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# Havasupai Elementary School Work Plan

Updated December 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 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 will be updated on an ongoing basis and posted online every 90 days 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 January 7, 2025.

### **Havasupai Elementary School 90-Day Work Plan**

As the school year has progressed, HES has been diligently working to establish effective systems, routines, and procedures to achieve compliance and maintain it consistently. Despite facing challenges from the outset of the school year, the school has demonstrated unwavering commitment to meeting the needs of our students, staff, and community. We are proud of the progress made and continue to strive for excellence in all aspects of our educational environment. These dedicated efforts reflect our determination to create a supportive and thriving atmosphere for all stakeholders.

The updated 90-day work plan focuses on the school's progress since the initial plan. It aims to foster transparency and accountability by outlining the adjusted action steps and timelines and adding new resources where needed. The plan identifies responsible BIE staff and specifies monitoring activities and success criteria. Progress and any 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 conjunction with the initial assessment, this work plan provides details of the scope of work required by the BIE to ensure compliance with the 13 regulations. The work plan will be reviewed and revised every 90 days, with the next update scheduled for publication in April 2025. The next work plan will be adjusted based on the annual report and assessment of compliance with the 13 regulations. Our vision is 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. Frankie Chretien at [frances.chretien@bie.edu](mailto: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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. All class sizes for the 2024-2025 School year meet the required class size ratios.</li> <li>2. Recruitment/Retention policy was completed and uploaded to Plan4Learning by June 30, 2024. It is missing some elements of the Settlement agreement and work with the facilitator. A new completion date is identified to give time for revision and planning with the Facilitator.</li> <li>3. BIE is currently in the process of contracting with a new facilitator.</li> <li>4. Class Rosters are updated in NASIS with the correctly identified classroom teacher. Rosters were verified during the onsite support visit.</li> <li>5. NASIS training for the Principal and Secretary was completed on May 29, 2024, and records training was completed on August 15.</li> </ol>	<p>Current class ratios for the 24-25 School year according to the NASIS attendance Register report are as follows:</p> <ul style="list-style-type: none"> <li>Kindergarten-1–13 students</li> <li>Grades 1-2–12 students</li> <li>Grades 3-4–17 students</li> <li>Grades 5-6–13 students</li> <li>Grades 7-8–14 students</li> </ul>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, NASIS Specialist, Education Program Administrator

<b>Resources</b>	<p>Sample BIE <a href="#">Recruitment/Retention Plan</a></p> <p>The following educator preparation programs may be sources for recruitment: <a href="#">Northern Arizona University Institute of Native Serving Educators</a> <a href="#">University of Arizona Indigenous Teacher Education Program</a></p>
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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.	All class size ratios meet regulation requirements for the 2024-2025 School Year.
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, 2025
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.	NASIS training completed May 29, 2024  Records training completed on August 15, 2024



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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A request for a waiver was submitted to the BIE Director on May 15, 2024.</li> <li>2. See above</li> <li>3. The draft has been added to the SharePoint site along with documentation that waiver was received by the director.</li> <li>4. The SharePoint site was established on June 5, 2024, and is being utilized for school records.</li> </ol>
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<b>Initial Assessment Finding</b>	HES has not submitted a justification for a request for a staffing waiver to be approved for School Year 2023-2024.
<b>BIE Staff Responsible</b>	Principal, Secretary, Education Program Administrator
<b>Resources</b>	<p>Link to request a <a href="#">SharePoint</a>.</p> <p>The following educator preparation programs may be sources for recruitment:  <a href="#">Northern Arizona University Institute of Native Serving Educators</a> <a href="#">University of Arizona Indigenous Teacher Education Program</a></p>

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.	October 2024
4. Request and establish a school SharePoint site.	Completed June 5, 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The substitute tracker was created on June 9, 2024, for the 2024-2025 School year. The principal has started tracking coverage for the school year. The system for tracking coverage has not been created and documented in a procedural document. The timeline for this task is updated.</li> <li>2. HES does not currently have substitute teacher positions filled. One applicant is pending for a substitute teacher.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not have substitute teachers. There is also no system for documenting class coverage in the regular teacher's absence.
<b>BIE Staff Responsible</b>	Principal, Secretary, Education Program Administrator, Business technician
<b>Resources</b>	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, <a href="https://www.azed.gov/educator-certification/substitute-prek-12">https://www.azed.gov/educator-certification/substitute-prek-12</a>

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.	January 2025
2. Review substitute teacher applications. Ensure applicants meet qualifications for state substitute certification.	December 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. Enrollment and attendance policies have been reviewed and updated in the 2024-2025 student and staff handbooks. The compliance specialist will review the enrollment form during the next site visit.</li> <li>2. Attendance policies have been reviewed and updated in the student-Parent and Staff handbooks and comply with 25 CFR 31.</li> <li>3. Teachers were trained on attendance expectations during orientation on August 8, 2024.</li> <li>4. The teachers take attendance daily and verify weekly by signing the attendance register report. This was verified during the October 2024 site visit.</li> </ol>
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<b>Initial Assessment Finding</b>	<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>
<b>BIE Staff Responsible</b>	Principal, Secretary, Teachers
<b>Resources</b>	<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. <a href="https://weeac.wested.org/resource/chronic-absence-session-4-increasing-attendance-and-engagement-for-american-indian-and-alaska-native-students/">https://weeac.wested.org/resource/chronic-absence-session-4-increasing-attendance-and-engagement-for-american-indian-and-alaska-native-students/</a></p> <p>Classroom Attendance Calculator <a href="https://www.attendanceworks.org/resources/data-tools/classroom-attendance-calculator/">https://www.attendanceworks.org/resources/data-tools/classroom-attendance-calculator/</a> 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</p>



	<p>educators to assess the steps they are taking now and what more they can do to reduce chronic absence.</p> <p><a href="#">Guide to Using the Attendance Playbook: Smart Solutions for Reducing Student Absenteeism Post-Pandemic</a>  <a href="https://www.attendanceworks.org/resources/attendance-playbook/">https://www.attendanceworks.org/resources/attendance-playbook/</a></p> <p>The guide helps educators target sports to groups of students who need 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.</p>
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Action Steps	Timeline
1. Review and rewrite attendance and enrollment policies and related forms/documents such as enrollment forms.	Completed August 2024
2. Develop a system and expectations for tracking attendance.	Completed 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.

<b>Progress:</b>	<p>*Immunizations were checked during the fall 2024 ISEP review. All files checked had a copy of the student’s immunizations. Currently, the school has immunizations uploaded for all students except for one.</p> <ol style="list-style-type: none"> <li>1. IHS conducted health screenings on September 10<sup>th</sup> and 11<sup>th</sup> and these screenings included an immunization review.</li> <li>2. The ADD-BOS Behavior Health Specialist is meeting with IHS regularly to support HES.</li> <li>3. ADD-BOS Education Specialists are working to develop this letter as a support to the school. It has not yet been completed. The date is adjusted to give time to complete, review, and utilize the letter.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, counselor, BOS behavior health coordinator, Registrar/Secretary, Associate Deputy Director BOS management analyst
<b>Resources</b>	<p>Public Health Nurse</p> <p>Supai Health Station may be a partner for health-related resources and learning opportunities for students, families, and staff.</p> <p>Staff may benefit from professional learning about Arizona’s school immunization guidance  <a href="https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/immunization/school-childcare/nofollow/school-childcare-immunization-guide.pdf">https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/immunization/school-childcare/nofollow/school-childcare-immunization-guide.pdf</a></p>

Action Steps	Timeline
1. Work to 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	March 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. HES has confirmed training for cultural awareness scheduled on December 20, 2024, according to the 2024-2025 training schedule.</li> <li>2. Teachers submit lesson plans weekly using a basic template. The lesson plan template and requirements will be expanded as teachers are trained. The timeline is updated to allow for staff training on multicultural dimensions.</li> <li>3. HES participates in Network Learning Communities (NLC) throughout the school year to collaborate with and gain support from other BIE schools. These are documented and scheduled on their 2024-2025 Training Schedule.</li> <li>4. On August 8, 2024, teachers were trained on expectations. They are to submit lesson plans using the required template on Mondays.</li> </ol>
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<b>Initial Assessment Finding</b>	HES has no explicit expectation or accountability for this requirement.
<b>BIE Staff Responsible</b>	Principal, Teachers, counselors, ADD-BOS Culture and Language Specialist
<b>Resources</b>	<p>From Beliefs to Action: Designing Culturally-Responsive Systems  <a href="https://weeac.wested.org/library/?resource_type=webinar&amp;topic=culturally-responsive-systems">https://weeac.wested.org/library/?resource_type=webinar&amp;topic=culturally-responsive-systems</a> This webinar series features strategies to navigate the core tensions experienced by educators when discussing race and equity, a foundational understanding of how beliefs, policies, procedures, and practices contribute to racial inequities, and skills to steer conversations that promote understanding, empathy, and collaboration while addressing potentially sensitive topics. The series addresses manifestations of culture within schools and classrooms and culturally responsive family and community engagement</p> <p>Culturally Responsive Instruction for Native American Students  <a href="https://csaa.wested.org/spotlights/culturally-responsive-instruction-for-native-american-students/">https://csaa.wested.org/spotlights/culturally-responsive-instruction-for-native-american-students/</a></p> <p>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</p>

	relevant to developing an understanding that supports approaching Native subject matter. CRESTT, UCLA, WestEd.
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Action Steps	Timeline
1. Acquire resources and training for teachers and administration on multi-cultural dimensions	Scheduled for December 20, 2024
2. Establish a lesson plan template with a requirement for multi-culture and multi-ethnic dimensions	April 2025
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, 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

**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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. BIE is currently in the process of contracting with a new facilitator. Assessments embedded in the language and culture curriculum created by Sundance.</li> <li>2. HES has contracted with Sundance Educational Consulting to create language resources. They have created a curriculum map for language and culture instruction inhhhhhhhhh each grade level.</li> <li>3. Sundance Educational Consulting has developed a culture and language curriculum with materials and assessments for each grade level.</li> <li>4. The proposed curriculum has been submitted to the tribe for approval on 8/31/24.</li> <li>5. The Culture and language teacher was trained and receives ongoing support.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not implement a language arts program that includes assessment or instruction of the primary native language.
<b>BIE Staff Responsible</b>	Principal, Culture teacher, ADD Culture and language specialist, Facilitator
<b>Resources</b>	<p><a href="#">Publicly available Resources related to Culturally responsive regulations.</a></p> <p><b>American Indian Indigenous Teacher Education Conference</b>  <a href="https://nau.edu/college-education/annual-indigenous-teacher-education-conference/">https://nau.edu/college-education/annual-indigenous-teacher-education-conference/</a>          Northern Arizona University’s College of Education will host the 14<sup>th</sup> 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 and Timeline on the next page.



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.	Ongoing SY 2024-2025
2. Work to build a curriculum map for language and culture in each grade level.	Completed August 31, 2024
3. Develop a curriculum with a scope and sequence, materials, and assessment for each grade level.	Completed August 31, 2024
4. Submit the proposed program to the tribe for approval	Submitted to the tribe on August 31, 2024
5. Provide professional development to the culture teacher on topics such as lesson planning and language assessment development.	Trained on August 16, 2024, and September 30, 2024

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. HES has confirmed training for cultural awareness scheduled on December 20, 2024, according to the 2024-2025 training schedule.</li> <li>2. BIE is currently in the process of contracting with a new facilitator.</li> <li>3. Literature and materials were identified as a need in the school-wide program plan, and the school has included this in the projected budget. The school has culturally relevant materials, but they need to be organized and cataloged by a librarian. The date was adjusted to reflect the hiring of a new librarian. The position was posted, and the school is waiting for the certificate of eligible applicants.</li> <li>4. The school has not submitted a cultural curriculum to the tribe because these materials are still being developed. Sundance did develop materials for the cultural teacher, but materials have not been provided for all curriculum areas.</li> <li>5. The school has received the kindergarten Unit for the culturally enhanced STEAM curriculum. The school is inquiring about the development of additional units. The date is adjusted to give time to review and plan for the implementation on the materials developed.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not expect the inclusion of native culture in the curriculum.
<b>BIE Staff Responsible</b>	Principal, Culture and Language teacher, ADD-BOS Culture and Language Specialist, Facilitator
<b>Resources</b>	<p>Native Knowledge 360  <a href="https://americanindian.si.edu/nk360/professional-development/upcoming-webinars">https://americanindian.si.edu/nk360/professional-development/upcoming-webinars</a>            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  <a href="#">Native Knowledge 360</a> 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 <a href="https://ies.ed.gov/ncee/rel/Products/Region/west/Blog/107352">https://ies.ed.gov/ncee/rel/Products/Region/west/Blog/107352</a></p>
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Action Steps	Timeline
1. Acquire training for all staff on culturally relevant instruction and culturally enhanced curriculum.	Scheduled for December 20, 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.	March 2024
4. Submit all content developed to the tribe for approval.	July 2025
5. Implement Culturally enhanced STEAM curriculum and activities into classroom instruction	March 2025

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.

<b>Progress:</b>	1. The school has scheduled learning styles assessment training on 12/13/24 and will select appropriate learning style assessments for each grade level. The timeline will be adjusted to give time to find and select an assessment once training is complete.
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<b>Initial Assessment Finding</b>	HES has not conducted a learning style assessment to inform instruction.
<b>BIE Staff Responsible</b>	Principal, teachers, ADD BOS curriculum and Instruction Specialist
<b>Resources</b>	<a href="#">How Teachers use Gardner’s Multiple Intelligences Theory</a> This article explains Gardner’s Multiple Intelligences theory, which proposes ways educators may address students’ varied strengths and improve teaching strategies.

Action Steps	Timeline
1. Select an electronic learning style assessment for each grade band that will compile class data and generate activities.	March 2025
2. Acquire resources and training for teachers by content area and grade level for different learning styles.	March 2025 for resources. Training schedules for December 13, 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.	April 2025

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. Monthly Contract meetings were started on 10/3/24 to track and review all the open/pending contracts for the Havasupai Elementary School.</li> <li>2. Positions for library and PE are posted to be full-time and in the canyon.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	HES Assigned contracting officer representative (COR), HES assigned COR(s), Principal, Business technician, Budget analyst
<b>Resources</b>	<a href="#"><u>Three Steps to a Strategic Schedule: Creating Effective School Schedules</u></a> ERS proposes a three-step process for school scheduling that maximizes available resources (people, time, and money) while meeting the needs of students and teachers.

Action Steps	Timeline
1. Establish a standing contracting meeting once per month with a tracking sheet for all contracts.	October 2024
2. Review contracts and subscriptions through UDO reports by looking at when they expire and if they have an option year.	April 2025
3. Develop a procurement list that identifies the needs of the school.	May 1, 2025
4. 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
5. 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. HES has selected and acquired the Savvas Curriculum for Kindergarten through 8th grades. The kindergarten teacher is implementing the selected curriculum and receiving ongoing support and training according to the 2024-2025 training schedule.</li> <li>2. Kindergarten teacher is submitting weekly lesson plans.</li> <li>3. The administrator collects and reviews lesson plans. The administrator has not started walkthroughs for the 2024-2025 School year.</li> <li>4. BIE is currently in the process of contracting with a new facilitator. 8</li> </ol>
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<b>Initial Assessment Finding</b>	HES has not fully implemented the kindergarten curriculum due to multi-grade classrooms. HES has not incorporated the Native language into the curriculum.
<b>BIE Staff Responsible</b>	Kindergarten teacher, Principal, Facilitator, ADD-BOS curriculum and instruction specialist, ADD-BOS Culture, and language specialist
<b>Resources</b>	<p>Developmentally Appropriate Practice in Kindergarten: Observation Guide <a href="https://www.wested.org/resources/developmentally-appropriate-practice-in-kindergarten-observation-guide/">https://www.wested.org/resources/developmentally-appropriate-practice-in-kindergarten-observation-guide/</a></p> <p>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.</p>

Action Steps and Timeline on the next page.



Action Steps	Timeline
1. Kindergarten teacher will implement an appropriate grade-level kindergarten curriculum.	SY 2024-2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. 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. The kindergarten teacher is implementing the selected curriculum and receiving ongoing support and training according to the 2024-2025 training schedule.</li> <li>2. The kindergarten teacher is submitting weekly lesson plans.</li> <li>3. The administrator collects and reviews lesson plans. The administrator has not started walkthroughs for the 2024-2025 School year.</li> <li>4. The kindergarten teacher is implementing the selected curriculum and receiving ongoing support and training according to the 2024-2025 training schedule.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not follow a curriculum that includes exploration of the environment, psychomotor and socialization development, or development of imaginative and creative tendencies.
<b>BIE Staff Responsible</b>	Kindergarten teacher, Principal, ADD-BOS curriculum and instruction specialist
<b>Resources</b>	<p>Joyful Literacy with Young Children  <a href="https://www.wested.org/joyful-reading-writing-and-creative-expression-with-young-children/">https://www.wested.org/joyful-reading-writing-and-creative-expression-with-young-children/</a>  <b>Joyful Literacy</b> 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The contracted physical Education teacher is providing health along with physical education as evidenced in the submitted lesson plans.</li> <li>2. The PE teacher is submitting weekly lesson plans and documenting health connections.</li> <li>3. The school administrator has not started classroom walkthroughs for the 2024-2025 School year.</li> <li>4. The ADD-BOS Behavior Health Specialist is working with Indian Health Services. They have tentatively agreed to health lessons/presentations once per month.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not implement an instructional program that includes Health Education.
<b>BIE Staff Responsible</b>	School contracted PE teacher, Principal, BOS behavior health coordinator, ADD BOS management analyst
<b>Resources</b>	<p>K-2 Personal Health Series</p> <p><a href="https://classroom.kidshealth.org/classroom/index.jsp?Grade=pk&amp;Section=personal">https://classroom.kidshealth.org/classroom/index.jsp?Grade=pk&amp;Section=personal</a></p> <p>This site provides teacher’s guides and lesson plans to help younger students learn how they can improve their own health.</p>

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)(2-4)

- (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’s instructional program will include Math, Social Studies, and Science, as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

**Funding /Expenditures necessary:**

No additional funding or expenditures are necessary.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The master schedule has been updated and includes time for Mathematics, Social Studies, and Science.</li> <li>2. Elementary teachers have started the school year implementing the Savvas curriculum</li> <li>3. Elementary teachers must write lesson plans and turn them in on Mondays.</li> <li>4. The principal is reviewing lesson plans but has not started classroom walkthroughs for the school year 2024-2025.</li> <li>5. Teachers have received training on the Savvas curriculum and according to the 2024-2025 training schedule, they will have ongoing support and training. Teachers will participate in Network learning communities with teachers in other Bureau-Operated schools.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Elementary teachers, Principal, ADD-BOS curriculum and instruction specialist
<b>Resources</b>	Native Knowledge 360, Smithsonian’s National Museum of the American Indian <a href="https://americanindian.si.edu/nk360/lessons-resources/search-resources">https://americanindian.si.edu/nk360/lessons-resources/search-resources</a> The site has a search feature for locating cross-disciplinary lesson plans at different grade levels, including Math, Social Studies, and Science.

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. 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The school budget was reviewed and is currently being adjusted to ensure funding for all school priorities.</li> <li>2. There is room to modify an existing contract to add on a Fine Arts teacher if needed to come into compliance. Action step 2 was modified to refine the action needed to contract a Fine Arts teacher. The date is adjusted to give time for the process of adding a fine arts position to the contracts.</li> <li>3. BIE is currently in the process of contracting with a new facilitator.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not offer a Fine Arts program.
<b>BIE Staff Responsible</b>	Principal, Education Program Administrator, school-assigned contracting officer, Facilitator
<b>Resources</b>	<a href="#">Institute of American Indian Arts</a> 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.	The budget was created on June 30, 2024, and currently adjusting.
2. Examine the school’s master schedule to determine the exact needs and expectations of a Fine Arts teacher. Work to add this position to the existing contract.	March 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A Savvas representative was contacted but did not provide the information needed. The school will set up a meeting to discuss but the school SAVVAS rep is currently out on extended leave. The date is adjusted to give time to meet with Savvas and review the curriculum.</li> <li>2. The school counselor is currently teaching the 3<sup>rd</sup>/4<sup>th</sup> grade class due to the assigned teacher being out unexpectedly.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not provide core programming to integrate these content areas into the curriculum.
<b>BIE Staff Responsible</b>	Principal, Elementary teachers, School counselor, ADD BOS curriculum, and Instruction Specialist
<b>Resources</b>	Micro-Course Indigenous Pathways in Planning for College, Career, and Community Life <a href="https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/">https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/</a>

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.	March 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The contracted physical Education teacher is providing health along with physical education as evidenced in the submitted lesson plans.</li><li>2. The PE teacher is submitting weekly lesson plans and documenting health connections.</li><li>3. The school administrator has not started classroom walkthroughs for the 2024-2025 School year.</li><li>4. The ADD-BOS Behavior Health Specialist is working with Indian Health Services. They have tentatively agreed to health lessons/presentations once per month.</li></ol>
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<b>Initial Assessment Finding</b>	HES does not integrate health education into its curriculum
<b>BIE Staff Responsible</b>	School contracted PE teacher, principal, BOS behavior health coordinator, ADD BOS management analyst
<b>Resources</b>	<p><u><a href="#">KidsHealth in the Classroom</a></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 <a href="https://www.azed.gov/pe/health-education">https://www.azed.gov/pe/health-education</a></p>

Action Steps and Timeline on the next page.

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

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The school received enough computers for all students. The inventory has been completed.</li><li>2. The school purchased a computer literacy program.</li><li>3. There is not yet a lesson plan component, but the classes are scheduled to work on computer literacy during enrichment time in the master schedule.</li><li>4. Teachers are currently turning in lesson plans. The expectations will be expanded as teachers receive training.</li><li>5. The administrator has not started walkthroughs for the 2024-2025 school year.</li></ol>
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<b>Initial Assessment Finding</b>	HES does not provide core programming to integrate this content area into the curriculum.
<b>BIE Staff Responsible</b>	Principal, IT, Elementary teachers
<b>Resources</b>	Everything You Need to Teach Digital Citizenship <a href="https://www.common sense.org/education/digital-citizenship">https://www.common sense.org/education/digital-citizenship</a> This K-12 Digital Citizenship Curriculum provides lesson plans by grade level to address timely topics and prepare students to take ownership of their digital lives.  Teacher Digital Learning Guide: TEACHING DIGITAL CITIZENSHIP & SAFETY <a href="https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b">https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b</a> This guide is designed to provide important resources and recommendations to support teacher implementation of digital learning.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Conduct an Inventory of working computers on campus	Completed November 2024
2. Work on the School-wide budget to acquire the technology needed to teach computer literacy	Completed June 30, 2024
3. Add computer literacy as a lesson plan component	January 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A comprehensive needs assessment was conducted when developing the BIE One Plan (School Improvement Plan), however, there was no input from the tribe, community, parent/guardians, students, and staff. This will be a part of the process for the BIE One Plan due on June 30, 2025.</li> <li>2. This will be a part of the comprehensive needs assessment in 2025.</li> <li>3. Teachers are expected to use the school-selected curriculum. This is being monitored through lesson plans.</li> <li>4. HES participated in the curriculum mapping project through the Phoenix ERC. The ADD-BOS curriculum Specialist shared the maps and will review them with the school principal. Action step changed to reflect this.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not currently offer an instructional program that is a part of progressive development for all instructional areas.
<b>BIE Staff Responsible</b>	Principal, teachers, Facilitator, 7/8 <sup>th</sup> grade teacher, ADD BOS curriculum, and Instruction specialist.
<b>Resources</b>	<p>Curriculum Mapping Tips for New Teachers  <a href="https://www.edutopia.org/article/curriculum-mapping-tips-new-teachers/">https://www.edutopia.org/article/curriculum-mapping-tips-new-teachers/</a></p> <p>Sample curriculum maps from Arizona school districts            Scottsdale Unified School District  <a href="https://www.susd.org/academics/curriculum/curriculum-maps">https://www.susd.org/academics/curriculum/curriculum-maps</a>            Paradise Valley Schools  <a href="https://www.pvschools.net/academics/curriculum/elementary-k-6-curriculum-overview">https://www.pvschools.net/academics/curriculum/elementary-k-6-curriculum-overview</a></p>

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, 2025
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, 2025
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 review the curriculum maps created from the curriculum mapping project led by the ADD-BOS curriculum specialist.	December 2024
5. Curriculum maps will be posted on the school SharePoint site and utilized in instructional planning.	January 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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The master schedule has been created to include sufficient time for all subjects for the 2024-2025 School year.</li><li>2. The 7<sup>th</sup> /8th-grade teacher is implementing the selected and appropriate grade-level curriculum for each subject area as evidenced through lesson plans.</li><li>3. See #2 update.</li><li>4. The administrator does review lesson plans but has not started classroom walkthroughs for the 2024-2025 school year.</li><li>5. HES teachers have received Savvas training and will receive continued support according to the teacher training schedule. Teachers will also participate in NLCs with other BOS teachers using the same curriculum.</li></ol>
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Action Steps and Timeline on the next page.

<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Junior High teachers, Principal, ADD-BOS curriculum and instruction specialist, Facilitator
<b>Resources</b>	Native Knowledge 360, Smithsonian's National Museum of the American Indian <a href="https://americanindian.si.edu/nk360/lessons-resources/search-resources">https://americanindian.si.edu/nk360/lessons-resources/search-resources</a> The site has a search feature for locating cross-disciplinary lesson plans at different grade levels, including Math, Social Studies, and Science.

Action Steps and Timeline on the next page.

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The school budget was reviewed and is currently being adjusted to ensure funding for all school priorities.</li> <li>2. There is room to modify an existing contract to add on a Fine Arts teacher if needed to come into compliance. Action step 2 was modified to refine the action needed to contract a Fine Arts teacher. The date is adjusted to give time for the process of adding a fine arts position to the contracts.</li> <li>3. BIE is currently in the process of contracting with a new facilitator.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not offer a curriculum that includes instructional content in the areas of fine arts and practical arts.
<b>BIE Staff Responsible</b>	Principal, Education Program Administrator, School assigned contracting officer, Facilitator
<b>Resources</b>	These institutions are sources for Native fine arts and practical arts teachers. <a href="#">Institute of American Indian Arts</a> , <a href="#">Northern Arizona University Institute of Native Serving Educators</a> , <a href="#">University of Arizona Indigenous Teacher Education Program</a>

Action Steps	Timeline
1. Review the school budget for the school to fund a contract for a fine arts teacher.	The budget was created on June 30, 2024, and currently adjusting.
2. Examine the school’s master schedule to determine the exact needs and expectations of a Fine Arts teacher. Work to add this position to the existing contract.	March 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The school received enough computers for all students. The inventory has been completed.</li> <li>2. The school purchased a computer literacy program.</li> <li>3. There is not yet a lesson plan component, but the classes are scheduled to work on computer literacy during enrichment time in the master schedule.</li> <li>4. Teachers are currently turning in lesson plans. The expectations will be expanded as teachers receive training.</li> <li>5. The administrator has not started walkthroughs for the 2024-2025 school year.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does offer computer literacy as required instructional content.
<b>BIE Staff Responsible</b>	Principal, IT, Junior High teachers
<b>Resources</b>	<p>Everything You Need to Teach Digital Citizenship  <a href="https://www.commonsense.org/education/digital-citizenship">https://www.commonsense.org/education/digital-citizenship</a>            This K-12 Digital Citizenship Curriculum provides lesson plans by grade level to address timely topics and prepare students to take ownership of their digital lives.</p> <p>Teacher Digital Learning Guide: TEACHING DIGITAL CITIZENSHIP &amp; SAFETY  <a href="https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b">https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b</a>            This guide is designed to provide important resources and recommendations to support teacher implementation of digital learning.</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Conduct an Inventory of working computers on campus	Completed November 2024
2. Work on the School-wide budget to acquire the technology needed to teach computer literacy	Completed June 30, 2024
3. Add computer literacy as a lesson plan component	January 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A Savvas representative was contacted but did not provide the information needed. The school will set up a meeting to discuss but the school SAVVAS rep is currently out on extended leave. The date is adjusted to give time to meet with Savvas and review the curriculum.</li> <li>2. The school counselor is currently teaching the 3<sup>rd</sup>/4<sup>th</sup> grade class due to the assigned teacher being out unexpectedly.</li> <li>3. See # 2</li> <li>4. BIE is currently in the process of contracting with a new facilitator.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not provide core programming to integrate these content areas into the curriculum.
<b>BIE Staff Responsible</b>	Principal, Junior high teachers, School counselor, ADD-BOS curriculum and instruction specialist, Facilitator
<b>Resources</b>	<p>Khan Academy  <a href="https://www.khanacademy.org/">https://www.khanacademy.org/</a>                      Khan Academy offers free online courses and resources that use personalized learning techniques, along with tools designed to support teachers in delivering tailed instruction. There is content on career exploration and orientation, safety and metric education, and consumer economics.</p> <p>NEEF K-12 Environmental Education  <a href="https://www.neefusa.org/what-we-do/k-12-education">https://www.neefusa.org/what-we-do/k-12-education</a>                      NEEF provides a range of K-12 resources designed to support educators in integrating environmental topics into their curriculum, with the aim to foster environmental literacy and inspire students to engage with environmental issues.</p> <p>PBS Learning Media For Teachers  <a href="https://thinktv.pbslearningmedia.org/">https://thinktv.pbslearningmedia.org/</a></p>



	This platform provides a collection of PK-12 educational resources, including videos, lesson plans, and interactive activities aligned with curriculum standards.
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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.	March 2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The contracted physical Education teacher is providing health along with physical education as evidenced in the submitted lesson plans.</li><li>2. The PE teacher is submitting weekly lesson plans and documenting health connections.</li><li>3. The school administrator has not started classroom walkthroughs for the 2024-2025 School year.</li><li>4. The ADD-BOS Behavior Health Specialist is working with Indian Health Services. They have tentatively agreed to health lessons/presentations once per month.</li></ol>
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<b>Initial Assessment Finding</b>	HES does not integrate health education into the curriculum.
<b>BIE Staff Responsible</b>	School contracted PE teacher, HES principal, BOS behavior health coordinator, ADD BOS management analyst
<b>Resources</b>	<p><u><a href="#">KidsHealth in the Classroom</a></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 <a href="https://www.azed.gov/pe/health-education">https://www.azed.gov/pe/health-education</a></p>

Action Steps and Timeline on the next page.

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The student and teacher handbooks were revised in July/August of 2024 and included the uniform grading policy.</li> <li>2. The teachers were given a lesson plan template to follow, and it includes grade-level standards and objectives.</li> <li>3. Teachers are receiving support in this area through Network Learning Communities (NLC).</li> <li>4. Teachers are receiving support in this area from Savvas and NLCs</li> <li>5. This will be ongoing as the school year progresses.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, teachers, ADD-BOS curriculum, and Instruction Specialist.
<b>Resources</b>	<a href="#">Flagstaff Unified School District Standards Based Education Elementary Teacher Handbook</a> The first 15 pages of this handbook outlines grading practices for standards-based education, including components on instruction, learning, evaluation, and reporting.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Review the current student and teacher handbook to identify the current uniform grading policy. Revise as necessary	Completed August 2024
2. Develop a lesson plan template that identifies grade-level objectives.	Completed August 2024
3. Complete the scope and sequence for the school-selected curriculum to identify prescribed objectives.	Ongoing SY 2024-2025
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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The handbooks were reviewed and included information for parents on access to instructional evaluations.</li><li>2. Teachers are keeping assessments in student files. This action step will be monitored during the onsite visits by the compliance specialist.</li><li>3. Evaluation information was shared during parent-teacher conferences from October 28-31, 2024.</li><li>4. This training has not yet been scheduled.</li></ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, Teachers, ADD-BOS curriculum and instruction specialist
<b>Resources</b>	3 Steps to Developing an Asset-Based Approach to Teaching <a href="https://www.edutopia.org/article/3-steps-developing-asset-based-approach-teaching/">https://www.edutopia.org/article/3-steps-developing-asset-based-approach-teaching/</a> This resource provides practical steps to guide educators in using an asset-based approach to teaching and evaluating by focusing on students' strengths.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Review the teacher handbook for expectations on sharing evaluations with students and parents	Completed 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The handbook does address parents' rights to records and the grading policy.</li> <li>2. This action will be monitored during onsite support visits by the compliance specialist.</li> <li>3. Documentation on Parent-teacher conferences will be checked once they have occurred.</li> <li>4. Same as #2 and 3.</li> </ol>
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<b>Initial Assessment Finding</b>	HES is issuing report cards to parents/guardians; however, the report card does not always contain the information required under this requirement.
<b>BIE Staff Responsible</b>	HES principal, teachers, secretary
<b>Resources</b>	

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.	Completed 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-teacher conferences or when parent-teacher conferences are not held.	Ongoing quarterly SY 2024-2025



## 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 the approval documentation 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 approved by the school board and education program administrator.

### Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The handbook does have a grade-level promotion policy that identifies subpart (a) but does not identify subpart (b) as a basis for promotion. This will be reviewed during the summer before the new handbook is approved.</li> <li>2. The policy has been approved by the School Board and Education Program Administrator.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, Education Program Administrator
<b>Resources</b>	<a href="#">Sample Student Promotion Policy: Alachua County Public Schools, Florida</a> This section on Student Promotion and Retention (p. 3-9) provides a comprehensive example of what a promotion policy may look like with minimum criteria on instruction objectives and tests.

Action Steps	Timeline
1. Review the promotion policy in the teacher/student handbooks to ensure it meets the requirements of this regulation to include subpart (b) as part of the promotion requirement.	July 2025
2. Submit to the school board and Education Program Administrator for approval once revised.	November 2024

## 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A contracted librarian has been servicing the school once per week since May 9, 2024. During the School year 2024-2025, she came twice and then resigned from the position. The full-time librarian position was posted and there were applicants. It closed on November 12<sup>th</sup> and the principal is waiting for the certificate of eligible candidates. Adjusted the timeline to allow for the hiring process.</li> <li>2. Library is included in the school's master schedule for the 2024-2025 school year.</li> </ol>
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<b>Initial Assessment Finding</b>	HES has a library but does not offer a library/media program.
<b>BIE Staff Responsible</b>	Principal, Librarian
<b>Resources</b>	<p>American Indian Library Association School Library Resources  <a href="https://ailanet.org/school-library-resources/">https://ailanet.org/school-library-resources/</a>                      This collection from the American Indian Library Association includes booklists, reading programs, library lesson plans, and more resources.</p>

Action Steps	Timeline
1. Hire/contract a librarian to provide library services to all students	February 2025
2. Include the library/media program in the school's master schedule.	Completed 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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. The BIE One Plan has been completed to determine school goals and a program plan was created. This plan was submitted by June 30, 2024, and is now approved.</li><li>2. The school's philosophy has not been reviewed in conjunction with the school board. The timeline will be edited to complete this action.</li><li>3. The questionnaire has not been given at this point in the school year due to not having a librarian. The timeline is adjusted to allow time to hire and train a new librarian.</li><li>4. Not completed due to no librarian. Timeline adjusted to allow time to hire and train a new librarian.</li></ol>
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<b>Initial Assessment Finding</b>	HES does not have a written set of instructional and service objectives. The school has not had a librarian or educational media specialist.
<b>BIE Staff Responsible</b>	Principal, Librarian
<b>Resources</b>	American Association of School Librarians' National School Library Standards <a href="https://standards.aasl.org/administrators/">https://standards.aasl.org/administrators/</a>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Complete the BIE One plan to determine needs, goals, and a program plan for the school.	Completed June 30, 2024
2. Review the philosophy in conjunction with the school board.	March 2025
3. Librarian will solicit feedback from staff and students through a questionnaire.	April 2025
4. Librarian will develop objectives based on the BIE Oneplan, philosophy, and student/staff input.	April 2025

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.

<b>Progress:</b>	The library committee has not been established due to not having a librarian on staff. Timelines are adjusted to give time to hire, onboard and train a new librarian.
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, Librarian, teachers, Facilitator
<b>Resources</b>	<p>American Library Association School Library Selection Criteria  <a href="https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria">https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria</a>            A Selection &amp; Reconsideration Policy Toolkit for Public, School, &amp; Academic Libraries, including the importance of selection policies, basic components of selection policies, and guidelines.</p> <p>American Indian Library Association School Library Resources  <a href="https://ailanet.org/school-library-resources/">https://ailanet.org/school-library-resources/</a>            This collection from the American Indian Library Association includes booklists, reading programs, library lesson plans, and more resources.</p>

Action Steps	Timeline
1. Establish a library committee composed of a librarian, teacher representative, administrator, parent, student, and school board member.	March 2025
2. Develop a written policy for the selection of materials and equipment that meet the regulations in this regulation.	April 2025
3. Send the policy to the school board for approval.	May 2025
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.

<b>Progress:</b>	The school is in the process of hiring a librarian. The action step is adjusted due to no longer being in compliance with this regulation.
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal
<b>Resources</b>	<p>Design Tips for an Elementary Media Center  <a href="https://miencompany.com/5-design-tips-for-an-elementary-media-center/">https://miencompany.com/5-design-tips-for-an-elementary-media-center/</a>                      This blog lists some considerations for an effective school library media center.</p> <p>American Indian Library Association School Library Resources  <a href="https://ailanet.org/school-library-resources/">https://ailanet.org/school-library-resources/</a>                      This collection from the American Indian Library Association includes booklists, reading programs, library lesson plans, and more resources.</p>

Action Steps	Timeline
1. The school will hire or contract a librarian to service the school a minimum of once per week.	March 2025

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The school has not completed an inventory of the library due to not have a librarian on staff.</li> <li>2. The budget was reviewed and created to address library needs. It will be reviewed again for SY 25-26 to account for needs once an inventory is taken.</li> </ol>
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<b>Initial Assessment Finding</b>	HES does not have a librarian, nor have they conducted an annual inventory of available books, materials, and equipment
<b>BIE Staff Responsible</b>	Librarian, principal, and business technician
<b>Resources</b>	<p>American Library Association School Library Selection Criteria  <a href="https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria">https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria</a>            A Selection &amp; Reconsideration Policy Toolkit for Public, School, &amp; Academic Libraries, including the importance of selection policies, basic components of selection policies, and guidelines.</p> <p>How to Inventory the School Library Collection  <a href="https://lookingbackward.edublogs.org/2020/07/15/inventory/">https://lookingbackward.edublogs.org/2020/07/15/inventory/</a>            School librarian describes the inventory process she follows step-by-step.</p>

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.	Completed 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. A textbook review committee has not been established. The timeline will be adjusted to give time to establish a textbook review committee.</li> <li>2. Editing the timeline to complete this action step due to dependency on #1.</li> <li>3. BIE is currently in the process of contracting with a new facilitator.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, teachers, and the Facilitator.
<b>Resources</b>	<p>Greenwich Public Schools Textbook Review Committee  <a href="https://www.greenwickschools.org/teaching-learning/textbook-review-committee">https://www.greenwickschools.org/teaching-learning/textbook-review-committee</a>            Information about Greenwich Public School’s textbook review committee—its purpose, objectives, and process.</p> <p>Guide for Selecting Anti-Bias and Anti-Racist Classroom Texts  <a href="https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf">https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf</a>            Guide which presents considerations and questions to ask when determining if a text is inclusive.</p> <p>American Library Association Selection &amp; Reconsideration Policy Toolkit for Public, School, &amp; Academic Libraries  <a href="https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/committees">https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/committees</a>            Offers guidelines for materials reconsideration committees.</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Establish expectations for the textbook review committee with teachers.	March 2025
2. Teachers will nominate students to be a part of the textbook review committee.	April 2025
3. Work with the facilitator to enlist parents to be a part of the textbook review committee	TBD
4. Facilitator will assist with the school board's appointment of members for the textbook review committee.	TBD
5. Submit the committee to the school board for approval	April 2025

**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.
- The compliance specialist will review the procedure and criteria for the annual review of textbooks on the school SharePoint site to ensure they meet the requirements of this regulation.

**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.

<b>Progress:</b>	The textbook review committee has not been established. The timelines are adjusted to allow time to establish a committee.
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<b>Initial Assessment Finding</b>	HES does not have a textbook review committee as outlined in (a), thus, subsequent requirements cannot be met.
<b>BIE Staff Responsible</b>	Principal, teachers, and Facilitator
<b>Resources</b>	Greenwich Public Schools Textbook Review Committee <a href="https://www.greenwickschools.org/teaching-learning/textbook-review-committee">https://www.greenwickschools.org/teaching-learning/textbook-review-committee</a> Information about Greenwich Public School’s textbook review committee—its purpose, objectives, and process.  Guide for Selecting Anti-Bias and Anti-Racist Classroom Texts <a href="https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf">https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf</a> Guide which presents considerations and questions to ask when determining if a text is inclusive.

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

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 and 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.

<b>Progress:</b>	<ol style="list-style-type: none"><li>1. Teachers were expected to complete an inventory of their assigned classroom. The compliance specialist will check the documentation during the next site support visit.</li><li>2. The inventory is uploaded to the school SharePoint site.</li></ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, teachers, secretary
<b>Resources</b>	SCUSD Classroom Inventory List <a href="https://www.scusd.edu/sites/main/files/file-attachments/classroom_inventory_0.docx?1488308396">https://www.scusd.edu/sites/main/files/file-attachments/classroom_inventory_0.docx?1488308396</a> Example classroom inventory template  Smartsheet Classroom Inventory List <a href="https://www.smartsheet.com/sites/default/files/2021-12/IC-Classroom-Inventory-List-11262.xlsx">https://www.smartsheet.com/sites/default/files/2021-12/IC-Classroom-Inventory-List-11262.xlsx</a> Blank classroom inventory list spreadsheet

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Teachers will inventory all textbooks, property, and equipment in their assigned classroom.	Completed 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 the 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>The School Principal has taken over with test coordinator duties due to the school not having a counselor.</li> <li>The School Counselor has been assigned to teach the 3-4<sup>th</sup> grade class temporarily due to the teacher unexpectedly being out. This work may be delayed. The new counselor starts on December 16th</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal and counselor
<b>Resources</b>	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 2024-2025
2. Counselor and principal will work together to review/create a testing plan for HES.	January 2025

**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.

<b>Progress:</b>	Due to the school counselor being detailed to teach all school year, this work is delayed. The principal has taken over many of the test coordination duties. The timelines are adjusted to account for the transition of duties.
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal and counselor
<b>Resources</b>	BIE Chief Academic office

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.	February 2025
2. School will Send home a copy of the test assessment scores with a letter explaining the results.	Sent to parents
3. Test scores will be reviewed with parents during the first parent-teacher conference.	End of 1st quarter October 23rd
4. Review current school testing protocols for potential revision to ensure the reliability and validity of test scores.	February 2025
5. 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.	February 2025



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.

<b>Progress:</b>	<p>1. HES has a written referral procedure and related documents. Staff were trained on this process by the ADD-BOS Behavior Health Specialist on August 12<sup>th</sup>.</p> <p>Due to the school counselor being detailed to teach all school year, this work is delayed. The principal has taken over many of the test coordination duties. The timelines are adjusted to account for the transition of duties.</p>
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<b>Initial Assessment Finding</b>	HES has a counseling program but does not have documented procedures, processes, or clear expectations.
<b>BIE Staff Responsible</b>	School counselor, Principal, ADD BOS behavior Health specialist, and Facilitator.
<b>Resources</b>	<p>Micro-Course            Indigenous Pathways in Planning for College, Career, and Community Life  <a href="https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/">https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/</a></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 <a href="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/">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/</a></p> <p>Brief Missing More Than School: Reducing Chronic Absence for American Indian and Alaska Native Students <a href="https://weeac.wested.org/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/</a></p> <p>Brief Discipline Equity for American Indian and Alaska Native Students: Recommendations for District Leaders <a href="https://weeac.wested.org/resource/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/</a></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.	Completed September 2024
2. School counselor EPAP (Employee Performance appraisal plan) will be adjusted to include the requirements of this regulation.	February 2025
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.	TBD
4. School counselor will develop documentation systems for tracking student services and activities.	March 2025
5. School principal will work with the counseling program to assess the program's needs to acquire items such as file cabinets.	March 2025

## 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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. ADD-BOS Management analyst is working to support the school by creating an activities interest questionnaire.</li> <li>2. HES did begin activities in March 2024. The stipend list for activity sponsors had already been approved for SY 2024-2025. Activity guidelines are in the staff handbook and were reviewed with staff during staff orientation. This action step and timeline has been modified to reflect subpart (b) for each activity.</li> <li>3. BIE is currently in the process of contracting with a new facilitator.</li> <li>4. The stipend list has been approved, but overall activity plans should be submitted for approval. Action step and timeline has been modified.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Principal, teachers, and Facilitator
<b>Resources</b>	These resources from Illinois describe ways to start an afterschool program. <a href="https://actnowillinois.org/professional-development-resources/starting-an-afterschool-program/">https://actnowillinois.org/professional-development-resources/starting-an-afterschool-program/</a>

Action Steps	Timeline
1. Develop and administer an activities interest questionnaire for students.	February 2025
2. Each activity sponsor will create and submit to the school principal a student activity operation plan.	February 2025
3. With the assistance of the Facilitator, identify community and tribal resources for cultural activities.	TBD
4. Submit the operation plans for approval to the school board.	February 2025
5. Principal will give Orientation and training for all staff who will be an activity sponsor with a sign-in acknowledging responsibilities.	February 2025

## 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.

<b>Progress:</b>	1. The monitoring lead has been identified by the Chief performance office.
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<b>Initial Assessment Finding</b>	The Director’s office has not monitored and evaluated the conformance of HES within the requirement of this part, fully.
<b>BIE Staff Responsible</b>	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
<b>Resources</b>	

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.

<b>Progress:</b>	<ol style="list-style-type: none"> <li>1. The monitoring lead has been identified by the Chief performance office.</li> <li>2. School Board is now active and will be part of the process.</li> </ol>
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
<b>Resources</b>	

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

<b>Progress:</b>	1. BIE is currently working with West Ed to examine monitoring processes. They assist in documenting processes and adjusting them as needed.
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<b>Initial Assessment Finding</b>	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.
<b>BIE Staff Responsible</b>	BOS-ADD, Education Program Administrator, Principal
<b>Resources</b>	

<b>Action Steps</b>	<b>Timeline</b>
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

## Index

### 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.