



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

RE-ISSUING REVIEW OF ACADEMIC ACHIEVEMENT AT THE SAN ILDEFONSO DAY SCHOOL



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Memorandum

To: Ms. Julianna Trujillo
Principal, San Ildefonso Day School

From: Mary L. Kendall *Mary L. Kendall*
Deputy Inspector General

Subject: Re-issuing Inspection Report – Review of Academic Achievement at the San
Ildefonso Day School
Report No. C-IS-BIE-0038-2014

This memorandum transmits an update to one of the findings in our inspection report concerning academic achievement efforts at the San Ildefonso Day School. In our report issued December 3, 2015, we stated that San Ildefonso Day School did not have a comprehensive needs assessment and recommended that the school complete one. We also suggested a number of elements that should be included in an assessment and requested that the school provide us with a written response to the report, including information on actions taken or planned to address the report recommendations.

In their response, school officials reported that a comprehensive needs assessment had been conducted for the 2013/2014 school year. We asked for, and were provided, a copy of the assessment the school had conducted and confirmed that school officials had indeed completed an assessment prior to our site visit. Unfortunately, this information was not provided to us by the acting principal when we requested it during our school visit in May 2014. Neither was it mentioned during our exit conference when we reviewed our findings with current school officials.

We have reviewed the new information and updated the inspection report accordingly. While our finding that the school had not conducted a comprehensive needs assessment has changed, our recommendation for the school remains essentially the same in that we encourage the school to update the assessment to include the suggested elements.

If you have any further questions or need further information, please contact Kimberly Elmore, Assistant Inspector General, Office of Audits, Inspections, and Evaluations, at 202-208-5745, or Stefani Levesque, Evaluator, at 303-236-9241. The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

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Results in Brief

We found opportunities for improvement in how the San Ildefonso Day School assesses the academic needs of its students. The No Child Left Behind Act, signed into law in January 2002, requires schools to complete a comprehensive needs assessment. The purpose of the assessment is to provide the schools with a strategy to help them meet the specific needs of their unique student populations. Completion of the assessment involves—

- systematic identification of strengths and needs in eight areas;
- examination of the nature and cause of each identified need; and
- prioritization of each need, or the cause of that need, for future action.

We found that San Ildefonso Day School, a Bureau of Indian Education (BIE)-operated day school located on the San Ildefonso Pueblo, 15 miles north of Santa Fe, NM, had a comprehensive needs assessment that did not address some critical areas. Since the assessment was not complete, the specific needs of the school's unique student population may be unknown to school administrators, leaving the school unable to effectively prioritize its resources to ensure the successful educational achievement of its student population.

In addition, school children may have mastered conversational English but may not be able to express themselves effectively using academic English, the formal written, auditory, and visual language used in learning environments. All states require some type of English language learner (ELL) assessment that ranges from simply asking parents to identify the primary language spoken in the home to a formal test administered to all students. We found that San Ildefonso Day School officials had administered ELL assessments. All students however, were combined into classrooms under three teachers, regardless of their assessment outcomes. As a result, ELL students may not have received the additional support necessary to help them achieve academically.

We make two recommendations that, if implemented, should improve educational achievement efforts at the San Ildefonso Day School.

Introduction

Objective

Our objective was to evaluate the programs in place to improve educational achievement at schools funded by the Bureau of Indian Education (BIE). We chose to focus on how BIE worked to close the educational achievement gap and increase the graduation rate. This report specifically addresses whether San Ildefonso Day School: 1) completed a comprehensive needs assessment for the 2013/2014 school year; and 2) incorporates cultural awareness and language assessment in its education program. The scope and methodology for this inspection are included in Appendix 1.

Background

Concerns in Indian Education

In May 2013, Secretary Jewell appeared before the Senate Committee on Indian Affairs to discuss Department of the Interior (DOI) priorities in Indian country. Among other issues raised, Committee members expressed concerns about academic achievement at BIE-funded Indian schools. Academic achievement concerns generally fall into one of two broad areas, the achievement gap and graduation rates.

1. **Achievement Gap** - Standardized achievement tests, designed to measure an individual student's knowledge and skill as an indicator of academic progress, are given to students in both public and BIE-funded schools. In general, BIE students lag behind the public school population. Research has found that, as early as grade 4, students attending BIE-funded schools achieve test results below those of their public school counterparts. Furthermore, the higher the grade level, the greater the gap in test scores. For example, if a student reaches grade 12 in a BIE-funded school, that student may be testing at the grade 9 level, while a public school counterpart generally will be testing at the grade 12 level.
2. **Graduation Rates** - BIE calculates graduation rates based on guidance from the Department of Education on a 4-year adjusted cohort or group of statistically similar students, in this case those who entered grade 9 at the same time and stayed in the same school they entered. Cohort numbers may only change by adding students who transfer in later during that same year or over the next 3 years, or by subtracting students who transfer out during that same period as long as the school has documentation supporting where the student has reenrolled. The public school graduation rate averages roughly 76 percent, while the average graduation rate from BIE-funded schools is below 50 percent.

Federal Efforts to Improve Indian Education

Federal laws attempt to provide resources to help improve educational opportunities for all students. The Elementary and Secondary School Act of 1965 was enacted to ensure that all children have fair and equal opportunities to obtain a high-quality education and reach, at a minimum, proficiency on academic achievement assessments. The Act also aimed to help close the achievement gap between high and low achieving students, especially achievement gaps between minority and nonminority students, and between disadvantaged children and their more advantaged peers. It also authorized that funds be made available to meet the unique educational needs of Indian students. The No Child Left Behind Act of 2002 was a reauthorization of the Elementary and Secondary School Act of 1965 and has the same stated purpose of improving academic achievement.

Executive Order 13592, signed by President Obama in December 2011, aimed to close the achievement gap and increase the graduation rate for students by improving educational opportunities for Indian and Alaska Native students, including those attending BIE-funded schools. The executive order specifically promoted efforts to—

- increase kindergarten readiness;
- expand access to college support services;
- increase teacher recruitment in science, technology, engineering, and mathematics (STEM programs); language; and special education subjects;
- support innovative dropout prevention strategies;
- implement pathways for dropouts and adults to reenter education;
- increase college access; and
- meet unique cultural and language needs.

Schools Funded by BIE

BIE provides funds to approximately 185 schools that serve Indian student populations in 23 states. These schools included 119 day schools, 52 boarding schools, and 14 peripheral dormitories. A total of 131 of these schools received BIE funds but operated through grant agreements or contracts. BIE directly operated the remaining 54 schools.

San Ildefonso Day School

The San Ildefonso Day School, located on the San Ildefonso Pueblo, 15 miles north of Santa Fe, NM, is a BIE-operated day school for students in kindergarten through grade 6.

Findings

The No Child Left Behind Act requires a comprehensive needs assessment be conducted and strategies developed on how to support academic achievement. San Ildefonso Day School had a partially completed comprehensive needs assessment. As a result, the school did not have an adequate plan in place to ensure students' educational achievement.

School officials had administered an English language learner (ELL) assessment. All students however, were combined into classrooms under three teachers, regardless of their assessment outcomes. As a result, it is likely ELL students have not received the additional support necessary to help them achieve academically.

Comprehensive Needs Assessment

San Ildefonso completed a self-assessment for the 2013/2014 school year using an assessment tool, identified as AdvancED. This self-assessment was provided to us by school officials as evidence of their completion of a comprehensive needs assessment. We evaluated the AdvancED assessment and found it only partially addressed the eight critical areas related to strengths and the eight critical areas related to needs and priorities.

We identified the critical areas for our analysis by reviewing guidance from the U.S. Department of Education (ED) as well as needs assessment materials in place in a number of education programs outside BIE. Though not specifically required by statute or regulation, we view these areas as widely accepted in the educational community.

Our discussions with ED officials also revealed their belief that completion of the comprehensive needs assessment, and actions that keep assessments up-to-date and routinely reviewed, were key steps to ensure every school had a blueprint to keep them on target for improved academic achievement.

Figure 1, below, summarizes our review of San Ildefonso Day School's comprehensive needs assessment.

CRITICAL AREA	YES	NO
Is the Assessment Current (2013/2014 School Year)	✓	
Does the Assessment Identify Strengths related to:		
Demographics		X
Student Achievement	✓	
School Culture and Climate	✓	
Staff Quality, Recruitment and Retention		X
Curriculum, Instruction and Assessment	✓	
Family and Community Involvement	✓	
School Organization	✓	
Technology		X
Does the Assessment Identify Needs and Priorities related to:		
Demographics		X
Student Achievement	✓	
School Culture and Climate	✓	
Staff Quality, Recruitment and Retention	✓	
Curriculum, Instruction and Assessment		X
Family and Community Involvement	✓	
School Organization	✓	
Technology	✓	

Figure 1. Critical areas identified and used for this inspection.

Completion of the comprehensive needs assessment involves—

- systematic identification of strengths and needs;
- examination of the nature and cause of each identified need; and
- prioritization of each need, or the cause of that need, for future action.

A comprehensive needs assessment should take a more holistic approach to a school's evaluation than what the school's self-assessment covered. While many of the school's strengths and needs were identified, the underlying causes of identified needs were not fully examined, nor were plans for action prioritized. For example, in the assessment, school officials noted the need for improved communication and parental involvement, and suggested plans to "increase parent involvement through math and reading literacy nights." The reason parents are not currently involved is not discussed, nor is it clear why (and if) these offerings would actually improve parental involvement. The number and frequency of literacy nights was also not covered.

The AdvancED assessment demonstrated some strengths that could benefit the school. Specifically, the assessment took a systematic approach to its completion and it addressed some critical areas we identified. The AdvancED tool, however, should be considered a complementary report to a more holistic comprehensive

needs assessment, providing additional information and data. It should not be considered a replacement for the full comprehensive needs assessment.

Systematic identification and prioritization of student needs can help decision makers develop school-wide reform strategies that offer increased academic achievement opportunities for school children. The needs assessment might also help decision makers allocate scarce resources wisely in support of students' educational achievement.

Recommendation

We recommend that San Ildefonso Day School:

- I. Update its comprehensive needs assessment by—
 - systematically identifying the strengths and needs associated with its unique school population;
 - identifying the root causes of identified needs;
 - identifying the school's available resources;
 - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
 - developing a strategy that applies the results of the comprehensive needs assessment, responding to the problems, root causes, and corrective actions identified; and
 - routinely revisiting the strategy to ensure that it continues to address identified needs and contribute to improved academic achievement and, if it does not, modifying it as necessary.

Culture and Language

The Native American Languages Act of 1990 encourages the use of native languages as a medium of educational instruction to increase student success, performance, educational opportunity, cultural awareness, and community pride, especially in BIE-funded schools. Likewise, the No Child Left Behind Act declares as national policy “that programs that serve Indian children are of the highest quality and provide for not only the basic elementary and secondary educational needs, but also the unique educational and culturally related academic needs of these children.” San Ildefonso Day School did not provide classes with such a cultural component.

National policy allows educational instruction in a native language according to a school's preference. All assessments to measure academic achievement, however, are given in English. Therefore, a student might come from a home where only English is spoken and be able to communicate fluently in conversational English;

however, that same student might not have mastered the more formal written, auditory, and visual language requirements of academic English. Even a highly intelligent student might still struggle in an educational setting if unable to clearly express ideas in the more formal context of academic English. The English language learner (ELL) assessment test has sections in reading, writing, speaking, and listening comprehension that help educators identify students who have mastered conversational but not academic English or terminology used in the STEM programs.

All states require some type of ELL assessment that ranges from simply asking parents to identify the primary language spoken in the home to a formal test administered to all students. Upon enrolling their children in school, New Mexico parents are asked if their children speak a language other than English in the home.¹ Should they provide a positive response, the student is then given the W-APT² placement test. During our visit we noted that San Ildefonso Day School had administered ELL assessments for new students and incoming kindergartners. All students, however, were combined into classrooms under three teachers, regardless of their assessment outcome. As a result, ELL students have likely not received the additional support necessary to help them achieve academically.

Recommendation

We recommend that San Ildefonso Day School:

2. Develop a plan to meet the academic needs of each student identified as an ELL on the formal assessment.

¹ This is done through the Home Language Survey, which parents must complete. The survey includes question 2, asking “what language did your child first learn to speak?” and question 3, also asking “what language does YOUR CHILD use most at home?” If the answer to either question is “a language other than English,” the school has to give the student the W-APT placement test.

² W-APT refers to the “WIDA ACCESS Placement Test,” specifically the WIDA Assessing Comprehension and Communication in English State-to-State Placement Test, used in various states as an ELL assessment tool.

Conclusion and Recommendations

Conclusion

The comprehensive needs assessment is a planning tool that assists schools to design and prioritize strategies that meet the specific needs of their unique student populations. San Ildefonso Day School's comprehensive needs assessment, however, was not complete. As a result, the school did not have an adequate plan in place to ensure students' successful educational achievement.

School officials had administered an English language learner (ELL) assessment. All students, however, were combined into classrooms under three teachers, regardless of their assessment outcomes. As a result, it is likely ELL students have not received the additional support necessary to help them achieve academically.

Recommendations

We recommend that San Ildefonso Day School:

1. Update its comprehensive needs assessment by—
 - systematically identifying the strengths and needs associated with its unique school population;
 - identifying the root causes of identified needs;
 - identifying the school's available resources;
 - developing corrective action plans to address the identified needs and their root causes, including prioritization of actions based on available resources;
 - developing a strategy that applies the results of the comprehensive needs assessment, responding to the problems, root causes, and corrective actions identified; and
 - routinely revisiting the strategy to ensure that it continues to address identified needs and contribute to improved academic achievement, and, if it does not, modifying it as necessary.
2. Develop a plan to meet the academic needs of each student identified as an ELL on the formal assessment.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to the programs in place at the San Ildefonso Day School to improve educational achievement. We performed the same inspection at 15 other schools funded by the Bureau of Indian Education (BIE) including:

- Tonalea Day School
- Lukachukai Community School
- Tuba City Boarding School
- Moencopi Day School
- Flandreau Indian School
- Sicangu Owayawa Oti (Rosebud Dormitory)
- Pierre Indian Learning Center
- Cherokee Central Schools
- Ahfachkee Indian School
- Miccosukee Indian School
- Chemawa Indian School
- Yakama Nation Tribal School
- Paschal Sherman Indian School
- Ojo Encino Day School
- Te Tsu Geh Oweenge Day School

We also performed a separate review at the San Ildefonso Day School to evaluate the program in place at schools funded by BIE to prevent violence. The result of that review will be presented in a separate report.

Methodology

We conducted this review from May 2014 to August 2014 in accordance with the Quality Standards for Inspections and Evaluations as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions.

To address our objective—

- we reviewed criteria (e.g., laws, regulations, policies, and procedures); studies; prior reports; and school documentation;
- we interviewed officials at the Department of Education's Office of Student Achievement and School Accountability, Office of Indian Education, and the Academic Improvement Group; BIE's Division of Performance and Accountability; and San Ildefonso Day School; and
- we visited San Ildefonso Day School on May 22, 2014.

Report Fraud, Waste, and Mismanagement



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