The following educator preparation programs may be sources for recruitment: Northern Arizona University Institute of Native Serving Educators University of Arizona Indigenous Teacher Education Program

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Reduce class size to ensure a kindergarten student-to-teacher ratio of 20:1 is met by hiring a teacher for grades 1-2.	Completed: Grade 1-2 teacher hired in March 2024
2. Review and update the recruitment/retention policy. The updated policy should be uploaded into the BIE One Plan. Include elements of the settlement agreement. Include work with Teach for America and AmeriCorps to recruit, orient, and retain staff at Havasupai Elementary School (HES).	June 30, 2024
3. Work with the Facilitator to recruit/retain local tribal community members to create a path for sustainability of staffing. Include this work in the recruitment/retention policy.	Ongoing School Year (SY) 2024-2025
4. Ensure that class rosters in NASIS are up-to-date and align with teacher hard copies of class rosters to produce documentation of the student-to-teacher ratio.	Ongoing (SY) 2024-2025
5. Records training and NASIS training for Secretary and admin.	Before the start of SY 2024-2025

Legal Citation: 25 CFR §36.11(a)(4): *Staffing*. Each school shall, at a minimum, meet the following requirements:

(a)(4) Schools exceeding these specific staffing ratios for over 30 consecutive days during one school year shall submit a justification for a request for a waiver to the Director, through the Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, which may be approved for a period not to exceed one school year and for the following reasons:

(i) Additional classroom space is not available for establishing another class; or

(ii) The school, Agency, Area, and Office of Indian Education Programs Applicant Supply File has been exhausted and the required teacher position cannot be filled. However, efforts to fill the vacancy shall be continued.

Monitoring (who, when, how):

- The Compliance Specialist will review the draft to ensure it meets the regulation requirements before submitting it to the Director through the EPA.
- School will copy the Compliance Specialist in the request for a SharePoint.

Success Criteria:

HES will submit a waiver for the School year 2023-2024 and has a draft of the request on a school SharePoint site and file at the school.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	A request for a waiver was submitted to the BIE Director on May 15, 2024. The principal reported that the SharePoint site was established on June 5, 2024
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Change Required/Key Issue	HES has not submitted a justification for a request for a staffing waiver to be approved for School Year 2023-2024.
BIE Staff Responsible	Principal, Secretary, Education Program Administrator
Resources	Link to request a SharePoint . The following educator preparation programs may be sources for recruitment: Northern Arizona University Institute of Native Serving Educators University of Arizona Indigenous Teacher Education Program

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Draft a waiver to the director citing the reasons for exceeding staffing ratios.	Completed May 2024
2. Submit waiver to the BIE Director through the EPA for the 2023/2024 School year	Completed May 2024
3. The draft should be maintained in school records.	Ongoing
4. Request and establish a school SharePoint site.	June 28, 2024

Legal Citation: 25 CFR §36.11(a)(5): *Staffing*. Each school shall, at a minimum, meet the following requirements:

(a)(5) Each school shall provide, in the absence of a regular teacher, a certified substitute teacher who meets the State substitute teacher qualifications. In the event that such a substitute is not available, coverage will be provided by a school employee designated by the school supervisor. A class cannot have as a teacher an employee without teaching credentials for more than 20 school days during any one school year.

Monitoring (who, when, how):

- Compliance Specialist will monitor tracking documentation for utilization and accuracy during monthly site visits.

Success Criteria:

HES will employ an intermittent certified substitute teacher and utilize a tracker for class coverage as evidence of compliance.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	Two substitute teacher positions were added to the org chart and posted on USAJobs to recruit applicants. The position has closed, and one applicant was selected. The principal reported that the tracker for SY 2024-2025 was completed on June 9, 2024
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Change Required/Key Issue	HES does not have substitute teachers. There is also no system for documenting class coverage in the regular teacher's absence.
BIE Staff Responsible	Principal, Secretary, Education Program Administrator, Business technician
Resources	There may be local community members who are interested in obtaining their certification to become a substitute teacher. This link is to the Arizona substitute teacher qualifications and process for obtaining a certificate, https://www.azd.gov/educator-certification/substitute-prek-12

Action Steps	Timeline
1. Develop a system for tracking substitute teacher class coverage, including how the class was covered or divided. This system should be documented in a procedural document and uploaded to the school's SharePoint site.	August 2024
2. Review substitute teacher applications. Ensure applicants meet qualifications for state substitute certification	Completed May 2024

Legal Citation: 25 CFR §36.11(b):

(b) Written school enrollment and attendance policies. Each school shall have written school enrollment and attendance policies in compliance with and/or consistent with 25 CFR 31, Federal Schools for Indians, the statutes of the State, and tribal education ordinances.

Monitoring (who, when, how):

- Compliance specialist will review completed enrollment and attendance policies in the school handbook for compliance with 25 CFR 31
- Compliance specialist will check teacher record books and attendance register reports during monthly site visits.

Success Criteria:

HES will have written enrollment and attendance policies that are followed, monitored, and documented as evidenced by accurate attendance in NASIS and teacher record books.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	<p>Attendance and enrollment policies are written but not being implemented as outlined in the student handbook.</p> <p>HES does not track and maintain attendance accurately.</p>
BIE Staff Responsible	Principal, Secretary, Teachers
Resources	<p>ADD-BOS Safety Specialist School-assigned NASIS specialist</p> <p>Webinar Recording Increasing Attendance and Engagement for American Indian and Alaska Native Students WEEAC at WestEd hosted a national webinar focused on ways that educators have improved attendance for Native students in culturally responsive ways. https://weeac.wested.org/resource/chronic-absence-session-4-increasing-attendance-and-engagement-for-american-indian-and-alaska-native-students/</p> <p>Classroom Attendance Calculator https://www.attendanceworks.org/resources/data-tools/classroom-attendance-calculator/ Attendance Works has developed a Classroom Attendance Calculator for educators to help determine whether a student’s absences place him or her in the satisfactory, at-risk or chronic absence categories. The calculator includes a step-by-step guide to fill in the spreadsheet, and a worksheet that allows educators to assess the steps they are taking now and what more they can do to reduce chronic absence.</p> <p>Guide to Using the Attendance Playbook: Smart Solutions for Reducing Student Absenteeism Post-Pandemic https://www.attendanceworks.org/resources/attendance-playbook/ The guide helps educators target sports to groups of students who need</p>

additional help to overcome barriers to attendance and engagement. It offers general ideas and tools, as well as charts and checklists, to determine what interventions to try with students and their families.

Action Steps	Timeline
1. Review and rewrite attendance and enrollment policies and related forms/documents such as enrollment forms.	August 2024
2. Develop a system and expectations for tracking attendance.	August 2024
3. Teachers keep a hard copy of attendance and verify with the weekly attendance register report from NASIS by signing the report.	Ongoing SY 2024-2025
4. Attendance Register reports will be on file in the office as evidence of accurate attendance.	Ongoing SY 2024-2025

Legal Citation: 25 CFR §36.11(c)

(c) Immunization. School children shall be immunized in accordance with the regulations and requirements of the state in which they attend school or standards of the Indian Health Service.

Monitoring (who, when, how):

- Compliance Specialist will check student immunizations in NASIS and/or review the school’s Indian Student Equalization Program (ISEP) monitoring report to ensure all students comply with immunization requirements.

Success Criteria:

HES will have updated student immunizations that meet the regulations and requirements of the state or Indian Health Service (IHS) for every student. In addition, documentation of parent/guardian contact for students missing immunizations will be evidenced through NASIS, student records, and parent contact logs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES collects student immunization records; however, many records indicate missing vaccines. The school needs a system for monitoring and following up with students who are missing vaccines.
BIE Staff Responsible	Principal, counselor, BOS behavior health coordinator, Registrar/Secretary, Associate Deputy Director BOS management analyst
Resources	Public Health Nurse Supai Health Station may be a partner for health-related resources and learning opportunities for students, families, and staff. Staff may benefit from professional learning about Arizona’s school immunization guidance https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/immunization/school-childcare/nofollow/school-childcare-immunization-guide.pdf

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Update the existing MOU with Indian Health Services (IHS) to include the public health nurse(s) to assist with monitoring immunizations.	December 2024
2. Establish quarterly meetings with IHS to discuss student health issues.	December 2024
3. Create and utilize templates for parent notification when missing immunizations.	October 2024
4. Upload parent notification template to the School's SharePoint site	May 2025

25 CFR §36.20 Standard V - Minimum Academic Programs/ School Calendar

Legal Citation: 25 CFR §36.20(b): The educational program shall include multi-culture and multi-ethnic dimensions designed to enable students to function effectively in a pluralistic society.

Monitoring (who, when, how):

- Compliance Specialist will review lesson plans during monthly site visits.
- Compliance specialist will look for evidence of multi-culture dimensions through classroom walkthroughs.
- Compliance specialist will monitor documentation of training and Professional Learning Communities (PLCs)

Success Criteria:

HES will have evidence of multi-culture dimensions as evidenced through lesson plans, classroom observations, and policies.

Funding /Expenditures necessary:

A potential funding expense may be for Staff training on Multicultural dimensions.

Progress:	
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Change Required/Key Issue	HES has no explicit expectation or accountability for this requirement.
BIE Staff Responsible	Principal, Teachers, counselors, ADD-BOS Culture and Language Specialist
Resources	<p>Culturally Responsive Instruction for Native American Students https://csaa.wested.org/spotlights/culturally-responsive-instruction-for-native-american-students/ Professional learning series on culturally responsive instruction for American Indian students. This series provides a framework for instruction that emphasizes experiential, active, and student-centered learning. This framework assists all teachers in working with Native students but is also very relevant to developing an understanding that supports approaching Native subject matter. CRESTT, UCLA, WestEd.</p>

Action Steps	Timeline
1. Acquire resources and training for teachers and administration on multi-cultural dimensions	August 2024
2. Establish a lesson plan template with a requirement for multi-culture and multi-ethnic dimensions	August 2024
3. Create time for PLCs for professional development and support for teachers.	Ongoing SY 2024-2025
4. Develop a system for monitoring through lesson plan reviews and classroom observations and walkthroughs.	By August 2024 then ongoing SY 2024-2025

5. Examine school policies and practices to ensure an equitable and empowering school culture and social structure.	Through Comprehensive needs assessment process 2025
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Legal Citation: 25 CFR §36.20(b)(1): The school's language arts program shall assess the English and native language abilities of its students and provide instruction that teaches and/or maintains both the English and the primary native language of the school population. Programs shall meet local tribal approval.

Monitoring (who, when, how):

- Compliance Specialist will review curriculum documents upon development by HES.
- Compliance specialist will review the program and documentation of tribal approval.

Success Criteria:

HES will have a language arts program that assesses English and Native Language abilities. It will also teach or maintain English, and the Native Language with Havasupai Tribal approval as evidenced through assessment, curriculum map, tribe-approved program, and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not implement a language arts program that includes assessment or instruction of the primary native language.
BIE Staff Responsible	Principal, Culture teacher, ADD Culture and language specialist, Facilitator
Resources	<p>Publicly available Resources related to Culturally responsive regulations.</p> <p>American Indian Indigenous Teacher Education Conference https://nau.edu/college-education/annual-indigenous-teacher-education-conference/ Northern Arizona University’s College of Education will host the 14th American Indian/Indigenous Teacher Education Conference (AIITEC) on June 21-22, 2024. The sessions offer knowledge, practices, networking, and practical teaching solutions. Participants will learn strategies they can use immediately across all grade levels and subjects.</p>

Action Steps	Timeline
1. With Facilitator assistance, collaborate with the Culture and language teacher and tribe to develop a native language assessment for each grade level.	August 2024
2. Work to build a curriculum map for language and culture in each grade level.	December 2024
3. Develop a curriculum with a scope and sequence, materials, and assessment for each grade level.	May 2025
4. Submit the proposed program to the tribe for approval	July 2025

5. Provide professional development to the culture teacher on topics such as lesson planning and language assessment development.	October 2024
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Legal Citation: 25 CFR §36.20(b)(2): The school program shall include aspects of the native culture in *all* curriculum areas. Content shall meet local tribal approval.

Monitoring (who, when, how):

- Compliance Specialist will check professional development training documentation materials for culturally relevant instruction including but not limited to agendas, sign-in sheets, and presentation materials.
- Compliance Specialist will review documentation of orders and resources available on campus for the inclusion of native culture in all curriculum areas.
- Compliance Specialist will review lesson plans and conduct classroom walkthroughs to verify the inclusion of Native American culture in all curriculum areas.

Success Criteria:

HES will have an instructional program that includes Native American culture in all curriculum areas as evidenced by developed content, lesson plans, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for Literature and resources on Native American culture and Culturally relevant instruction training.

Progress:	
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Change Required/Key Issue	HES does not expect the inclusion of native culture in the curriculum.
BIE Staff Responsible	Principal, Culture and Language teacher, ADD-BOS Culture and Language Specialist, Facilitator
Resources	<p>Native Knowledge 360 https://americanindian.si.edu/nk360/professional-development/upcoming-webinars These live and interactive programs introduce educators to NK360° and its extensive resources. Webinars are designed to support education professionals in learning approaches to incorporate more complete narratives about Native American histories, cultures, and contemporary lives into their teaching.</p> <p>Lesson Plans Native Knowledge 360 is a site for teaching and learning curated by the Smithsonian’s National Museum of the American Indian.</p> <p>Blog Supporting Native American Students Through Culturally Relevant Education REL West https://ies.ed.gov/ncee/rel/Products/Region/west/Blog/107352</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Acquire training for all staff on culturally relevant instruction and culturally enhanced curriculum.	August 2024
2. Work with the facilitator to acquire Havasupai cultural resources from the tribe and community.	Ongoing SY 2024-2025
3. Order Literature and resources for Native American culture.	December 2024
4. Submit all content developed to the tribe for approval.	September 1
5. Implement Culturally enhanced STEAM curriculum and activities into classroom instruction	October 2024

Legal Citation: 25 CFR §36.20(b)(3): The school program shall assess the learning styles of its students and provide instruction based upon that assessment. The method for assessing learning styles shall be determined at the local level.

Monitoring (who, when, how):

- Compliance Specialist will review lesson plans for evidence of instruction based on a learning style assessment.
- Compliance specialist will review data from assessments from each class to ensure the assessment was administered.

Success Criteria:

HES will have data on student learning styles that drive instructional activities as evidenced through lesson plans, classroom walkthroughs, and data binders/files.

Funding /Expenditures necessary:

A potential funding expense may be for the purchase of an electronic learning style assessment.

Progress:	
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Change Required/Key Issue	HES has not conducted a learning style assessment to inform instruction.
BIE Staff Responsible	Principal, teachers, ADD BOS curriculum and Instruction Specialist
Resources	

Action Steps	Timeline
1. Select an electronic learning style assessment for each grade band that will compile class data and generate activities.	July 2024
2. Acquire resources and training for teachers by content area and grade level for different learning styles.	July 2024
3. Provide PLC time for teachers to gain support	Ongoing SY 2024-2025
4. Develop a lesson plan template that includes documentation of learning style.	August 2024

Legal Citation: 25 CFR §36.20(c): All intraschool programs (e.g., library, instructional labs, physical education, music, etc.) which are directly related to or affect student instruction shall provide services from the beginning of the school term through the final class period at the close of the school term.

Monitoring (who, when, how):

- Compliance specialist will review the school’s master schedule and documentation that the school is meeting deadlines for contracting based on the developed timeline.

Success Criteria:

HES will establish and follow a process to have all contracts for services in place before the start of the school year as evidenced by a procurement list, contracts, and a master schedule.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES has offered Native language and culture classes from the beginning of the school term, but this is the only special/intraschool program that has been offered since the beginning of the term. Library, physical education, and Social Emotional Learning classes began providing services later in the school year.
BIE Staff Responsible	HES Assigned contracting officer representative (COR), HES assigned COR(s), Principal, Business technician, Budget analyst
Resources	

Action Steps	Timeline
1. Review contracts and subscriptions through UDO reports by looking at when they expire and if they have an option year.	April 2025
2. Develop a procurement list that identifies the needs of the school.	May 1, 2025
3. Schedule a meeting with the leaders and teams for BIE contracting, finance, and ADD to develop a timeline and actions to have services in place before the start of the school year.	May 15, 2025
4. Create a master schedule that includes all intraschool programs from the beginning of the school term through the close of the school term.	August 2025

25 CFR §36.21 Standard VI - Kindergarten Instructional Program

Legal Citation: 25 CFR §36.21(a) - The curriculum for kindergarten shall provide children with experiences which emphasize language development, native language where necessary as determined by 25 CFR 39.11(g), and performance of the requirements in paragraph (b) of this section.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans and conduct walk-throughs during monthly site visits for language and Native language requirements.
- Compliance specialist will review walkthrough documentation.

Success Criteria:

HES will implement a curriculum emphasizing language development and Havasupai's native language as evidenced through lesson plans and classroom observations.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES has selected and acquired the Savvas Curriculum for Kindergarten through 8th grades.
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Change Required/Key Issue	HES has not fully implemented the kindergarten curriculum due to multi-grade classrooms. HES has not incorporated the Native language into the curriculum.
BIE Staff Responsible	Kindergarten teacher, Principal, Facilitator, ADD-BOS curriculum and instruction specialist, ADD-BOS Culture, and language specialist
Resources	Developmentally Appropriate Practice in Kindergarten: Observation Guide https://www.wested.org/resources/developmentally-appropriate-practice-in-kindergarten-observation-guide/ The guide provides the following sections to use when observing for and identifying evidence of developmentally appropriate practice: Safe and Supportive Environments, Responsive Developmental Relationships, Family Engagement, Curriculum and Instruction, Motor Development, Literacy and Language Development.

Action Steps	Timeline
1. Kindergarten teacher will implement an appropriate grade-level kindergarten curriculum.	SY 24-25
2. Kindergarten teacher will write weekly lesson plans that align with the selected curriculum	SY 2024-2025
3. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	SY 2024-2025
4. Facilitator will assist the school in finding resources for the Havasupai Language from the tribe and community.	Ongoing SY 2024-2025

Legal Citation: 25 CFR §36.21(b)(2-4)

- (b) A kindergarten instructional program shall include but not be limited to:
- (2) Exploration of the environment (number, space and time relationships, natural science).
- (3) Psychomotor and socialization development.
- (4) Development of imaginative and creative tendencies.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

The HES kindergarten instructional program will include Exploration of the environment psychomotor and socialization development, or development of imaginative and creative tendencies as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	The school does have a curriculum (Savvas) for kindergarten that includes exploration of the environment, psychomotor and socialization development, and development of imaginative and creative tendencies.
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Change Required/Key Issue	HES does not follow a curriculum that includes exploration of the environment, psychomotor and socialization development, or development of imaginative and creative tendencies.
BIE Staff Responsible	Kindergarten teacher, Principal, ADD-BOS curriculum and instruction specialist
Resources	<p>Publicly available Resources related to Culturally responsive regulations.</p> <p>Joyful Literacy with Young Children https://www.wested.org/joyful-reading-writing-and-creative-expression-with-young-children/ Joyful Literacy is an evidence-based, culturally and linguistically sustaining, and whole-child approach to support young children’s literacy development. The approach integrates socio-emotional learning strategies and creative expression activities with evidence-based early literacy practices. When engaged with these practices, children develop language, literacy, and critical thinking skills while also learning how literacy can be creative, evoke feelings of joy, and cultivate a sense of belonging in school.</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Kindergarten teacher will implement an appropriate grade-level kindergarten curriculum.	Ongoing SY 2024-2025
2. Kindergarten teacher will write weekly lesson plans that align with the selected curriculum	Ongoing SY 2024-2025
3. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
4. Support and training will be provided through PLCs and Savvas (curriculum) professional development.	Ongoing SY 2024-2025

Legal Citation: 25 CFR §36.21(b)(5)

(b) A kindergarten instructional program shall include but not be limited to: (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES kindergarten instructional program will include health education as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not implement an instructional program that includes Health Education.
BIE Staff Responsible	School contracted PE teacher, Principal, BOS behavior health coordinator, ADD BOS management analyst
Resources	K-2 Personal Health Series https://classroom.kidshealth.org/classroom/index.jsp?Grade=pk&Section=personal This site provides teacher’s guides and lesson plans to help younger students learn how they can improve their own health.

Action Steps	Timeline
1. Health Education will be provided by the contracted Physical Education Teacher.	Ongoing SY 2024-2025
2. The PE teacher will write weekly lesson plans to document when health education is being provided.	Ongoing SY 2024-2025
3. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
4. Meet with IHS to gather information on health education they can provide in addition/ collaboration with the PE teacher and School. Update existing MOU to include IHS as a resource for health education.	December 2024

25 CFR §36.22 - Standard VII - Elementary Instructional Program

Legal Citation: §36.22(a)(2)

- (a) The elementary instruction programs, grades one through six, shall include but need not be limited to:
- (2) Mathematics.
 - (3) Social studies.
 - (4) Sciences.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES Elementary instructional program will include Math, Social Studies, and Science as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES has selected and acquired the Savvas Curriculum for Kindergarten through 8th grades.
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Change Required/Key Issue	HES does include Math, Social Studies, and Science on the master schedule, however, the school has not used a curriculum or set an expectation for these areas to be included in lesson plans.
BIE Staff Responsible	Elementary teachers, Principal, ADD-BOS curriculum and instruction specialist
Resources	

Action Steps	Timeline
1. Master Schedule will be reviewed to ensure all subjects are included and have sufficient instructional time.	Ongoing SY 2024-2025
2. The elementary teachers will implement an appropriate grade-level curriculum for each subject area.	Ongoing SY 2024-2025
3. Elementary teachers will write weekly lesson plans that align with the selected curriculum.	Ongoing SY 2024-2025
4. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
5. Support and training will be provided through PLCs and SAVVAS (curriculum) professional development.	Ongoing SY 2024-2025

Legal Citation: §36.22(a)(5)

(a) The elementary instruction programs, grades one through six, shall include but need not be limited to: (5) Fine Arts.

Monitoring (who, when, how):

- Compliance specialist will review the budget with the school and documentation on contracting a fine arts teacher through the BIE One plan and school SharePoint.

Success Criteria:

HES will have an instructional program that includes Fine Arts as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:

Possible funding source- Title IV-A well-rounded schools

A potential funding expense may be for funding for a contracted fine arts teacher.

Progress:	
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Change Required/Key Issue	HES does not offer a Fine Arts program.
BIE Staff Responsible	Principal, Education Program Administrator, school-assigned contracting officer, Facilitator
Resources	Institute of American Indian Arts This tribal college may be a source for teachers or guest teachers.

Action Steps	Timeline
1. Review the school budget for the school to fund a contract for a fine arts teacher.	June 30, 2024
2. Research the cost of bringing a contractor in one day a week.	June 30, 2024
3. Work with the facilitator to partner with the tribe and community to find resources/people to teach cultural arts.	Ongoing SY 2024-2025

Legal Citation: §36.22(b)(1-2, 4)

(b) Each school shall integrate the following content areas into its curriculum:

- (1) Career awareness
- (2) Environmental and safety education
- (4) Metric education

Monitoring (who, when, how):

- Compliance specialist will review lesson documentation through the school’s SharePoint site in November 2024.
- Compliance specialist will review counselor documentation during monthly site visits.

Success Criteria:

HES will integrate career awareness, Environmental and safety education, and metric education into the school’s curriculum and instructional program as evidenced through curriculum maps and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not provide core programming to integrate these content areas into the curriculum.
BIE Staff Responsible	Principal, Elementary teachers, School counselor, ADD BOS curriculum, and Instruction Specialist
Resources	Micro-Course Indigenous Pathways in Planning for College, Career, and Community Life https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/

Action Steps	Timeline
1. Review the Savvas curriculum for these elements and document lessons that integrate career awareness, Environmental and safety education, and metric education.	October 2024
2. Counselor will facilitate and track career lessons.	Ongoing SY 2024-2025
3. Counselor will create lesson plans for career lessons.	Ongoing SY 2024-2025

Legal Citation: §36.22(b)(3)

(b) Each school shall integrate the following content areas into its curriculum: (3) Health education (includes requirements contained in 24 Stat. 69),

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES elementary instructional program will include health education as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not integrate health education into its curriculum
BIE Staff Responsible	School contracted PE teacher, principal, BOS behavior health coordinator, ADD BOS management analyst
Resources	<p><u>KidsHealth in the Classroom</u> KidsHealth in the Classroom offers educators free health-related lesson plans. Each Teacher's Guide includes discussion questions, classroom activities and extensions, printable handouts, quizzes, and answer keys all aligned to National Health Education Standards.</p> <p>Arizona Health Education Standards and Resources https://www.azed.gov/pe/health-education</p>

Action Steps	Timeline
1. Health Education will be provided by the contracted Physical Education Teacher.	Ongoing SY 2024-2025
2. PE teacher will write weekly lesson plans to document when health education is being provided.	Ongoing SY 2024-2025
3. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
4. Meet with IHS to gather information on health education they can provide in addition/ collaboration with the PE teacher and School. Update existing MOU to include IHS as a resource for health education.	December 2024

Legal Citation: §36.22(b)(5)

(b) Each school shall integrate the following content areas into its curriculum: (5) Computer literacy.

Monitoring (who, when, how):

- Compliance specialist will review the computer inventory and school-wide budget in the SharePoint site and Plan4learning portal.
- Compliance Specialist will review the school’s lesson plan template to ensure this requirement is included.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES will integrate computer literacy into the curriculum as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for computers for each classroom

Progress:	
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Change Required/Key Issue	HES does not provide core programming to integrate this content area into the curriculum.
BIE Staff Responsible	Principal, IT, Elementary teachers
Resources	

Action Steps	Timeline
1. Conduct an Inventory of working computers on campus	June 21, 2024
2. Work on the School-wide budget to acquire the technology needed to teach computer literacy	June 30, 2024
3. Add computer literacy as a lesson plan component	August 2024
4. Elementary teachers will write weekly lesson plans to document when computer literacy is being provided.	Ongoing SY 2024-2025
5. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025

25 CFR §36.23, Standard VIII - Junior High/Middle School Instructional Program

Legal Citation: §36.23(a):

(a) The instructional program shall reflect the school's philosophy and the needs of the students and the community. It shall be part of a progressive development that begins in the elementary program which precedes it and continues to the secondary program which follows.

Monitoring (who, when, how):

- Compliance specialist will Review the school’s comprehensive needs assessment in plan4learning in July 2024.
- Compliance specialist will review lesson plans during monthly site visits and curriculum maps on the school’s SharePoint site once they are complete.

Success Criteria:

HES will implement an instructional program that reflects the school’s philosophy and the community's needs as evidenced by data collected during the comprehensive needs assessment. The instructional program shall be a part of progressive development as evidenced through curriculum mapping and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	Teachers are set up to participate in on-going NLC (Network Learning Communities) with other BIE grade level teachers.
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Change Required/Key Issue	HES does not currently offer an instructional program that is a part of progressive development for all instructional areas.
BIE Staff Responsible	Principal, teachers, Facilitator, 7/8 th grade teacher, ADD BOS curriculum, and Instruction specialist.
Resources	

Action Steps	Timeline
1. Conduct a comprehensive needs assessment using school data and solicit input from the tribe, community, parents/guardians, students, and staff.	June 30, 2024
2. Review the school’s philosophy to ensure that it is reflected in its instructional program as part of the comprehensive needs assessment.	June 30, 2024
3. Teachers will utilize the selected curriculums for Reading/language arts, math, science, and social studies to ensure a progressive program	Ongoing School Year 2024-2025
4. School will participate in the curriculum mapping project led by the ADD-BOS curriculum specialist.	June 30, 2025
5. Curriculum maps will be posted on the school SharePoint site and utilized in instructional planning.	June 30, 2025

Legal Citation: §36.23(b)(2-4):

(b) The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

- (2) Social studies.
- (3) Mathematics.
- (4) Science.

One unit shall be required of each student every year.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES Junior High instructional program will include Math, Social Studies, and Science as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES has selected and acquired the Savvas Curriculum for Kindergarten through 8th grades.
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Change Required/Key Issue	HES does include Math, Social Studies, and Science on the master schedule, however, the school has not used a curriculum or set an expectation for these areas to be included in lesson plans.
BIE Staff Responsible	Junior High teachers, Principal, ADD-BOS curriculum and instruction specialist, Facilitator
Resources	

Action Steps	Timeline
1. Master Schedule will be reviewed to ensure all subjects are included and have sufficient instructional time.	Ongoing SY 2024-2025
2. 7/8th grade teachers will implement an appropriate grade-level curriculum for each subject area.	Ongoing SY 2024-2025
3. 7th/8th grade teachers will write weekly lesson plans that align with the selected curriculum.	Ongoing SY 2024-2025
4. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
5. Support and training will be provided through PLCs and Savvas (Curriculum) professional development.	Ongoing SY 2024-2025

Legal Citation: §36.23(b)(5):

(b) The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

(5) Fine arts and practical arts. One unit each shall be required of each student in the junior high/middle school instructional program.

Monitoring (who, when, how):

- Compliance specialist will review the budget with the school and documentation on contracting a fine arts teacher through the BIE One plan and school SharePoint.

Success Criteria:

HES will have an instructional program that includes Fine Arts as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:

Possible funding source- Title IV-A well-rounded schools

A potential funding expense may be for funding for a contracted fine arts teacher.

Progress:	
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Change Required/Key Issue	HES does not offer a curriculum that includes instructional content in the areas of fine arts and practical arts.
BIE Staff Responsible	Principal, Education Program Administrator, School assigned contracting officer, Facilitator
Resources	These institutions are sources for Native fine arts and practical arts teachers. Institute of American Indian Arts , Northern Arizona University Institute of Native Serving Educators , University of Arizona Indigenous Teacher Education Program

Action Steps	Timeline
1. Review the school budget for the school to fund a contract for a fine arts teacher.	June 30, 2024
2. Research the cost of bringing a contractor in one day a week.	June 30, 2024
3. Work with the facilitator to partner with the tribe and community to find resources/people to teach cultural arts.	Ongoing SY 2024-2025

Legal Citation: §36.23(b)(6):

(b) The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

(6) Computer literacy. One unit shall be required of each student in the junior high/middle school instructional program.

Monitoring (who, when, how):

- Compliance specialist will review the computer inventory and school-wide budget in the SharePoint site and Plan4learning portal.
- Compliance Specialist will review the school’s lesson plan template to ensure this requirement is included.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

HES will integrate computer literacy into the curriculum as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for computers for each classroom.

Progress:	
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Change Required/Key Issue	HES does offer computer literacy as required instructional content.
BIE Staff Responsible	Principal, IT, Junior High teachers
Resources	

Action Steps	Timeline
1. Conduct an Inventory of working computers on campus	June 21, 2024
2. Work on the School-wide budget to acquire the technology needed to teach computer literacy	June 30, 2024
3. Add computer literacy as a lesson plan component	August 2024
4. Elementary teachers will write weekly lesson plans to document when computer literacy is being provided.	Ongoing SY 2024-2025
5. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025

Legal Citation: §36.23(c)(1-4):

(c) The following content areas shall be integrated into the curriculum.

- (1) Career exploration and orientation.
- (2) Environmental and safety education.
- (3) Metric education.
- (4) Consumer economics (including personal finances).

Monitoring (who, when, how):

- Compliance specialist will review lesson documentation through the school’s SharePoint site in November 2024.
- Compliance specialist will review counselor documentation during monthly site visits.

Success Criteria:

HES will integrate career exploration and orientation, environmental and safety education, metric education, and consumer economics into the school’s curriculum and instructional program as evidenced through curriculum maps and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not provide core programming to integrate these content areas into the curriculum.
BIE Staff Responsible	Principal, Junior high teachers, School counselor, ADD-BOS curriculum and instruction specialist, Facilitator
Resources	

Action Steps	Timeline
1. Review the Savvas curriculum for these elements and document lessons that integrate career exploration and orientation, environmental and safety education, metric education, and consumer economics.	October 2024
2. Counselor will facilitate and track career lessons.	Ongoing SY 2024-2025
3. Counselor will create lesson plans for career lessons.	Ongoing SY 2024-2025
4. Work with the facilitator to collaborate with the community and tribe on career exploration.	Ongoing SY 2024-2025

Legal Citation: §36.23(c)(5):

(c) The following content areas shall be integrated into the curriculum.
 (5) Health education (includes meeting the requirements contained in 24 Stat. 69).

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during monthly site visits.

Success Criteria:

The HES junior high instructional program will include health education as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not integrate health education into the curriculum.
BIE Staff Responsible	School contracted PE teacher, HES principal, BOS behavior health coordinator, ADD BOS management analyst
Resources	

Action Steps	Timeline
1. Health Education will be provided by the contracted Physical Education Teacher.	Ongoing SY 2024-2025
2. PE teacher will write weekly lesson plans to document when health education is being provided.	Ongoing SY 2024-2025
3. Administrators will conduct walkthroughs and review lesson plans to ensure curriculum implementation.	Ongoing SY 2024-2025
4. Meet with IHS to gather information on health education they can provide in addition/ collaboration with the PE teacher and School. Update existing MOU to include IHS as a resource for health education.	December 2024

25 CFR §36.30, Standard X - Grading Requirements

Legal Citation: §36.30(a)

(a) Each school shall implement a uniform grading system which assesses a student's mastery of the prescribed objectives of the courses of study undertaken. The mastery of prescribed course objectives shall be the primary measure of academic attainment for reporting student grades on report cards.

Monitoring (who, when, how):

- Compliance specialist will review the handbook grading policy to ensure it meets the requirements of this regulation upon completion of any revisions.
- Compliance specialist will review the lesson plan template and lesson plans during monthly site visits to ensure prescribed objectives are being taught.

Success Criteria:

HES will implement a uniform grading policy that assesses mastery of prescribed objectives as evidenced through written policy in the student handbook, lesson plans, scope and sequence, and grades in NASIS.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES is not implementing a uniform grading system that assesses a student's mastery of prescribed objectives. Teachers are not doing lesson plans nor is there an expectation of teaching to prescribed objectives.
BIE Staff Responsible	Principal, teachers, ADD-BOS curriculum, and Instruction Specialist.
Resources	

Action Steps	Timeline
1. Review the current student and teacher handbook to identify the current uniform grading policy. Revise as necessary	August 2024
2. Develop a lesson plan template that identifies grade-level objectives.	August 2024
3. Complete the scope and sequence for the school-selected curriculum to identify prescribed objectives.	December 2024
4. Develop/access/utilize common assessments to measure mastery of prescribed lesson/unit objectives.	Ongoing SY 2024-2025
5. Administrator will monitor NASIS to ensure the grading policy is followed.	Ongoing SY 2024-2025

Legal Citation: §36.30(b)

(b) The information derived from student instructional evaluations shall be shared with the student and with the parents and shall be used to give teachers and students direction for subsequent learning activities.

Monitoring (who, when, how):

- Compliance Specialist will review the teacher handbook to ensure the policy meets the requirements of this regulation once it is complete.
- Compliance specialist will review classroom files during monthly site visits.
- Compliance specialist will monitor professional development by reviewing sign-in sheets, agendas, and PD calendars.

Success Criteria:

HES will use information derived from instructional evaluations to make data-based decisions when planning instructional activities as evidenced through data binders, lesson reflection, and lesson plans. Evaluation information will be shared with parents and students as evidenced through conferences and progress reports.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES has started training on data-based decision-making in the classroom, but there has been no expectation for staff to use data and communicate evaluations with students and parents.
BIE Staff Responsible	Principal, Teachers, ADD-BOS curriculum and instruction specialist
Resources	

Action Steps	Timeline
1. Review the teacher handbook for expectations on sharing evaluations with students and parents	August 2024
2. A copy of assessments will be kept in student files in the classroom.	Ongoing SY 2024-2025
3. Evaluation information will be shared during Fall and winter parent-teacher conferences.	Ongoing SY 2024-2025
4. Assessment information will also be shared in progress reports sent home during mid-term.	Ongoing SY 2024-2025
5. Teacher training on formative and summative assessment and using data to drive instruction.	May 2025

Legal Citation: §36.30(d) (1-3)

(d) Each school shall issue a report card to parents of students who are under the age of eighteen (18) and to students eighteen (18) years of age and older on a regular basis, but not less than four (4) times yearly. The report card shall include, but not be limited to, the following sections:

- (1) Recommendations and probable promotion status;
- (2) Appropriate signatures and request for return of report cards; and
- (3) Student attendance record.

Monitoring (who, when, how):

- Compliance Specialist will review the report card policy in the student and teacher handbook to ensure it meets the requirements of this regulation once revisions are made.
- Compliance Specialist will review student records during monthly site visits to ensure report cards meet the requirements of this regulation.

Success Criteria:

HES will issue report cards four times a year that contain key information identified in this regulation. Report cards with signatures or requests for signatures will be kept in students' cumulative records.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES is issuing report cards to parents/guardians; however, the report card does not always contain the information required under this requirement.
BIE Staff Responsible	HES principal, teachers, secretary
Resources	

Action Steps	Timeline
1. Review and update the student and teacher handbook to ensure that the report card procedure and expectations meet the requirements of this regulation.	August 2024
2. Teachers will retain copies of all report cards with a request for parent signature to be part of the student's school cumulative record.	Ongoing SY 2024-2025
3. Teachers will review report cards and request parent/guardian signatures during parent-teacher conferences.	During scheduled PT conferences
4. Report cards will be sent home with students with a request for students to return report cards with signatures to add to students' school cumulative records when the parent does not attend parent-	Ongoing quarterly SY 2024-2025

teacher conferences or when parent-teacher conferences are not held.	
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25 CFR §36.31, Standard XI - Student Promotion Requirements

Legal Citation: 25 CFR § 36.31 (a-b):

Each school shall establish and implement a promotion policy which shall be submitted to and approved by the local school board and Agency Superintendent for Education or Area Education Programs Administrator, as appropriate.

- (a) Each grade level or equivalent shall have a minimum criterion for student promotion based primarily on measurable mastery of the instructional objectives
- (b) Criterion-referenced tests that evaluate student skills shall be utilized for measuring the mastery of instructional objectives. The evaluation results shall form the basis for the promotion of each student.

Monitoring (who, when, how):

- Compliance specialist will review the promotion policy to ensure it meets the requirements of this regulation upon completion of review and edits.
- Compliance Specialist will review documentation of approval from the School Board and Education Program Administrator.

Success Criteria:

HES will establish a promotion policy that meets the requirements of this regulation as evidenced through teacher and student handbooks and have documents approval by the school board and education program administrator.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not have an active local school board; having a school board in place is key to coming into compliance with this regulation. HES has a promotion policy, but it is not being followed or implemented.
BIE Staff Responsible	Principal, Education Program Administrator
Resources	

Action Steps	Timeline
1. Review the promotion policy in the teacher/student handbooks to ensure it meets the requirements of this regulation.	August 2024
2. Submit to the school board and Education Program Administrator for approval.	August 2024 (if the school board is active currently)

25 CFR §36.40, Standard XIII - Library/Media program

Legal Citation: §36.40(a)

(a) Each school shall provide a library/media program which shall, as a minimum, meet the applicable state and/or regional standards, but shall not be limited to these, and shall include the following:

Monitoring (who, when, how):

- Compliance Specialist will review the master schedule to ensure library services are scheduled for all students upon completion.
- Compliance Specialist will conduct walkthroughs during monthly site visits to observe library services are occurring according to the master schedule.

Success Criteria:

HES will provide a library/media program that meets all requirements as evidenced by a hired/contracted librarian on staff, library time in the master schedule, and documented walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	An elementary teacher has been hired. She is a certified librarian and has been providing these services. A contracted librarian will begin servicing the school once per week on 5/9/24
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Change Required/Key Issue	HES has a library but does not offer a library/media program.
BIE Staff Responsible	Principal, Librarian
Resources	

Action Steps	Timeline
1. Hire/contract a librarian to provide library services to all students	Hired May 9, 2024
2. Include the library/media program in the school’s master schedule.	August 2024

Legal Citation: §36.40(a)(1)

(1) A written set of instructional and service objectives shall be established that is integrated and consistent with the school's educational goals and philosophy. The librarian or educational media specialist, with students and staff, shall set objectives based on assessed academic and residential needs. The program and services will be evaluated yearly by the principal and the librarian or educational media specialist to determine the degree to which all objectives have been met.

Monitoring (who, when, how):

- Compliance specialist will review the BIE One plan once complete in the Plan4learning portal.
- Compliance specialist will review documentation from the school board meetings to ensure the philosophy has been reviewed in conjunction with the school board.
- Compliance Specialist will review data from the questionnaires and the written set of instructional and service objectives.

Success Criteria:

HES will offer a library/media program with a written set of instructional and service objectives that is consistent with the school's need and philosophy as evidenced by the BIE One Plan, data from questionnaires and documented objectives that drive the program.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	A school librarian was hired and started on May 9, 2024
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Change Required/Key Issue	HES does not have a written set of instructional and service objectives. The school has not had a librarian or educational media specialist.
BIE Staff Responsible	Principal, Librarian
Resources	

Action Steps	Timeline
1. Complete the BIE One plan to determine needs, goals, and a program plan for the school.	June 30, 2024
2. Review the philosophy in conjunction with the school board.	August 2024
3. Librarian will solicit feedback from staff and students through a questionnaire.	September 2024
4. Librarian will develop objectives based on the BIE Oneplan, philosophy, and student/staff input.	October 2024

Legal Citation: §36.40(a)(2)(i)(A-C)

(2) A written policy for the selection of materials and equipment shall be developed by a library committee in collaboration with the librarian and be approved by the school board. The collection of materials shall include as a minimum the following:

(i) A collection of books suitable for the range of student abilities and interests being served in the following ADM ratios.

(A) Elementary K-6, 15 books per student

(B) Middle 7-8, 12 books per student

(C) Secondary 9-12, 10 books per student

It is required that materials pertaining to Indian Tribes and/or Alaskan Natives be integrated within this basic collection.

(ii) Eight (8) to 12 percent of the basic collection must be composed of reference books, currently relevant and in a state of good physical condition, for practical use. Single copies of the principal textbooks used to complement instruction shall be in the collection, but textbooks cannot be counted toward this standard.

(iii) A periodical collection, suitable for the range of student abilities and interests being served, consisting of one (1) periodical for every ten (10) students, shall be maintained. Schools of over 200 will have a base collection of 20 periodicals.

(iv) A professional collection for the school staff shall be developed and maintained by the librarian in cooperation with a faculty committee.

(v) A variety of audio-visual materials, suitable for the range of instruction being provided, of at least 750 items or five (5) items for each student, whichever is larger, and inclusive of materials located in the classrooms shall be maintained. This category includes some of each of the following: Tactile objects, globes, models, maps, films, filmstrips, microforms, slides, audio and video tapes, recordings, transparencies and graphics, and the equipment to use all of these. Multiple items within a specific set of materials will be counted as separate items.

Monitoring (who, when, how):

- Compliance specialist will review all documentation and meeting sign-in sheets for the library committee during monthly site visits.
- Compliance specialist will review the approved written policy uploaded on the School's OneDrive account.

Success Criteria:

HES will have an established library committee with a school board-approved written policy for the selection of materials as evidenced through meeting agendas and sign-in sheets, and approved policy loaded to the school's OneDrive.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not have a written policy for the selection of materials and equipment. There is a large collection of books but there is no organization or catalog of materials.
BIE Staff Responsible	Principal, Librarian, teachers, Facilitator
Resources	

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Establish a library committee composed of a librarian, teacher representative, administrator, parent, student, and school board member.	October 31, 2024
2. Develop a written policy for the selection of materials and equipment that meet the regulations in this regulation.	January 31, 2024
3. Send the policy to the school board for approval.	February 1, 2024
4. With the help of the facilitator, research and seek materials about the Havasupai tribe.	Ongoing SY 2024-2025

Legal Citation: §36.40(a)(3)

(3) There shall be a library media center serviced by a librarian. Schools with fewer than 200 students are encouraged, wherever feasible, to cooperate in sharing librarian resources. Schools within an Agency and/or Area may cooperatively share the costs and services of a librarian who shall facilitate sharing of the combined available resources among the cooperating schools in accordance with the following ratios:

School Enrollment (ADM)

Up to 100 - 1/5 time librarian

101-200 - 1/5 time librarian and 1/2 time library aide or 20 hours of library activity

201-400 - 1 full-time librarian or 2/5 time librarian provided the school has a full-time library aide

401 + - 1 full-time librarian and a full-time library aide

Monitoring (who, when, how):

- Compliance Specialist will monitor library services through monthly site visits, the master schedule, and financial calls with contract reviews.

Success Criteria:

HES will provide library services by a certified librarian a minimum of 1 day a week as evidenced by the master schedule, library service plan, and current school contracts.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES has procured a federal contract with O'Ready, LLC under PO: 140A2323P0800, to fly in a Librarian one time a week (1/5 librarian) to HES to provide Library Services, in accordance with 36.40(a)(3). The school also hired a teacher who is a certified librarian. She assists with library services when needed.
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Change Required/Key Issue	HES does not have a library/media center serviced by a librarian. The population is under 100, so the school would need a 1/5-time librarian.
BIE Staff Responsible	Principal
Resources	

Action Steps	Timeline
1. The school-contracted librarian started on May 9, 2024.	May 9, 2024

Legal Citation: §36.40(a)(4)

(4) All libraries must conduct an annual inventory of available books, materials, and equipment in accordance with the acquisitions and selection policies

Monitoring (who, when, how):

- Compliance specialist will check inventories upon completion.
- Compliance specialist will participate in financial review calls to monitor purchasing.

Success Criteria:

HES will conduct an annual inventory using a system and keep all inventory records in school files.

Funding /Expenditures necessary:

A potential funding expense may be for the purchase of Follett Destiny for the school library as an automated check-in/check-out and inventory system.

Progress:	Follett Destiny contacted for the price
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Change Required/Key Issue	HES does not have a librarian, nor have they conducted an annual inventory of available books, materials, and equipment
BIE Staff Responsible	Librarian, principal, and business technician
Resources	

Action Steps	Timeline
1. Librarian will begin the process of conducting a manual inventory of all equipment, materials, and books	SY 2024-2025
2. Conduct a needs assessment and budget review to fund a library's needs.	June 30, 2024
3. Purchase an automated library checkout system that has an inventory system	May 2025

25 CFR §36.41, Standard XIV - Textbooks

Legal Citation: §36.41(a)

(a) Each school shall establish a textbook review committee composed of teachers, parents, and students, and school board members. Appointment to the textbook review committee shall be subject to school board approval.

Monitoring (who, when, how):

- Compliance Specialist will review the approved list for the textbook review committee and any documents related to the selection on the schools' SharePoint site or during monthly site visits.

Success Criteria:

HES will have an established and approved textbook review committee composed of teachers, parents, students, and school board members as evidenced through meeting sign-ins and agendas.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	School board members have been identified as of April 4, 2024.
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Change Required/Key Issue	HES has not established a textbook review committee. The school board is not in place to appoint and approve members of the textbook review committee.
BIE Staff Responsible	Principal, teachers, and the Facilitator.
Resources	

Action Steps	Timeline
1. Establish expectations for the textbook review committee with teachers.	August 2024
2. Teachers will nominate students be a part of the textbook review committee.	September 2024
3. Work with the facilitator to enlist parents to be a part of the textbook review committee	August-October 2024
4. Facilitator will assist with the school board's appointment of members for the textbook review committee.	November 2024
5. Submit the committee to the school board for approval	

Legal Citation: §36.41(b)

(b) The textbook review committee shall establish a procedure and criteria for the annual review of textbooks and other materials used to complement instruction. The criteria shall include, but not be limited to, the following:

- (1) The textbooks content shall meet the course objectives which are within the adopted school curriculum.
- (2) The textbooks shall, as much as possible, reflect cultures accurately.
- (3) The textbooks shall be current, in good physical condition, and varied in reading levels.

Monitoring (who, when, how):

- Compliance Specialist will review the meeting and consultation documentation during monthly site visits or on the school SharePoint site.
- Compliance specialist will review the procedure and criteria for the annual review of textbooks to ensure it meets the requirements of this regulation on the school SharePoint site.

Success Criteria:

HES will have a textbook review committee with an established procedure and criteria for the annual review of textbooks as evidenced by a written procedure and rubrics that are used in their annual review.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES does not have a textbook review committee as outlined in (a), thus, subsequent requirements cannot be met.
BIE Staff Responsible	Principal, teachers, and Facilitator
Resources	

Action Steps	Timeline
1. Textbook review committee will consult with ADD BOS Curriculum Specialist on West Ed curriculum review resources	January 2024
2. Establish/Adopt a procedure and criteria for annual review of textbooks	January 31, 2024
3. Facilitator will assist with the review to ensure the textbooks meet the needs of the Havasupai tribal community.	Ongoing SY 2024-2025

Legal Citation: §36.41(c)

(c) Each school shall equitably distribute instructional materials to all classrooms. Each school shall inventory all property and equipment annually prior to requisitioning additional materials. Copies of the inventory shall be kept on file by the school staff.

Monitoring (who, when, how):

- Compliance Specialist will review classroom inventories and master inventory on SharePoint and in school files during monthly site visits at the beginning of the year and the end of the school year.

Success Criteria:

HES will equitably distribute materials and inventory all property and equipment annually as evidenced through classroom inventory documents on file at the school and on the school’s SharePoint site.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	Classrooms currently have textbook materials for Math, Science and Social Studies.
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Change Required/Key Issue	Each classroom has instructional materials and textbooks for the SAVVAS Reading/ELA curriculum. The classrooms did not have Math, Science, or Social Studies textbooks. There is no inventory for property and equipment on file.
BIE Staff Responsible	Principal, teachers, secretary
Resources	

Action Steps	Timeline
1. Teachers will inventory all textbooks, property, and equipment in their assigned classroom.	August 2024
2. Inventories will be kept on file in the main office and on the school SharePoint site.	Ongoing SY 2024-2025
3. Teachers will update inventory when checking out at the end of the school year.	May 2025 and ongoing
4. A master school inventory will be maintained on a spreadsheet that tracks the distribution of instructional materials to ensure equitable distribution.	Ongoing SY 2024-2025

25 CFR §36.42, Standard XV - Counseling Services

Legal Citation: §36.42

Each school shall offer student counseling services concerned with physical, social, emotional, intellectual, and vocational growth for each individual. Counseling services shall be included in a school-wide assessment program.

Monitoring (who, when, how):

- Compliance specialist will review documentation of training that counselor has attended on the BIE SharePoint site or during monthly site visits.

Success Criteria:

HES will offer a counseling program that offers services concerned with physical, social, emotional, intellectual, and vocational growth for each student as evidenced through counseling logs. The HES counseling program will be included in the school-wide assessment program as evidenced through training logs and the school testing plan.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	The school counselor did take over as testing coordinator for the Spring 2024 BIE assessment. She developed a testing schedule, training, and ordered materials.
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Change Required/Key Issue	HES has a school counselor that started in November 2023. The counselor does offer services concerned with physical, social, emotional, intellectual, and vocational growth for all students. The counselor has not been a part of the school-wide assessment program because it has not been fully developed or implemented.
BIE Staff Responsible	Principal and counselor
Resources	BIE Chief Academic office

Action Steps	Timeline
1. School counselor will attend all assessment training offered by the BIE and keep a log of training.	Ongoing SY 2025-2025
2. Counselor and principal will work together to review/create a testing plan for HES.	November 2024

Legal Citation: §36.42(a)(1, 3-6)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
- (1) Each Spring, schools shall conduct testing for grades 4, 8, and 12 using a current version of a standardized academic achievement test based upon the national assessment standards designed to assess higher order thinking skills. All schools shall keep a current record, with the Office of Indian Education Programs, of the test the school administers each Spring and the testing dates.
 - (2) Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.
 - (3) Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.
 - (4) Parents/guardians shall be informed of their children's assessment results and provided with an explanation and interpretation to ensure adequate understanding of the results.
 - (5) Each school's instructional program shall establish an ongoing student academic assessment program to ensure that defined assessment procedures are in place. The program shall include regular training in basic assessment procedures and routines for all teachers and other staff involved in student assessment.
- (6) Each Agency and Area, as appropriate, shall report the results of each school's formal Spring tests to the Office of Indian Education Programs by August 1 of each year. Summative information from performance-based and authentic assessments shall be reported at the same time.

Monitoring (who, when, how):

- Compliance specialist will review the school-wide assessment plan and calendar to ensure it meets all requirements of this regulation on the school SharePoint site.
- Compliance specialist will review letters to parents and parent-teacher conference sign-in sheets during monthly site visits.

Success Criteria:

HES will plan and implement an assessment program that meets all requirements of this regulation as evidenced by a school-wide assessment plan and calendar.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	The school counselor did take over as testing coordinator for the Spring 2024 BIE assessment. She developed a testing schedule, training, and ordered materials.
Change Required/Key Issue	HES school-wide assessment program is not fully implemented or followed. There is no documented school-wide assessment plan. The school does administer assessments, but they do not meet all the requirements of this regulation.
BIE Staff Responsible	Principal and counselor
Resources	BIE Chief Academic office

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. School principal and counselor will work together to review the testing document and develop a school-wide assessment plan that meets the requirements of this regulation.	November 2024
3. School will Send home a copy of the test assessment scores with a letter explaining the results.	TBD when the scores arrive
4. Test scores will be reviewed with parents during the first parent-teacher conference.	End of 1st quarter October 23rd
5. Review current school testing protocols for potential revision to ensure the reliability and validity of test scores.	End of September 2024
6. School principal and counselor will develop a calendar inclusive of all testing dates for the school year. This calendar will be part of the assessment plan.	September 2024

Legal Citation: §36.42(b)(3)(i)

- (b) Each counseling program shall provide the following:
- (3) The counseling program shall contain the following:
 - (i) A written referral procedure;
 - (ii) Counseling techniques and documentation procedures to provide for the career, academic, social, and personal needs of the students which are based on the cultural beliefs and values of the students being served;
 - (v) Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.
 - (iv) Confidentiality and security of counseling records for each student; and
 - (v) Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.
 - (v) Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests. Additionally, counselors will assist high school students in selecting courses which satisfy the school's and the state's graduation requirements and the student's academic and career plan. Further, seniors will be given aid in completing registration and/or financial assistance applications for either vocational or academic post-secondary institutions.
 - (v) Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests. Additionally, counselors will assist high school students in selecting courses which satisfy the school's and the state's graduation requirements and the student's academic and career plan. Further, seniors will be given aid in completing registration and/or financial assistance applications for either vocational or academic post-secondary institutions.

Monitoring (who, when, how):

- Compliance Specialist will review all documents, resources, tracking, and inventories on SharePoint or during monthly site visits.
- Compliance specialist will ensure regulations are being met and files are secure through walkthroughs during monthly site visits.

Success Criteria:

HES will have a counseling program that contains all regulation requirements as evidenced by written procedural documents, cultural resources, tracking systems, and secure student records.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	HES has a counseling program but does not have documented procedures, processes, or clear expectations.
BIE Staff Responsible	School counselor, Principal, ADD BOS behavior Health specialist, and Facilitator.
Resources	<p>Micro-Course Indigenous Pathways in Planning for College, Career, and Community Life https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/</p> <p>Brief Increasing American Indian and Alaska Native High School Graduation Rates: Strategies and Recommendations for Local Education Agency Leaders in the Western States</p>

	<p>https://weeac.wested.org/resource/increasing-american-indian-and-alaska-native-high-school-graduation-rates-strategies-and-recommendations-for-local-education-agency-leaders-in-the-western-states/</p> <p>Brief Missing More Than School: Reducing Chronic Absence for American Indian and Alaska Native Students https://weeac.wested.org/missing-more-than-school-reducing-chronic-absence-for-american-indian-and-alaska-native-students/</p> <p>Brief Discipline Equity for American Indian and Alaska Native Students: Recommendations for District Leaders https://weeac.wested.org/resource/discipline-equity-for-american-indian-and-alaska-native-students-recommendations-for-district-leaders/</p>
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Action Steps	Timeline
1. School counselor will work with the ADD BOS Behavior Health specialist to develop a written referral procedure and related documents.	December 2024
2. School counselor EPAP (Employee Performance appraisal plan) will be adjusted to include the requirements of this regulation.	August 2024
3. With the assistance of the Facilitator, the counseling program will seek resources from the tribe and community to develop/acquire resources to learn the cultural beliefs and values of the students.	Ongoing SY 2024-2025
4. School counselor will develop documentation systems for tracking student services and activities.	September 2024
5. School principal will work with the counseling program to assess the program's needs to acquire items such as file cabinets.	September 2024

25 CFR §36.43, Standard XVI - Student Activities

Legal Citation: §36.43

All schools shall provide and maintain a well-balanced student activities program based on assessment of both student and program needs. Each activity program shall help develop leadership abilities and provide opportunities for student participation but not be limited to activities that include special interest clubs, physical activities, student government, and cultural affairs. The activity program shall be an integral part of the overall educational program.

(a) All student activities shall be required to have qualified sponsors and be approved by the school supervisor, and the school board shall approve the overall activity plan. A qualified sponsor is a professional staff member of the school that is given responsibility to provide guidance or supervision for student activities.

(b) A plan of student activity operations shall be submitted, by each activity at the beginning of each school year, to the school supervisor. The plan will include the purpose, structure, coordination, and planned types of fund-raising activities.

(h) The school shall provide for the safety and welfare of students participating in school-sponsored activities.

(i) Each sponsor of a student activity will be given orientation and training covering the responsibilities of a sponsor by the school supervisor.

Monitoring (who, when, how):

- Compliance Specialist will review all documents, data from questionnaires, and sign-in sheets on the school's SharePoint site.
- During monthly site visits, the compliance specialist will conduct a walkthrough of activities and review documentation on file at the school.

Success Criteria:

HES will provide and maintain a well-balanced student activities program based on an assessment of both student and program needs as evidenced through questionnaires, approved activity plans, and orientation documentation.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES did begin activities in March 2024. The stipend list for activity sponsors had already been approved for SY 2024-2025.
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Change Required/Key Issue	HES does not provide or maintain a well-balanced student activities program. No student government groups, special interest clubs, or physical activity programs exist. There is no plan, orientation, or training.
BIE Staff Responsible	Principal, teachers, and Facilitator
Resources	

Action Steps and Timeline on next page.

Action Steps	Timeline
1. Develop and administer an activities interest questionnaire for students.	September 2024
2. Create a student activity plan, handbook and calendar, and calendar that identifies sponsors, expectations, and operational guidelines.	August 2024
3. With the assistance of the Facilitator, identify community and tribal resources for cultural activities.	Ongoing SY 2024
4. Submit the plan for approval to the school board	September 2024
5. Principal will give Orientation and training for all staff that will be an activity sponsor with a sign-in acknowledging responsibilities.	September 2024

25 CFR §36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities

Legal Citation: §36.51(a)

(a) The Office of Indian Education Programs shall monitor and evaluate the conformance of each Agency or Area, as appropriate, and its schools with the requirements of this part. In addition, it shall annually conduct onsite monitoring at one-third of the Agencies and Areas, thereby monitoring onsite each Agency and/or Area at least once every three (3) years. Within 45 days of the onsite visits, the Director shall issue to each Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, a written report summarizing the monitoring findings and ordering, as necessary, required actions to correct noted deficiencies.

Monitoring (who, when, how):

- Compliance officer will work as a part of the CPO to schedule, plan, and facilitate onsite monitoring for school year 2025-2026.
- Compliance Specialist will work with the CPO to review reports and ensure they are delivered to the school within 30 days of the monitoring.

Success Criteria:

Bureau of Indian Education through the Chief Performance Office will conduct onsite monitoring of Havasupai Elementary School every 3 years to monitor and evaluate the requirements of this part.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Change Required/Key Issue	The Director’s office has not monitored and evaluated the conformance of HES within the requirement of this part, fully.
BIE Staff Responsible	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
Resources	

Action Steps	Timeline
1. Chief Performance Office for BIE will facilitate Onsite monitoring for Havasupai Elementary School and continue monitoring every three years.	School Year 2025-2026
2. School and Education Resource Center will receive a final report and technical assistance plan 30 days after the completion of the monitoring visit.	School Year 2025-2026

Legal Citation: §36.51(b)

(b) Each Agency or Area, as appropriate, in conjunction with its school board shall monitor and evaluate the conformance of its school with the requirements of this part through an annual onsite evaluation involving one-third of the schools annually, thereby monitoring onsite each school at least once every three (3) years. Within 30 days of the onsite visit, the Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, shall issue to the local school supervisor and local school board a written report summarizing the findings and ordering, as necessary, required actions to correct noted deficiencies.

Monitoring (who, when, how):

- Compliance officer will work as a part of the CPO to schedule, plan, and facilitate onsite monitoring for school year 2025-2026.
- Compliance Specialist will work with the CPO to review reports and ensure they are delivered to the school within 30 days of the monitoring.

Success Criteria:

Bureau of Indian Education through the Chief Performance Office will conduct onsite monitoring, in conjunction with its school board and the area education programs administrator, of Havasupai Elementary School every 3 years to monitor and evaluate the requirements of this part.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	HES School Board members have been selected. Training from BIE is scheduled tentatively for July 10 th .
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Change Required/Key Issue	There is no active School board for HES. The Education Resource Center and the ADD BOS office do not monitor and evaluate the conformance of HES through an annual onsite evaluation.
BIE Staff Responsible	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
Resources	

Action Steps	Timeline
1. ADD-BOS office will be a part of the monitoring process facilitated by the CPO office.	School Year 2025-2026
2. School board will be invited to participate in the monitoring process through interviews and the exit meeting.	School Year 2025-2026
3. School will receive a written final report and technical assistance plan within 30 days of the completion of the monitoring.	School Year 2025-2026

Legal Citation: §36.51(e)

(e) The Office of Indian Education Programs, Agency Superintendent for Education, or Area Education Programs Administrator, as appropriate, shall annually conduct a summative evaluation to assess the degree to which each Bureau educational policy and administrative procedure assists or hinders schools in complying with the requirements of this part. This will include, but not be limited to, the following actions:

- (1) Evaluate current policies and practices not related to this part and the effects thereof on the amount of time and resources required which otherwise would be available for these standards;
- (2) Modify any policies and practices which interfere with or compromise a school's capability to achieve and maintain these standards;
- (3) Invite non-Federal agencies to evaluate the effects current policies and procedures have had on complying with the requirements of this part; and
- (4) Submit annually to the Director a copy of the summative evaluation.

Monitoring (who, when, how):

- Compliance Specialist will work as a part of the team conducting the summative evaluation and collect data through meeting notes, attendance, rubric, and evaluation tools used.

Success Criteria:

BIE will conduct an annual summative evaluation in partnership with WestEd or another non-federal agency to assess the degree to which educational policies and procedures assist or hinder schools in complying with the requirements of this part and make changes based on findings as evidenced through a summative evaluation report.

Funding /Expenditures necessary:

A potential funding expense may be for a contract with a non-federal agency

Progress:	
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Change Required/Key Issue	BIE has not conducted a summative evaluation to assess the degree to which BIE’s educational policy and administrative procedures assist or hinder schools in complying with this part.
BIE Staff Responsible	BOS-ADD, Education Program Administrator, Principal
Resources	

Action Steps	Timeline
1. BIE will work with WestEd or another non-federal agency to assist the EPA or school Principal in conducting a summative evaluation of current BIE policies and practices to determine effectiveness.	Obtain contract by October 2024
2. BIE will work with West Ed or another non-federal agency to assist the EPA or school principal in modifying any policies or practices which interfere with or compromise the school’s capability to achieve.	August 2025
3. BIE will submit a copy of the evaluation to the director.	September 2025

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25 CFR §36.11 Standard II - Administrative Requirements

25 CFR §36.11, Standard II for Administrative Requirements falls under Subpart B - Educational Management. There are seven (7) core requirements under §36.11.

The seven core requirements of § 36.11 are:

1. §36.11(a)(1) - Student to Staffing Ratio in Self-Contained Classrooms
2. §36.11(a)(2) - Student to Staffing Ratio in Multi-Grade Classrooms
3. §36.11(a)(3) - Daily Teaching Load in Departmentalized Classrooms
4. §36.11(a)(4) - Waiver for Exceeding the Student to Staff Ratio
5. §36.11(a)(5) - Substitute Teacher or Non-Certified Teacher Requirements
6. §36.11(b) - School Enrollment and Attendance Policy
7. §36.11(c) - Immunization

The initial assessment determined that HES has a zero percent compliance rate for the §36.11 regulation and is not in compliance with the following five requirements:

§36.11(a)(2) - Student to Staffing Ratio in Multi-Grade Classrooms

§36.11(a)(4) - Waiver for Exceeding the Student to Staff Ratio

§36.11(a)(5) - Substitute Teacher or Non-Certified Teacher Requirements

§36.11(b) - School Enrollment and Attendance Policy

§36.11(c) - Immunization

25 CFR §36.20 Standard V - Minimum Academic Programs/ School Calendar

25 CFR §36.20, Standard V for Minimum Academic Programs/ School Calendar falls under Subpart C - Minimum Program of Instruction. There are seven (7) core requirements under §36.20.

The seven core requirements of §36.20 are:

1. §36.20(a) - Early Dismissal Procedures for Counting School Day
2. §36.20(b) - Multi-culture and multi-ethnic dimensions within the educational program

3. §36.20(b)(1) - Assessment of the English & Native Language ability of students
4. §36.20(b)(2) - Native culture in all curriculum areas
5. §36.20(b)(3) - Assessment of student learning styles to inform instruction
6. §36.20(b)(4) - Minimum field trip per child per year
7. §36.20(c) - Intraschool programs from beginning to end of School Year

The initial assessment determined that HES is at a 28.57% compliance rate for the §36.20 regulation and is not in compliance with the following five requirements:

§36.20(b) - Multi-culture and multi-ethnic dimensions within the educational program

§36.20(b)(1) - Assessment of the English & Native Language ability of students

§36.20(b)(2) - Native culture in all curriculum areas

§36.20(b)(3) - Assessment of student learning styles to inform instruction

§36.20(c) - Intraschool programs from beginning to end of School Year

25 CFR §36.21 Standard VI - Kindergarten Instructional Program

25 CFR §36.21, Standard VI - Kindergarten Instructional Program falls under Subpart C - Minimum Program of Instruction. There were seven (7) core requirements assessed under §36.21.

The seven core requirements of §36.21 are:

1. §36.21(a) - Kindergarten Curriculum emphasize language development, native language, and requirements of Paragraph b
2. §36.21(a) - Kindergarten Curriculum assists children in developing positive feelings towards self
3. §36.21(b)(1) - Kindergarten Instructional Program includes: Language (observing, listening, speaking).
4. §36.21(b)(2) - Kindergarten Instructional Program includes: (2) Exploration of the environment (number, space and time relationships, natural science).
5. §36.21(b)(3) - Kindergarten Instructional Program includes: (3) Psychomotor and socialization development.
6. §36.21(b)(4) - Kindergarten Instruction Program includes: (4) Development of imaginative and creative tendencies.

7. §36.21(b)(5) - - Kindergarten Instruction Program includes: (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69.

The initial assessment determined that HES has a 28.57% compliance rate for the §36.21 regulation and is not in compliance with the following five requirements:

§36.21(a) - Kindergarten Curriculum emphasize language development, native language, and requirements of Paragraph b

§36.21(b)(2) - Kindergarten Instructional Program includes: (2) Exploration of the environment (number, space and time relationships, natural science).

§36.21(b)(3) - Kindergarten Instructional Program includes: (3) Psychomotor and socialization development.

§36.21(b)(4) - Kindergarten Instruction Program includes: (4) Development of imaginative and creative tendencies.

§36.21(b)(5) - - Kindergarten Instruction Program includes: (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69.

25 CFR §36.22 - Standard VII - Elementary Instructional Program

25 CFR §36.22, Standard VII - Elementary Instructional Program falls under Subpart C - Minimum Program of Instruction. There are eleven (11) core requirements assessed under §36.22.

The eleven core requirements assessed under §36.22 are:

1. §36.22(a)(1) - Elementary Instruction Program shall include: (1) Language arts.
2. §36.22(a)(2) - Elementary Instruction Program shall include: (2) Mathematics.
3. §36.22(a)(3) - Elementary Instruction Program shall include: (3) Social Studies.
4. §36.22(a)(4) - Elementary Instruction Program shall include: (4) Sciences.
5. §36.22(a)(5) - Elementary Instruction Program shall include: (5) Fine Arts.
6. §36.22(a)(6) - Elementary Instruction Program shall include: (6) Physical Education.
7. §36.22(b)(1) - School shall integrate content area into curriculum: (1) Career.
8. §36.22(b)(2) - School shall integrate content area into curriculum: (2) Environmental and Safety Education.
9. §36.22(b)(3) - School shall integrate content area into curriculum: (3) Health Education.

10. §36.22(b)(4) - School shall integrate content area into curriculum: (4) Metric Education.

11. §36.22(b)(5) - School shall integrate content area into curriculum: (3) Computer Literacy.

The initial assessment determined that HES has an 18.18% compliance rate for the §36.22 regulation and is not in compliance with the following nine requirements:

§36.22(a)(2) - Elementary Instruction Program shall include: (2) Mathematics.

§36.22(a)(3) - Elementary Instruction Program shall include: (3) Social Studies.

§36.22(a)(4) - Elementary Instruction Program shall include: (4) Sciences.

§36.22(a)(5) - Elementary Instruction Program shall include: (5) Fine Arts.

§36.22(b)(1) - School shall integrate content area into curriculum: (1) Career.

§36.22(b)(2) - School shall integrate content area into curriculum: (2) Environmental and Safety Education.

§36.22(b)(3) - School shall integrate content area into curriculum: (3) Health Education.

§36.22(b)(4) - School shall integrate content area into curriculum: (4) Metric Education.

§36.22(b)(5) - School shall integrate content area into curriculum: (3) Computer Literacy.

25 CFR §36.23, Standard VIII - Junior High/Middle School Instructional Program

25 CFR §36.23, Standard VIII - Junior High/Middle School Instructional Program falls under Subpart C - Minimum Program of Instruction. There are fifteen (15) core requirements assessed under §36.23.

The fifteen core requirements assessed under §36.23 include:

1. §36.23(a) - Instruction Program Philosophy and a progressive development from elementary program to the secondary program.
2. §36.23(b)(1) - Curriculum shall include required instruction content: (1) Language Arts.
3. §36.23(b)(2) - Curriculum shall include required instruction content: (2) Social Studies.
4. §36.23(b)(3) - Curriculum shall include required instruction content: (3) Mathematics.
5. §36.23(b)(4) - Curriculum shall include required instruction content: (4) Science.
6. §36.23(b)(5) - Curriculum shall include required instruction content: (5) Fine Arts and Practical Arts.

7. §36.23(b)(6) - Curriculum shall include required instruction content: (6) Computer Literacy.
8. §36.23(b)(7) - Curriculum shall include required instruction content: (7) Physical Education.
9. §36.23(c)(1) - Content area shall be integrated into curriculum: (1) Career Exploration and Orientation.
10. §36.23(c)(2) - Content area shall be integrated into curriculum: (2) Environmental and Safety Education.
11. §36.23(c)(3) - Content area shall be integrated into curriculum: (3) Metric Education.
12. §36.23(c)(4) - Content area shall be integrated into curriculum: (4) Consumer Economics.
13. §36.23(c)(5) - Content area shall be integrated into curriculum: (5) Health Education.
14. §36.23(d) - Languages other than English are encouraged to be offered as a content area.
15. §36.23(e) - Laboratory or vocational exploration class.

The initial assessment determined that HES has a 20% compliance rate for the §36.23 regulation and is not in compliance with the following eleven requirements:

§36.23(a) - Instruction Program Philosophy and a progressive development from elementary program to the secondary program.

§36.23(b)(2) - Curriculum shall include required instruction content: (2) Social Studies.

§36.23(b)(3) - Curriculum shall include required instruction content: (3) Mathematics.

§36.23(b)(4) - Curriculum shall include required instruction content: (4) Science.

§36.23(b)(5) - Curriculum shall include required instruction content: (5) Fine Arts and Practical Arts.

§36.23(b)(6) - Curriculum shall include required instruction content: (6) Computer Literacy.

§36.23(c)(1) - Content area shall be integrated into curriculum: (1) Career Exploration and Orientation.

§36.23(c)(2) - Content area shall be integrated into curriculum: (2) Environmental and Safety Education.

§36.23(c)(3) - Content area shall be integrated into curriculum: (3) Metric Education.

§36.23(c)(4) - Content area shall be integrated into curriculum: (4) Consumer Economics.

§36.23(c)(5) - Content area shall be integrated into curriculum: (5) Health Education.

25 CFR §36.30, Standard X - Grading Requirements

25 CFR §36.30, Standard X - Grading Requirements falls under Subpart D - Student Instruction Evaluation. There are five (5) core requirements assessed under §36.30.

The five core requirements assessed under §36.30 include:

1. §36.30(a) - Uniform Grading System assesses student's mastery of prescribed objectives.
2. §36.30(b) - Information derived from student instructional evaluations shall be shared with the student and with the parents.
3. §36.30(c) - Parent/Teacher conferences focused on student's instructional progress shall be held.
4. §36.30(d)(1-3) - Report card shall (1) Recommendations and probable promotion status; (2) Appropriate signatures and request for return of report cards; and (3) Student attendance record.
5. §36.30(e) - A summary of each year's final card shall become part of the student's permanent school record.

The initial assessment determined that HES has a 40% compliance rate for the §36.30 regulation and is not in compliance with the following three requirements:

§36.30(a) - Uniform Grading System assesses student's mastery of prescribed objectives.

§36.30(b) - Information derived from student instructional evaluations shall be shared with the student and with the parents.

§36.30(d)(1-3) - Report card shall (1) Recommendations and probable promotion status; (2) Appropriate signatures and request for return of report cards; and (3) Student attendance record.

25 CFR §36.31, Standard XI - Student Promotion Requirements

25 CFR §36.31, Standard XI - Student Promotion Requirements falls under Subpart D - Student Instruction Evaluation. There are four (4) core requirements assessed under §36.31.

The four core requirements assessed under §36.31 include:

1. §36.31 - Establish and implement a Promotion Policy which shall be submitted to and approved by the local school board and Area Education Program Administrator.
2. §36.31(a) - Each grade minimum criterion for student promotion based on primarily on measurable mastery of the instructional objectives.

3. §36.31(b) - Criterion-referenced tests that evaluate student skills shall be utilized for measuring the mastery of instructional objectives.
4. §36.31(c) - A student who has not participated, either directly or through approved alternative instructional methods or programs, in a minimum of 160 instructional days per academic term or 80 instructional days per semester without a written excused absence shall not be promoted.

The initial assessment determined that HES has a zero percent compliance rate for the §36.31 regulation and is not in compliance with the following three requirements:

§36.31 - Establish and implement a Promotion Policy which shall be submitted to and approved by the local school board and Area Education Program Administrator.

§36.31(a) - Each grade minimum criterion for student promotion based on primarily on measurable mastery of the instructional objectives.

§36.31(b) - Criterion-referenced tests that evaluate student skills shall be utilized for measuring the mastery of instructional objectives.

25 CFR §36.40, Standard XIII - Library/Media program

25 CFR §36.40., Standard XIII - Library/media program falls under Subpart E - Instructional Support. There are ten (10) core requirements assessed under §36.40.

The 10 core requirements assessed under §36.40 include:

1. §36.40(a) - Shall provide a library/media program that meets the applicable state and/or regional standards.
2. §36.40(a)(1) - Written set of instructional and service objectives shall be established with the librarian/media specialist with students and staff.
3. §36.40(a)(2) - A written policy for the selection of materials and equipment shall be developed by a library committee and approved by the school board.
4. §36.40(a)(2)(i)(A-C) - A collection of books suitable for the range of student abilities and interests being served meet ADM ratios.
5. §36.40(a)(2)(ii) - Eight (8) to 12 percent of the basic collection must be composed of reference books, currently relevant and in a state of good physical condition, for practical use.

6. §36.40(a)(2)(iii) - A periodical collection, suitable for the range of student abilities and interests being served, consisting of one (1) periodical for every ten (10) students, shall be maintained.
7. §36.40(a)(2)(iv) - A professional collection for the school staff shall be developed and maintained by the librarian in cooperation with a faculty committee.
8. §36.40(a)(2)(v) - A variety of audio-visual materials, suitable for the range of instruction being provided, of at least 750 items or five (5) items for each student, whichever is larger, and inclusive of materials located in the classrooms shall be maintained.
9. §36.40(a)(3) - There shall be a library media center serviced by a librarian.
10. §36.40(a)(4) - All libraries must conduct an annual inventory of available books, materials, and equipment in accordance with the acquisitions and selection policies.

The initial assessment determined that HES has a zero percent compliance rate for the §36.40 regulation and is not in compliance with the following ten requirements:

§36.40(a) - Shall provide a library/media program that meets the applicable state and/or regional standards.

§36.40(a)(1) - Written set of instructional and service objectives shall be established with the librarian/media specialist with students and staff.

§36.40(a)(2) - A written policy for the selection of materials and equipment shall be developed by a library committee and approved by the school board.

§36.40(a)(2)(i)(A-C) - A collection of books suitable for the range of student abilities and interests being served meet ADM ratios.

§36.40(a)(2)(ii) - Eight (8) to 12 percent of the basic collection must be composed of reference books, currently relevant and in a state of good physical condition, for practical use.

§36.40(a)(2)(iii) - A periodical collection, suitable for the range of student abilities and interests being served, consisting of one (1) periodical for every ten (10) students, shall be maintained.

§36.40(a)(2)(iv) - A professional collection for the school staff shall be developed and maintained by the librarian in cooperation with a faculty committee.

§36.40(a)(2)(v) - A variety of audio-visual materials, suitable for the range of instruction being provided, of at least 750 items or five (5) items for each student, whichever is larger, and inclusive of materials located in the classrooms shall be maintained.

§36.40(a)(3) - There shall be a library media center serviced by a librarian.

§36.40(a)(4) - All libraries must conduct an annual inventory of available books, materials, and equipment in accordance with the acquisitions and selection policies.

25 CFR §36.41, Standard XIV - Textbooks

25 CFR §36.41, Standard XIV - Textbooks falls under Subpart E - Instructional Support. There are three (3) core requirements assessed under §36.41.

The three core requirements assessed under § 36.41 include:

1. §36.41(a)- Each school shall establish a textbook review committee composed of teachers, parents, and students, and school board members.
2. §36.41(b)(1-3)- The textbook review committee shall establish a procedure and criteria for the annual review of textbooks and other materials used to complement instruction.
3. §36.41(c)- Each school shall equitably distribute instructional materials to all classrooms. Each school shall inventory all property and equipment annually prior to requisitioning additional materials.

The initial assessment determined that HES has a zero percent compliance rate for the §36.41 regulation and is not in compliance with the following three requirements:

§36.41(a)- Each school shall establish a textbook review committee composed of teachers, parents, and students, and school board members.

§36.41(b)(1-3)- The textbook review committee shall establish a procedure and criteria for the annual review of textbooks and other materials used to complement instruction.

§36.41(c)- Each school shall equitably distribute instructional materials to all classrooms. Each school shall inventory all property and equipment annually prior to requisitioning additional materials.

25 CFR §36.42, Standard XV - Counseling Services

25 CFR §36.42, Standard XV - Counseling Services falls under Subpart E - Instructional Support. There are seventeen (17) core requirements assessed under §36.42.

The 17 core requirements assessed under § 36.42 include:

1. §36.42 - Each school shall offer student counseling services concerned with physical, social, emotional, intellectual, and vocational growth for each individual. Counseling services shall be included in a school-wide assessment program.

2. §36.42(a) - Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
 3. §36.42(a)(1) - Each Spring, schools shall conduct testing for grades 4, 8, and 12 using a current version of a standardized academic achievement test based upon the national assessment standards designed to assess higher order thinking skills. All schools shall keep a current record, with the Office of Indian Education Programs, of the test the school administers each Spring and the testing dates.
 4. §36.42(a)(2) - Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.
 5. §36.42(a)(3) - Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.
 6. §36.42(a)(4) - Parents/guardians shall be informed of their children's assessment results and provided with an explanation and interpretation to ensure adequate understanding of the results.
 7. §36.42(a)(5) - Each school's instructional program shall establish an ongoing student academic assessment program to ensure that defined assessment procedures are in place. The program shall include regular training in basic assessment procedures and routines for all teachers and other staff involved in student assessment.
 8. §36.42(a)(6) - Each Agency and Area, as appropriate, shall report the results of each school's formal Spring tests to the Office of Indian Education Programs by August 1 of each year. Summative information from performance-based and authentic assessments shall be reported at the same time.
 9. §36.42(b)(1) - The counseling program shall provide the following: Each school having a minimum school ADM of 200 students shall make provisions for the full-time professional services of a counselor, and each school enrolling fewer than 200 students shall make provisions for a part-time professional counselor.
 10. §36.42(b)(2) - The counseling program shall provide the following: The counselors shall be familiar with the unique tribal, social, and economic characteristics of students.

11. §36.42(b)(3)(i) - The counseling program shall contain the following: A written referral process
12. §36.42(b)(3)(ii) - The counseling program shall contain the following: Counseling techniques and documentation procedures to provide for the career, academic, social, and personal needs of the students which are based on the cultural beliefs and values of the students being served.
13. §36.42(b)(3)(iii) - The counseling program shall contain the following: Preventative and crisis counseling on both individual and group bases
14. §36.42(b)(3)(iv) - The counseling program shall contain the following: Confidentiality and security of counseling records for each student; and
15. §36.42(b)(3)(v) - The counseling program shall contain the following: Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.
16. §36.42(b)(3)(vi) - The counseling program shall contain the following: Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests.
17. §36.42(b)(3)(vii) - The counseling program shall contain the following: Each high school counseling program shall be required to have on file for each student a planned academic program of studies which is available from the regular course offerings of the school to meet the student's career objectives, and which will show that the student has received counseling.

The initial assessment determined that HES has a 17.65% compliance rate for the §36.42 regulation and is not in compliance with the following thirteen requirements:

§36.42 - Each school shall offer student counseling services concerned with physical, social, emotional, intellectual, and vocational growth for each individual. Counseling services shall be included in a school-wide assessment program.

§36.42(a) - Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:

§36.42(a)(1) - Each Spring, schools shall conduct testing for grades 4, 8, and 12 using a current version of a standardized academic achievement test based upon the national assessment standards designed to assess higher order thinking skills. All schools shall keep a current record, with the Office of Indian Education Programs, of the test the school administers each Spring and the testing dates.

§36.42(a)(2) - Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.

§36.42(a)(3) - Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.

§36.42(a)(4) - Parents/guardians shall be informed of their children's assessment results and provided with an explanation and interpretation to ensure adequate understanding of the results.

§36.42(a)(5) - Each school's instructional program shall establish an ongoing student academic assessment program to ensure that defined assessment procedures are in place. The program shall include regular training in basic assessment procedures and routines for all teachers and other staff involved in student assessment.

§36.42(a)(6) - Each Agency and Area, as appropriate, shall report the results of each school's formal Spring tests to the Office of Indian Education Programs by August 1 of each year. Summative information from performance-based and authentic assessments shall be reported at the same time.

§36.42(b)(3)(i) - The counseling program shall contain the following: A written referral process

§36.42(b)(3)(ii) - The counseling program shall contain the following: Counseling techniques and documentation procedures to provide for the career, academic, social, and personal needs of the students which are based on the cultural beliefs and values of the students being served.

§36.42(b)(3)(iv) - The counseling program shall contain the following: Confidentiality and security of counseling records for each student; and

§36.42(b)(3)(v) - The counseling program shall contain the following: Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.

§36.42(b)(3)(vi) - The counseling program shall contain the following: Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests.

25 CFR §36.43, Standard XVI - Student Activities

25 CFR §36.43, Standard XVI - Student Activities falls under Subpart E - Instructional Support. There are ten (10) core requirements assessed under §36.43.

The 10 core requirements assessed under §36.43 include:

1. §36.43 - All schools shall provide and maintain a well-balanced student activities program based on assessment of both student and program needs.
2. §36.43(a) - All student activities shall be required to have qualified sponsors and be approved by the school supervisor, and the school board shall approve the overall activity plan.
3. §36.43(b) - A plan of student activity operations shall be submitted, by each activity at the beginning of each school year, to the school supervisor. The plan will include the purpose, structure, coordination, and planned types of fund-raising activities.
4. §36.43(c) - School may participate in interscholastic sports and activities on an informal or formal basis.
5. §36.43(d) - Until comparable competitive opportunities are provided to all students, regardless of sex, no student shall be barred from participation in interscholastic competition in noncontact sports except on the basis of individual merit.
6. §36.43(e) - Residential schools shall plan and provide an intramural program for all students. The program shall include a variety of scholastic and sport activities.
7. §36.43(f) - Students shall be involved only in activities which are sanctioned by the school.
8. §36.43(g) - All student activities involved only in fund raising are required to establish a school/student activity bank account following school/student banking procedures outlined under 25 CFR 31.7. All student activity accounts shall be audited annually.
9. §36.43(h) - The school shall provide for the safety and welfare of students participating in school-sponsored activities.
10. §36.43(i) - Each sponsor of a student activity will be given orientation and training covering the responsibilities of a sponsor by the school supervisor.

The initial assessment determined that HES has a 16.67% compliance rate for the §36.43 regulation and is not in compliance with the following five requirements:

§36.43 - All schools shall provide and maintain a well-balanced student activities program based on assessment of both student and program needs.

§36.43(a) - All student activities shall be required to have qualified sponsors and be approved by the school supervisor, and the school board shall approve the overall activity plan.

§36.43(b) - A plan of student activity operations shall be submitted, by each activity at the beginning of each school year, to the school supervisor. The plan will include the purpose, structure, coordination, and planned types of fund-raising activities.

§36.43(h) - The school shall provide for the safety and welfare of students participating in school-sponsored activities.

§36.43(i) - Each sponsor of a student activity will be given orientation and training covering the responsibilities of a sponsor by the school supervisor.

25 CFR §36.50, Standard XVII - School Program Evaluation and Needs Assessment

25 CFR §36.50, Standard XVII - School Program evaluation and needs assessment falls under Subpart F - Evaluation of Educational Standards. There are three core requirements assessed under §36.50.

The three core requirements of §36.50 are:

1. §36.50- Each school shall complete a formal, formative evaluation at least once every seven (7) years beginning no later than the second complete school year following the effective dates of this part.
2. §36.50(a)- Each school's evaluation design or model will provide objective and quantitative analysis of each area to be evaluated.
3. §36.50(b)- The Director, within six (6) months from the effective date of this part, shall distribute to each school, Agency, or Areas appropriate, a standardized needs assessment and evaluation instrument with guidelines for developing and applying a locally appropriate evaluation model for carrying out the requirements of this standard.

The initial assessment determined that HES has a 100% compliance rate for the §36.50 regulation.

25 CFR §36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities

25 CFR §36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities falls under Subpart F - Evaluation of Educational Standards. There are five (5) core requirements assessed under §36.5.

The five core requirements of §36.51 are:

1. §36.51(a)- The Office of Indian Education Programs shall monitor and evaluate the conformance of each Agency or Area, as appropriate, and its schools with the requirements of this part.

2. §36.51(b)- Each Agency or Area, as appropriate, in conjunction with its school board shall monitor and evaluate the conformance of its school with the requirements of this part through an annual onsite evaluation involving one-third of the schools annually, thereby monitoring onsite each school at least once every three (3) years.
3. §36.51(c)- Schools, Agencies, and Areas shall keep such records and submit to the responsible official or designee accurate reports at such times, in such form, and containing such information as determined by that official to be necessary to ascertain conformance with the requirements of this part.
4. §36.51(d)- Schools, Agencies, and Areas shall permit access for examination purposes by the responsible official, or any duly authorized designee, to any school records and other sources of information which are related or pertinent to the requirements of this part.
5. §36.51(e)- The Office of Indian Education Programs, Agency Superintendent for Education, or Area Education Programs Administrator, as appropriate, shall annually conduct a summative evaluation to assess the degree to which each Bureau educational policy and administrative procedure assists or hinders schools in complying with the requirements of this part.

The initial assessment determined that HES has a 20% compliance rate for the §36.51 regulation and is not in compliance with the following three requirements:

§36.51(a)- The Office of Indian Education Programs shall monitor and evaluate the conformance of each Agency or Area, as appropriate, and its schools with the requirements of this part.

§36.51(b)- Each Agency or Area, as appropriate, in conjunction with its school board shall monitor and evaluate the conformance of its school with the requirements of this part through an annual onsite evaluation involving one-third of the schools annually, thereby monitoring onsite each school at least once every three (3) years.

§36.51(e)- The Office of Indian Education Programs, Agency Superintendent for Education, or Area Education Programs Administrator, as appropriate, shall annually conduct a summative evaluation to assess the degree to which each Bureau educational policy and administrative procedure assists or hinders schools in complying with the requirements of this part.