



NATIONAL INDIAN EDUCATION ASSOCIATION

NATIONAL CONGRESS OF AMERICAN INDIANS

**Joint Organizational Comments on the
Indian Education Study Group
Strategic Plan for Reform**

**United States Department of the Interior
Bureau of Indian Education**

June 2, 2014

The National Indian Education Association (NIEA) was privileged to testify last year before the House of Representatives' Appropriations Subcommittee on Interior, Environment, and Related Agencies regarding the disparate state of Native education within the Department of the Interior (DOI). NIEA testified last month before the Senate Committee on Indian Affairs regarding measures needed to improve the ability of the Bureau of Indian Education (BIE) to serve Indian students. We are enthusiastic, but appropriately cautious, about the renewed focus and efforts of the Administration to reform the failing school system. The following comments and recommendations are reflective of that restraint and should be taken into account as DOI initiates reform. The National Congress of American Indians (NCAI) is also happy to join NIEA's comments and recommendations as a proud partner working to ensure Indian Country's children are afforded a quality educational experience that will shape the future leaders of Indian Country.

NIEA, founded in 1969, is the most inclusive Native organization in the country—representing Native students, educators, families, communities, and tribes. NIEA's mission is to advance comprehensive educational opportunities for all American Indians, Alaska Natives, and Native Hawaiians throughout the United States. From communities in Hawaii, to tribal reservations across the continental U.S., to villages in Alaska and urban communities in major cities, NIEA has the most reach of any Native education organization in the country.

The National Congress of American Indians (NCAI), founded in 1944, is the oldest, largest, and most representative American Indian and Alaska Native organization serving the broad interests of tribal governments and communities. NCAI is a consensus-driven organization that advocates for a bright future for generations to come by taking the lead to gain consensus on a constructive and promising vision for Indian Country. NCAI is committed to ensuring that American Indian and Alaska Native students have the best educational opportunities possible, including access to a quality education system that respects and addresses their unique cultural and linguistic needs. For nearly seven decades since its founding, NCAI has remained true to the original purpose of the organization: to be the unified voice of tribal nations.

Native Education Crisis Due to Federal Mismanagement

Native education is in a state of emergency partly due to the inability of the federal government to uphold its trust responsibility. As Interior Secretary Sally Jewell has stated, "Indian education is an embarrassment to you and to us. It is not for the lack of desire. This [the BIE] is the one part of the Department of the Interior that deals directly with services to children. We know that

self-determination and self-governance is going to play an important role in bringing the kind of academically rigorous and culturally appropriate education that children need...”¹ Unfortunately, the BIE has been consistently unable to educate Indian children and support tribal self-determination. As a result, Native students lag behind their peers on every educational indicator, from academic achievement to high school and college graduation rates. Just over 50% of Native students are graduating high school, compared to nearly 80% for the majority population. For students attending BIE schools, rates are even lower. According to the latest results from the National Assessment of Educational Progress (NAEP), BIE schools are among the worst performing in the nation. The federal government’s continued inadequacy in directly educating our students hinders our children from developing a strong education foundation that prepares them for future success.

Native Student Demographics Snapshot²

- 378,000, or 93% of Native students, attend U.S. public schools, with the remainder attending federally-funded BIE schools, tribally-operated schools, and charter schools.
- As of the 2011-2012 school year, there are 183 Bureau-funded elementary and secondary schools, located in 23 states, serving approximately 41,051 Indian students.
- Of all Native students, 33% live in poverty, compared to 12% of Whites (2011-2012 school year).
- 29% of these students attend high-poverty city public schools, compared to 6% of Whites (2009-10 school year).
- Only 52% of Native students live in two-parent households, compared to 75% of Whites (2011).
- After the most recent census, only 65,356 Natives ages 25 years and older had a graduate or professional degree.

The Trust Responsibility to Native Education

Our organizations’ work for decades has centered on reversing these negative trends. We are making sure our communities have the future leaders needed to help tribes thrive as well as preserve and strengthen local cultural and linguistic traditions. This begins by providing our future generations’ equal educational opportunities that prepare them for academic success no matter where they attend school – BIE, tribal grant and contract, charter, or public. As tribes work to increase their footprint in education, there must be support for that increased participation. The federal government must uphold its trust responsibility. Established through treaties, federal law, and U.S. Supreme Court decisions, this responsibility includes a fiduciary obligation to provide parity in access and equal resources to all American Indian and Alaska Native students.

Bureau of Indian Education Reform through Tribal Consultation

For too many years, DOI has made other programs under its purview priorities while Native education programs and the BIE were considered afterthoughts. In addition to the 2012 Bronner Report and Government Accountability Office (GAO) Reports on the BIE, statistics continue to highlight the inability of the BIE to successfully educate Native students. To address the BIE, Secretaries Sally Jewell and Arne Duncan in the Departments of the Interior and Education (ED)

¹ Hearing Before the Committee on Indian Affairs United States Senate. May 15, 2013. “Receiving the Views and Priorities of Interior Secretary Sally Jewell with Regard to Matters of Indian Affairs.” U.S. Government Printing Office. Washington. 2013. (9).

² National Center for Education Statistics, Institute of Education Sciences, United States Department of Education. National Indian Education Study. 2011. (NCES 2012-466). <http://nces.ed.gov/nationsreportcard/nies/>
NIEA NCAI Joint BIE Strategic Plan Comments

created the American Indian Education Study Group (Study Group) to analyze persisting issues and develop solutions. As educational achievement gaps widen for Native students, it has never been more important to fix the broken system.

NIEA and NCAI are enthusiastic about the Study Group's work and support the principals outlined in the strategic plan. It has numerous good ideas and is a result of hard work and a long overdue focus on the BIE from Congress and the Administration. However, much work lies ahead. Through our discussions with tribes and tribally-controlled school administrators and educators, it is clear that there is unhappiness, skepticism, and confusion regarding the Study Group's strategic plan. Tribes are already disappointed in the Study Group's inability to provide appropriate time for consultations, which is necessary to ensure meaningful dialogue in the development of the reform measure. Tribes have repeatedly expressed concern that this measure could create increased bureaucracy in Washington. While it focuses on creating local, tribal capacity to deliver education services, the report appears to be the result of a top-down approach with little regard for tribal input. Such perceptions must be addressed to ensure successful reform.

Reform is unattainable unless the Study Group works with and adequately incorporates the views and local needs of tribes. As the Study Group continues its work, NIEA and NCAI respectfully request another round of tribal consultation sessions after it has incorporated the prerogatives outlined during this open comment period. Transparency and active collaboration is crucial for garnering tribal support and providing a means for tribal participation. While we recognize that time is of the essence as this Administration comes to the end of its second term, tribes have seen top-level BIE reform efforts fail in the past. To succeed, this plan must address the needs of tribes and take concrete steps to implement the proposed changes provided from tribes and tribally-run schools in order to support their education systems, while also decreasing bureaucracy and inefficiency.

Tribes and their representatives must have the ability to meaningfully consult on an updated report that takes into account their recommendations. They should also have the opportunity to analyze any proposals set on altering appropriation levels, legislation, or regulation. Goals and outcomes are necessary, but tribes and Native education stakeholders must have the means to review draft language or specific policy and budget recommendations to ensure compliance with tribal self-determination and the Tribally Controlled Schools Act.

Recommendations to Improve the Bureau of Indian Education

The BIE's mission, as stated in Title 25 CFR Part 32.3, is to provide quality education opportunities from early childhood through life in accordance with a tribe's needs for cultural and economic well-being, in keeping with the wide diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities. The BIE is to manifest consideration of the whole person by taking into account the spiritual, mental, physical, and cultural aspects of the individual within his or her family and tribal or village context.

Unfortunately, the BIE is failing its mission by inadequately educating our children. Reform, without abrogating the federal trust responsibility and treaty obligations, is needed within DOI. Agency reform should begin locally in BIE schools and at the discretion of tribal leaders and Native education stakeholders. To ensure the support of our communities, the federal

government must work with tribal leaders and their experts in order to ensure systemic change addresses the concerns and prerogatives tribes have called for over the last several decades.

Tribally controlled contract and grant schools are the future of Indian education and as such, those institutions of self-determination must be supported based on local needs, not at the direction of the Department or the Administration. The following recommendations and suggestions are based on resolutions passed by our membership as well as through local work with tribal leaders, educators and administrators of tribally-run schools, and tribal communities.

I. Strengthen Tribal Self-Determination

The federal government implemented assimilation and termination policies in the 19th and 20th Centuries by breaking down traditional family patterns in tribal communities and forbidding the use of cultural traditions. Education systems, such as boarding schools, supported these efforts and restricted traditional family structures. The United States then separated Native children from their parents and tribal families in order to destroy cultural kinship. Through these systems, the U.S. robbed tribes of their ability to educate their children.

As tribes fought and achieved the ability to once again exercise their inherent rights as sovereign governments in the latter 20th Century, tribes began contracting with the Bureau of Indian Affairs (BIA) to administer education functions under the Indian Self-Determination and Education Assistance Act of 1975 (P.L. 93-638). However, as a result of history and legal statutes, the federal government had positioned itself as the direct education provider for many tribal communities. Through this context, the federal government created the inability of BIE reform to succeed internally because the system functioned and continues to operate under a model rooted in outdated practices that often run counter to tribal self-determination.

Precedence of Self-Determination

Even as tribes reasserted their ability to perform some education functions under federal statute, such as the Tribally Controlled Schools Act of 1988, other legal barriers such as those under Public Law 107-110, the Elementary and Secondary Education Act (ESEA), continue to drive the Bureau's means for working with tribes, families, and students. As a result, BIE schools working with local communities have developed an internal bureaucratic mentality that tribes often work to support local Bureau schools rather than BIE schools serving tribes.

NIEA and NCAI are glad to see that the BIE strategic plan looks to increase collaboration with and support of tribes in their efforts to increase self-determination in education, rather than dictating local educational policy on tribal communities. To facilitate the critical reform that is needed, DOI and the BIE within it, must use actions, not words, by providing the tools and resources necessary for supporting tribes as they administer education functions.

The report says the BIE will transition from running schools to serving tribes. However, the BIE must ensure it has the ability to continue serving tribes who decide their trust principles would be violated if the agency forces a tribe to assume operational responsibility of a former BIE school. The Interior Department has a poor record of support for tribal assumption of BIE schools and must assist tribes as they work to build capacity or provide the necessary services to tribes who wish to be served by other means. Congressional and internal support from DOI must equate to increased budgetary requests for BIE and tribes for administering educational services. More detail in the report is necessary for providing such support, such as utilizing an "integrated

management system,” as the report currently gives little information for how the BIE will use such tools to successfully meet the needs of all tribes.

II. Support and Strengthen Native Language and Culture

Common Core State Standards

Native language revitalization and preservation is a critical priority to tribes and Native communities because language preservation goes to the heart of Native identity. In many ways, language is culture. Learning and understanding traditional languages helps Native students thrive and is a critical piece to ensuring the BIE is serving our communities effectively. As a means to support local language and cultural immersion, the BIE should explain in further detail how it would support culturally-relevant Common Core State Standards (CCSS) implementation efforts.

BIE schools often operate in a vacuum apart from other local schools serving a tribe. Since Native students travel between the public, BIE, charter, and tribal contracted or grant schools in their communities, the BIE should work with local non-BIE school systems, tribes, and their education agencies to ensure school calendars, professional development, and CCSS curriculum implementation support one another and provide consistency for Native students.

Teacher Recruitment and Retention

The high rate of teacher turnover in Native-serving schools continues to negatively impact student learning. Local teachers must understand the culture and language of their students in order to adequately address student needs. The BIE should help tribes and tribally-run schools administer immersion programs and ensure stability among the teacher workforce. The report should provide a detailed analysis and proposed recommendations for addressing such things as the education, experience, retention and turnover rates, as well as effectiveness of tribal-serving teachers.

The report should also make note of any differences between teachers in BIE-operated schools and tribally-operated schools as well as describe teacher compensation at BIE-operated and tribally-run schools and the availability of decent housing for school employees from outside the local Indian community. The Study Group should also provide concrete steps, such as offering premium pay and housing, or preparing local tribal citizens to teach, in order to assist schools having trouble recruiting and retaining experienced teachers and administrators.

Expansion of Language Immersion and Congressional Intent

Immersion programs not only increase academic achievement, but also guarantee that a student’s language will be carried forward for generations. Our communities’ unique cultural and linguistic traditions are crucial for the success of our students and are critical cornerstones for providing relevant and high quality instruction as part of an education that ensures Native students attain the same level of academic achievement as the majority of students. NIEA and NCAI request the BIE ensure that reform strengthens the ability of the federal government to support tribes in the delivery of culturally-relevant curricula.

NIEA and NCAI support expanding immersion opportunities in BIE supported schools. P.L. 100-297, Tribally Controlled Grant Schools Act, and P.L. 93-638, Indian Self Determination and Education Assistance Act, as well as P.L. 109-394, Esther Martinez Native American Languages Preservation Act of 2006, promote a policy of both self-determination and investment in Native

languages—specifically language immersion schools. Further, the White House Initiative on American Indian and Alaska Native Education promises to support expanding opportunities and improving outcomes for Native students by promoting education in Native languages and histories.

NIEA and NCAI acknowledge that exemplary immersion models, such as those at Niigaane Ojibwemovin Immersion Program and School serving the Leech Lake Band of Ojibwe and Rough Rock Community School serving the Navajo Nation, have won the prestigious NIEA cultural freedom award for their efforts in full-day language immersion. However, federal agency interpretation and administrative procedures often restrict tribes from running schools, such as Niigaane and Rough Rock, by creating barriers to tribal self-determination. To begin addressing this issue, NIEA and NCAI request that congressional intent of legal statutes, rather than agency interpretation, be utilized so that tribes can deliver effective education programs.

III. BIE Internal Reform

BIE as a Technical Service Provider

As the Administration progresses its reform agenda with the BIE strategic plan, it should work with tribes and Congress to ensure the BIE has the necessary support to become a technical assistance provider as outlined in the report. If the BIE is to become an entity that assists tribes who wish to participate in the delivery of their children's education, then support is needed in Washington, D.C and locally. Since the late 20th Century, Congress and presidential administrations have worked to strengthen tribal capacity to directly serve their citizens in other services. In this spirit, tribes should have the same ability as state and local education agencies to administer education.

NIEA and NCAI are happy to see that the plan calls for the BIE to end its era of failed education delivery. Becoming an entity similar to a Regional Educational Laboratory (REL) would, rather than providing direct education to Native students, strengthen the ability of the BIE to work in partnership with tribes, tribal colleges and universities, school districts, and state departments of education. However, as the BIE shifts its focus, it must consult with tribes to become a technical and best practices provider that collects and utilizes data and research focused on addressing local issues and tribal needs for improving the academic outcomes of Native students.

BIE Capacity Transition

In order to successfully reform the BIE into a technical provider and capacity builder, DOI and the BIE staff need a fundamental shift in thinking. Some staff at the BIE have served their communities for decades, which builds experience and expertise. However, that expertise is based on a flawed and outdated model that has yet to decrease the achievement gap among our students and the majority population. NIEA and NCAI suggest that DOI work with tribes to develop models for ensuring educators and administrators understand the needs of their local Native communities and that educators are prepared to accordingly engage and work with tribes and their education agencies.

BIE reform should not be an internal, Bureau-wide capacity building effort set on hiring an influx of new thought leaders in Washington. Rather, we need a change in capacity and a restructuring that supports community collaborators who will sit with a principal chief in Oklahoma or a pueblo governor in New Mexico to find solutions to local problems. Simply, we need the right people in the right positions supporting tribal capacity to administer education

services. Tribal leaders understand their children best and tribal communities can better address a child's unique educational and cultural needs. Rather than directly educating Native students, the BIE should be situated to provide support services to tribal leaders and education agencies, similar to the Indian Health Service's (IHS) relationship with tribes as they administer health services.

IV. BIE Funding

As tribes work with Congress and the Administration to reform education institutions and increase tribal responsibility in administering education, federal leaders should also increase treaty-based appropriation levels and requests for tribal governments and Native education institutions. Historical funding trends illustrate that the federal government is abandoning its trust responsibility by decreasing federal funds to Native-serving programs by more than half in the last 30 years. These shortfalls persistently affect the ability of the BIE to provide transportation services, construct new buildings, and effectively educate Native students. These issues would be unacceptable in any other school system and must be addressed now if we are to systemically improve the BIE's ability to serve our communities and strengthen self-determination.

BIE Budget Authority

For too long, budgetary fragmentation and bureaucratic issues between the BIA and the BIE have decreased the ability of the BIE to meet the educational needs of our youth. Congress and federal agencies should fund Native education programs that strengthen tribal self-determination and tribal education agencies to ensure adequate resources are appropriated to the BIE in order to address tribal concerns and needed systemic changes.

As a result of BIA authority over the BIE budget, the BIE is often low in priority when compared to other programs. Recently, internal BIA FY 2014 Operating Plan reallocations reduced BIE Johnson O'Malley Assistance Grants by \$170,000 as well as cut BIE higher education scholarships. While the reduced lines were under tribal priority allocations, such reductions were not authorized by tribal leaders but were a result of internal redistributions in the agency. Although the reductions are small as compared to the overall increase in the BIA budgets after Congress postponed sequestration, rescissions without appropriate consultation are unacceptable.

NIEA and NCAI are open to discussing the idea of transferring budget authority from the BIA to the BIE if it increases efficiency and effectiveness by decreasing the bureaucracy inhibiting funds from positively impacting Native students and tribal self-determination. This does not mean duplicating budget management, but providing the BIE the necessary means to administer funds to areas of need. However, the BIE must work in concert with tribal leaders and fund programs based on tribal priorities and funding formulas in order to ensure equity among schools.

The report should provide an historical and present funding analysis for the BIE, focusing on budget proposals originating within the BIE, budget challenges within the Administration's internal budget formulation process, and illustrations for how budget proposals fared in Congress. Providing examples should explain continuing need to develop internal budget authority apart from the BIA. If the BIE is determined to be in need of autonomy from the BIA, we reiterate that tribes must have appropriate and formal avenues to provide their budget priorities to the BIE, DOI, and the White House Office of Management and Budget (OMB). The

Administration should not shift critical formula funds or budget priorities that provide equity among BIE schools unless such budget alterations are supported by tribes.

BIE Grant Pilot

As the BIE works to support tribes and their education agencies, BIE reform could be strengthened by providing funds for a competitive grant pilot that incentivizes capacity building in tribally-controlled grant and contract schools. This grant program could be modeled on best practices from existing competitive grants in use within the Department of Education. For \$3 million, the BIE could administer a pilot to spur urgent and abrupt systemic reform that would substantially improve student success, close achievement gaps, improve high school graduation rates, and prepare students for success in college and careers.

The three-year competitive incentive-based grant, similar to existing Race to the Top initiatives for which BIE continues to be excluded, could provide much-needed resources to tribes for accelerating local reforms and aligning education services to tribal education priorities that include language and culture. Further, performance metrics for the grant could include student attendance rates, graduation rates, college enrollment rates, and measures on educator accountability. In order to catalyze reform efforts and create a set of high-performing, tribally-controlled grant schools, the BIE could also provide on-going technical assistance to build the capacity of those schools that applied for, but did not receive, a grant.

It is important to note that a competitive grant idea has garnered some opposition in remarks from tribes. To address this, such a competition should not replace existing funds from other much-needed programs. A competition should be a means for providing equity for the BIE with other high-need school systems currently eligible for initiatives, such as Race to the Top. Such a pilot would provide examples for best practices to other BIE and tribally-operated schools. While NIEA and NCAI support equity for the BIE in federal funding initiatives, this is an idea that should be discussed further to provide additional details to tribal leaders and their technical experts and only pursued at the expression of general tribal support.

Tribal Grant Support Costs

This year, Congress and the Administration fully funded IHS and BIA contract support costs under self-determination and self-governance contracts and compacts. However, Public Law 100-297 grant or Public Law 93-638 self-determination contracted BIE schools were exempt from full funding, which will result in budget shortfalls. Full funding for Tribal Grant Support Costs in FY 2015 and subsequent years is just as important as full funding for Contract Support Costs as these dollars help tribes expand self-determination and tribal authority over education programs by providing funds for administrative costs, such as accounting, payroll, and other legal requirements.

The BIA currently funds only 65 percent of support costs in the 126 tribally managed schools and residential facilities under the BIE purview. This forces the schools to divert critical classroom education funding in order to cover unpaid operational costs, which make it unrealistic to improve educational outcomes and bridge the achievement gap among Native and non-Native students. To support Tribal Grant Support Costs, the report should account for the current situation and include consideration of the input provided by tribal and school representatives on the impact of Tribal Grant Support Costs funded at levels far below the formula mandated in the law.

The report should also propose ideas to address continuing need for transportation appropriations and construction funding. While the report addresses the need to maintain a safe learning environment for students, it does not include school replacement construction in that section. Providing Native students a structurally-sound facility is the first step to providing a safe learning environment and the report should provide recommendations for addressing such concerns. The BIE and the Department of Defense Education Agency (DoDEA) run a similar number of schools (183 for BIE, as compared to 190 at DoDEA). However, the DoDEA was appropriated \$3.7 billion for school replacement, which it completed in a nine-year plan. The BIE cites a \$1.3 billion figure in the report that is based on an outdated school replacement list. There must be adequate internal review of school construction need and appropriate support from the Administration for addressing replacement construction.

Connect BIE Schools to Educate

The President's goal in the ConnectED Initiative is to connect 99 percent of America's students to the Internet through high-speed broadband by 2018. Unfortunately, tribal areas are already far behind their counterparts due to geographical isolation, ineligibility, and inadequate capacity to apply for funds. The Federal Communications Commission (FCC) is one of the primary entities leading the implementation of the President's ConnectED initiative. As a regulatory entity, the FCC develops rules to manage the Universal Service Fund (USF), which provides subsidies for various telecommunications services. One program component of the USF is the E-rate Program, which provides funding for the deployment of telecommunications services to the nation's schools and libraries.

Since last year, the FCC has been developing proposals and receiving recommendations on modernization of the E-rate program in order to support broadband speed capacities and technologies. However, the BIE recently reported 130 to 140 BIE schools applied for and received E-rate funds over the last nine years—out of a total 183 BIE entities. Out of the E-rate funds committed for these BIE schools over the past nine years, only 60 percent was actually spent. Furthermore, many eligible BIE schools did not apply because they did not meet the 80% threshold to receive a discount.

These statistics illustrate persistent gaps in E-rate adoption among BIE schools that are similarly prevalent in other Native-serving institutions due to their geographical isolation and inability to meet Universal Service Administrative Company (USAC) guidelines. If BIE schools are, on average, spending just 60 percent of E-rate awarded funds then there should be further collaboration among Congress, the FCC, and BIE to ascertain these reasons and work to ensure BIE schools are receiving critical E-rate funds to connect next generation technologies and broadband speeds.

We must work together to make sure tribes and Native-serving schools benefit under this initiative. Limited data already suggests overall connectivity funding for schools and libraries on tribal lands is disproportionately low and inadequate for connectivity. To prevent tribal nations and their citizens from becoming the one percent that remains disconnected, BIE reform must include coordination efforts with the FCC and tribes to decrease barriers that hinder tribal and BIE participation in the E-rate program and 21st Century education.

V. Elevate Native Education

Deputy Assistant Secretary of Indian Education

Tribes have spoken loudly that Indian education belongs within the Department of the Interior in order to ensure the federal trust responsibility is upheld. Unfortunately, DOI continues to fail at including education experts and educators in key policy and budget decisions. As we work to find ways to increase the effectiveness of the BIE and improve the state of Native education, we must have people leading in Washington who understand the needs of our students and have the authority to drive successful reform.

Tribes and our students require a federal leader who has the ability to address colleagues and the President on the federal government's trust responsibility to Native education. We request the Administration support the creation of a Deputy Assistant Secretary of Indian Education in order to elevate the needs of our students. While the report mentions the need to formulate an office focused on strengthening self-determination, NIEA and NCAI do not support a large increase in bureaucracy that hinders local efficiency. However, there should be an advocate in DOI that works with tribes at an elevated level to ensure our children become the highest-achieving students in the country and that the BIE is supporting tribes who are operating state of the art schools.

DOI Tribal Education Budget Council

To support BIE budget autonomy and tribal negotiations, we also request that BIE reform include the creation of a Tribal Education Budget Council that functions similar to the Tribal Interior Budget Council and is presided by tribal leaders and the newly created Deputy Assistant Secretary of Indian Education position. This would help guarantee that education issues do not fall in priority. Tribal leaders are often forced to choose between issues and focus on providing for present-day emergency measures, such as fire prevention resources or critical medical funds, as compared to long-term preventative solutions in education. Providing equity to education and a venue to address our students' needs is crucial to elevating Native education and ensuring that persistent issues are addressed.

Conclusion

NIEA and NCAI share your commitment to tribal education and we look forward to working closely with the Administration and the Study Group as this reform proposal moves forward. Strengthening our partnership will ensure all tribal-serving schools are as effective as possible and that tribes have more access to administer education services. We must make sure BIE has the tools necessary to improve and assist tribes in providing services to tribal citizens, but only if that is supported by the local community. This effort cannot be a top-down approach, but a measure created through grassroots support at the tribal level, which requires additional consultations and outreach. Tribes have expressed that this current proposal for BIE reform, while well intentioned, was not a direct result of meaningful consultation.

We appreciate the efforts and ideas within the BIE strategic plan, but without tribal support and local collaboration, we cannot expect BIE reform to succeed. Only by working with all stakeholders in all education systems will we increase the ability of the BIE to work with tribes and expand our students' preparedness for success. Once again, thank you for this opportunity and if you have any questions regarding these comments on BIE reform, please contact Ahniwake Rose, NIEA Executive Director, at arose@niea.org, or Jacqueline Johnson Pata, NCAI Executive Director, at jpata@ncai.org.