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# General Accounting Office

## Local Coordination Prevents Duplication Of Services At Federally Sponsored Indian Education Projects

Local coordination of federally sponsored Indian education projects prevented duplication of efforts at 25 project sites reviewed. However, at sites lacking coordination of such projects, the potential for duplication of efforts remains. Proposals to merge the Office of Indian Education's Title IV program and the Bureau of Indian Affairs' Johnson-O'Malley program or eliminate either program should not affect what types of services are available; however, they could affect which Indian students receive services.



116300



HRD-81-101  
JUNE 15, 1981

517220

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# UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

HUMAN RESOURCES  
DIVISION

B-203468

The Honorable James McClure  
Chairman, Subcommittee on Interior  
and Related Agencies  
Committee on Appropriations  
United States Senate

Dear Mr. Chairman:

In Senate Report 96-985, the Subcommittee expressed concern about the possible duplication between Indian education programs authorized by Title IV, Part A, of the Indian Education Act (20 U.S.C. 241aa-241ff) and those authorized by the Johnson-O'Malley Act (25 U.S.C. 452-457). The Title IV program is administered by the Department of Education's Office of Indian Education, and the Johnson-O'Malley (JOM) program is administered by the Department of the Interior's Bureau of Indian Affairs. The Subcommittee requested that we examine the two programs to determine the extent of duplication and make recommendations for potential consolidation of the programs or better coordination between them. To respond to the Subcommittee's request, we analyzed the implementation of Indian education projects at 30 sites receiving funds from both programs. The results of our review are summarized below and detailed in appendix I.

Although the JOM and Title IV programs have similar goals and objectives, coordination between officials at most project sites we visited resulted in little duplication of services. However, some sites did not coordinate the two programs, and there was some duplication, or potential for duplication, of services. Of the 30 JOM-Title IV sites we visited, 25 have adequately coordinated project activities and 5 have not. At one of the latter sites, 34 high school students received counseling from both JOM and Title IV counselors. Both programs also provided students with parental cost items, such as school supplies and shoes. Some project administrators at the other four sites were not aware of the other project's activities. Others who were aware did not coordinate their programs to assure that the same students did not receive the same type of services from both programs.

In addition to examining the extent of duplication between the JOM and Title IV programs, we analyzed the impact of merging the two programs as well as the impact of eliminating one of them on

- use of program funds,
- program eligibility requirements, and
- program administration.

Because the programs' goals and objectives are similar, merging the programs or eliminating either of them should not greatly affect the types of services for which funds are available.

Conversely, because the programs have different eligibility requirements, student populations, and certification procedures, merging them or eliminating one would affect the eligibility of some Indian students. The JOM eligibility criteria are more restrictive than the Title IV criteria; thus, if the Title IV program were eliminated, some Indian students currently eligible for services would no longer be eligible. Specifically, under JOM's criteria most urban and non-federally recognized Indian students would no longer be eligible for services, and urban students who meet JOM eligibility criteria would have difficulty getting services unless they live near a reservation. If the JOM program were eliminated, Indian students under both programs would generally continue to be eligible, but the resources available for students on or near reservations could be diminished.

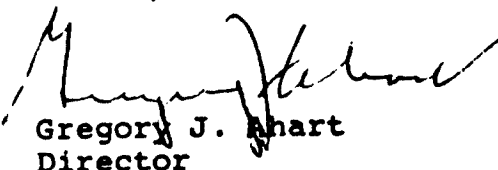
Regarding program administration, we considered three important aspects: (1) local project control, (2) Federal program jurisdiction, and (3) parent and education committee relations. Merging the programs or eliminating either would affect local project control and Federal program jurisdiction. However, none of these scenarios is likely to significantly affect the parent or education committees.

As requested by your office, we did not obtain written comments from the Departments of the Interior and Education on this report. The contents of the report were, however, discussed with officials of the two Departments, and we have considered their comments in this report.

B-203468

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 5 days from its issue date. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,



Gregory J. Smart  
Director



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ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office
JOM	Johnson-O'Malley
LEA	local education agency
OIE	Office of Indian Education





INTRODUCTION

The Senate Appropriations Subcommittee on Interior and Related Agencies requested, in Senate Report 96-985, that we review the Johnson-O'Malley (JOM) Indian education program, administered by the Department of the Interior's Bureau of Indian Affairs (BIA), and the Title IV, Part A, Indian education program, administered by the Department of Education's Office of Indian Education (OIE). Because of program similarities, the Subcommittee was concerned about possible duplication between JOM and Title IV. The Subcommittee requested that we examine these programs and make recommendations for potential consolidation or better coordination between the two agencies.

Johnson-O'Malley program

Before passage of Part A of the Indian Education Act, the Federal Government's role in public school Indian education primarily involved the JOM program. The JOM program, authorized by Public Law 73-167 (25 U.S.C. 452-457), provides financial assistance to meet the specialized and unique educational and cultural needs of eligible Indian students. Until fiscal year 1976, JOM funds were used for basic support programs with wide variations in the per pupil value of grants among various States. However, beginning with fiscal year 1976, JOM revised regulations provided that

--all use of funds for basic support purposes by school districts be phased out over 3 years,

--henceforth, JOM assistance in the public schools could be used only for supplementary assistance programs and projects designed to serve the special educational and cultural needs of Indian children, and

--all supplementary assistance be allocated among eligible recipients according to a distribution formula devised by BIA.

JOM provides funds to prime contractors--qualifying States, school districts, tribal organizations, or Indian corporations--that serve individuals (age 3 through grade 12) who have at least one-fourth Indian blood and are recognized by the Secretary of the Interior as being eligible for BIA services. Only federally recognized Indian tribes are eligible for JOM services. Funds are allocated on the basis of the number of eligible students, including allowances for the actual cost of delivering educational services in each State. For fiscal year 1981, the Congress appropriated \$29.5 million, which was distributed to 303 prime contractors.

Although the JOM program regulations do not cite specific services that may be offered, BIA program officials consistently approve remedial reading and mathematics, cultural enrichment, and counseling--services similar to those provided by Title IV. Program regulations also require the establishment of an Indian Education Committee, which gives Indian parents authority to participate fully in administering JOM projects. Their participation includes recommending curriculums, approving the budget, recommending criteria for employment, evaluating staff performance, and hearing grievances.

#### Title IV, Part A, Indian Education Act

With regulatory requirements similar to those of the JOM program, Title IV, Part A, of the Indian Education Act was enacted under Public Law 92-318 (20 U.S.C. 241aa-241ff) to provide financial assistance to local education agencies (LEAs) and tribal schools for elementary and secondary education programs to meet the special educational and culturally related academic needs of Indian and Alaska Native children. The program was adopted in response to the findings by the Indian Education Subcommittee of the Senate Committee on Labor and Public Welfare that Indian children had not been offered an educational opportunity equal to that offered most American children. Indian children had achievement levels 2 to 3 years below those of other students and a dropout rate twice the national average.

Grants are made to LEAs according to the number of eligible students enrolled multiplied by the State average per pupil expenditure. LEAs are eligible if they have at least 10 Indian students or any tribal school with an educational program that meets BIA standards. The program authorizes financial assistance to plan, develop, and implement elementary and secondary school programs to meet the special needs of eligible students. For fiscal year 1981, the Congress appropriated \$47.3 million, which was distributed to 1,135 LEAs and tribal schools.

Unlike the JOM program, the Title IV program serves non-federally recognized as well as federally recognized tribes. It may also serve students with less than one-fourth Indian blood. The regulations permit, but are not limited to, the following activities:

- Remedial instruction in reading and mathematics.
- Native and creative arts and crafts.
- Home and school liaison counseling.
- Parental cost items, such as food, clothing, academic expenses, and medical and dental care.

In addition to providing funds for special Indian education programs, Title IV, like JOM, requires parental involvement in program implementation. The Title IV parent committee is responsible for approving in writing project applications, advising in the development of hiring policies and procedures, and participating in the assessment of student needs and project evaluations.

Objectives, scope, and methodology

To give the Subcommittee insights into possible duplication between the JOM and Title IV programs, we

- identified 407 project sites receiving funds from both programs, 398 of which were west of the Mississippi River;
- reviewed the implementation of projects selected from 30 sites receiving funds from both programs; and
- interviewed program officials at BIA headquarters and field offices and OIE headquarters.

Although Native Americans inhabit each of the 50 States, about 70 percent live in Alaska, Arizona, California, Montana, New Mexico, North Carolina, Oklahoma, and Washington. Of our 30 sites, 22 (73 percent) were in these States. We did not review project sites in North Carolina because none received funds from both programs.

We used judgmental rather than statistical sampling; therefore, observations made from these findings apply only to the sample population. However, we considered such factors as project size, type of tribe, reservation versus nonreservation sites, and accessibility to include projects that we believe should be representative of these programs.

The following table shows by State the sites we visited, funds they received, and number of eligible participants compared to nationwide totals.

Summary of Site Visits  
Fiscal Year 1981 Data

<u>State</u>	<u>Project sites</u>	<u>Funds received</u>		<u>Eligible participants</u>	
		<u>JOM</u>	<u>Title IV</u>	<u>JOM</u>	<u>Title IV</u>
(000 omitted)					
Arizona	7	\$1,191	\$1,319	9,547	10,139
Washington	4	272	262	1,616	1,669
New Mexico	3	1,399	1,341	10,426	10,198
Oklahoma	3	156	468	1,197	3,533
Alaska	2	1,404	980	3,977	3,616
Montana	2	82	143	415	463
Nevada	2	140	172	964	1,318
California	1	42	122	219	403
Florida	1	32	24	273	197
Idaho	1	90	84	712	770
Nebraska	1	31	33	313	284
New York	1	77	70	344	321
North Dakota	1	27	24	189	192
South Dakota	<u>1</u>	<u>15</u>	<u>a/117</u>	<u>95</u>	<u>95</u>
Total	<u>30</u>	<u>\$4,958</u>	<u>\$5,159</u>	<u>30,287</u>	<u>33,198</u>
Nationwide total	(b)	<u>\$29,469</u>	<u>\$46,922</u>	<u>177,822</u>	<u>328,407</u>

a/These funds for a relatively small number of participants are used to operate a dormitory and school for problem children.

b/As indicated earlier there are 1,135 Title IV project sites. However, the total number of JOM project sites was not readily available because of the large number of subcontractors involved in the 303 prime contracts.

The 30 projects visited represented 7 percent of all projects receiving funds from both programs. These projects represented 17 percent of all JOM funding and eligible participants and 10 percent of all eligible Title IV participants and 11 percent of total Title IV funding.

Seven of the 30 sites were on reservations. (See app. II.) At the seven reservation sites, Indian students represented an average of about 70 percent of the total school enrollment. Of the 23 sites not on reservations, 15 served students who lived on reservations. Indian enrollment at nonreservation sites averaged about 5 percent.

POTENTIAL FOR DUPLICATION  
AT SOME PROJECT SITES

The Title IV and JOM programs have similar objectives in that both provide supplemental funds for projects intended to address the special needs of Indian students. Despite the similarities, officials at most project sites we visited avoided duplication of services to students through coordination of program activities. However, some sites did not effectively coordinate the two programs, and there was some duplication, or potential for duplication, of services to students.

Some sites need better coordination

Of the 30 sites we visited, 25 avoided duplicating services to students by coordinating project activities. At 10 of the sites with both programs providing similar services, responsibilities were designated by grade level to avoid duplicating services. For example, at one Arizona site, Title IV funded the salary of one tutor to serve grades kindergarten through 8, and JOM funded a tutor to serve grades 9 through 12.

At 10 other sites the programs were designed to emphasize different activities:

- Three used JOM for remedial education and Title IV for cultural enrichment.
- Three used JOM for parental cost items and Title IV for remedial education.
- One used JOM for cultural enrichment and Title IV for counseling and remediation.
- One used JOM for parental cost items and Title IV for counseling.
- One used JOM for teacher salaries and Title IV for cultural enrichment.
- One used JOM for teacher aides and Title IV for tutors for remedial education.

Five sites combined their JOM and Title IV programs to form a single Indian education project. Officials at three of these sites stated their combined programs were easier to administer and effective in avoiding duplication. By combining their programs, four of the five sites needed only one person to manage and oversee day-to-day operations. In addition, four sites had combined their parent committees.

The other five sites did not effectively coordinate their activities between the two programs. Given the similarity in program goals and objectives and the types of services provided, there is potential for duplication of services between JOM and Title IV--especially where coordination between the programs is lacking.

At one of these sites, 34 high school students received counseling from both JOM and Title IV counselors. Both programs also provided students with parental cost items, such as school supplies and shoes. Several students received notebooks, pencils, and paper from both programs, and one student received a pair of shoes from each.

Although we did not identify any instances of duplication of efforts at the other four sites, local administrators made no attempt to coordinate program activities. In fact, some administrators for one program were not aware of the other program's activities. In addition, those who were aware did not effectively coordinate activities to assure that the same students did not receive the same services from both programs.

### Conclusions

Because of the similarities in services provided by JOM and Title IV, there is potential for duplication of services. Where local sites coordinated their activities under these programs, they were able to avoid duplication. However, for sites that did not coordinate their activities, actual or potential duplication of services exists.

### Recommendation

We recommend that the Secretaries of Education and the Interior establish policies and procedures to require project sites that receive funds from both programs to coordinate their project activities to minimize duplication of services.

### CONSEQUENCES OF PROGRAM MERGER OR ELIMINATION

The merger or elimination of either the JOM or Title IV program could affect certain aspects of the programs' operations while leaving others virtually unchanged. Our analysis of three factors--(1) use of program funds, (2) program eligibility requirements, and (3) program administration--showed that any proposal to merge the programs or eliminate either of them should not affect what types of services are available, but could affect which Indian students receive services and who has local project control and Federal jurisdiction.

### Use of program funds

Because their goals and objectives are similar, merging the JOM and Title IV programs or eliminating either of them should not greatly affect the types of services provided.

The wording of the regulations concerning the basic program objectives is similar, allowing funds to be used for the same activities. For example, both the JOM and Title IV regulations provide that funds are to be used to meet the specialized and unique educational and culturally related academic needs of eligible Indian students.

Many of the specific services provided by both programs are the same. At the 30 sites, 27 JOM and 25 Title IV projects emphasized education. The key components comprising academic education within both programs were remedial reading, mathematics, and counseling. Both programs also provided some cultural enrichment activities. The only significant difference between the services provided by the two programs was that JOM funds were used more frequently for "parental cost" services than were Title IV funds. For example, of the 30 sites we visited, the JOM program provided food or clothing to students at 6 sites, school transportation at 11 sites, and medical examinations or school supplies at 20 sites. In contrast, the Title IV program provided food or clothing at two sites, transportation at two sites, and medical examinations or school supplies at seven sites.

Assuming that overall funding remains the same or is increased, merging the two programs or eliminating one would not necessarily change services because of the similarities in program goals and objectives and in the services provided or permitted. If, however, the programs' funding levels were reduced because of the merger or elimination, the burden of providing some of the services to Indian students would probably fall to other Federal, State, and local programs that provide similar services. For example, many of the Indian education projects we visited provided remedial education. Some of these projects also received funds from the Title I-Disadvantaged program (a federally sponsored compensatory education program), <sup>1/</sup> and several received funds from State and local remedial education programs. Any merger or elimination proposal put forth with the intent of reducing funding levels should consider the impact such actions would have on other Federal remedial education programs. The Title I program, for example, is currently unable to completely serve its target population because of fiscal constraints.

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<sup>1/</sup>Title I of the Elementary and Secondary Education Act of 1965 was enacted to meet the special educational needs of children of low-income families. The program's objective is to expand and improve educational programs for these children.

Program eligibility requirements

In contrast to the similarities in the use of program funds, JOM and Title IV eligibility requirements differ significantly in three respects:

- Eligibility criteria.
- Services to urban versus reservation students.
- Certification procedures.

Because of these differences, merging the two programs or eliminating either could result in some Indian students who are now receiving services becoming ineligible.

Eligibility criteria

The Title IV eligibility criteria are considerably less stringent than the JOM requirements. Under Title IV, parents need only provide proof that their children are Indian. The Title IV legislation defines Indian to mean any individual who is

- (1) a member of a tribe, band, or other organized group of Indians, including those terminated since 1940 and those recognized by the State in which they reside;
- (2) a descendant in the first or second degree of an individual described in item (1) above;
- (3) considered by the Secretary of the Interior to be an Indian for any purpose; or
- (4) an Eskimo, Aleut, or other Alaska Native.

Using the Title IV eligibility criteria, a person with a very small degree of Indian blood could qualify for program services.

The JOM eligibility criteria are more restrictive. Students qualifying for services must

- (1) be members of a federally recognized tribe of Indians and
- (2) have one-fourth or more Indian blood and be recognized by the Secretary of the Interior as being eligible for BIA services.

As a result, the JOM program generally serves students with a higher degree of Indian blood than does the Title IV program.



Theoretically, most of the students that qualify for JOM also meet the Title IV requirements. However, Title IV children with less than one-quarter Indian blood cannot be served by the JOM program. Nationwide, the numbers of students certified for the Title IV and JOM programs were 328,407 and 177,822, respectively.

#### Urban versus reservation students

The differences in eligibility criteria cause the programs to serve not only different numbers of students but also students in different locations. The JOM program gives priority to Indians on or near reservations, while Title IV services go more to urban Indians. For example, virtually all of the 303 JOM prime contracts in fiscal year 1981 were awarded to tribal organizations or school districts on or near reservations. Title IV grants, on the other hand, were awarded on a broader basis to include school districts in urban areas.

#### Certification procedures

Student certification requirements under the JOM and Title IV programs differ. The Title IV program requires parents of Indian students to certify the students' eligibility. Since the 1980-81 school year, parents have had to provide detailed data showing that students meet one of the four criteria discussed earlier. For example, students that qualify as descendants of Indian tribe members are required to show their ancestor's name, tribe, and membership number. Before 1981 parents needed only to indicate they were Indian.

Title IV certification requirements have caused some difficulties. Urban Indians particularly have difficulty obtaining the information needed because necessary tribal records were not readily available and sometimes were destroyed, lost, or not up to date. Many parents have expressed frustration in obtaining the necessary certification data and have not complied with the certification requirements. Since the beginning of the 1980-81 school year, the number of students being certified for the title IV program has dropped. For example, participation dropped from 843 to 403 at one site and from 584 to 300 at another.

The JOM program also has a student certification process. Parents or students are required to complete a family tree dating back to the students' great grandparents. The date of birth, tribe, roll number, and degree of Indian blood must be given for each ancestor listed.

Sometimes there are problems in obtaining the data needed for JOM certification because tribal records were destroyed, lost, or not up to date. However, because JOM students are more likely to be located on or near reservations where the records are kept,

they generally had fewer problems obtaining the needed information than did their their Title IV counterparts who did not live near the reservation. In many cases, the JOM form was completed by local BIA officials, tribal leaders, and school district officials who had access to tribal rolls.

### Our observations

Neither merging the JOM and Title IV programs nor eliminating either program would reduce the number of problems in obtaining eligibility information. The difficulties in getting tribal records and the frustration with the certification process in general would exist under either set of regulations. However, because the programs have different eligibility requirements and serve different student populations, a merger or an elimination could change the students served. If the programs were merged and the JOM regulations were selected, only federally recognized Indian students would be eligible for services. Urban students who meet JOM eligibility criteria would have difficulty getting services unless they lived near a reservation.

If the Title IV regulations were selected in a merger or if the JOM program were eliminated, the effect would be somewhat different. Indian students under the two programs would generally continue to be eligible, but the resources available for students on or near reservations could be diminished.

### Program administration

Three important aspects of Indian education program administration are (1) local project control, (2) Federal program jurisdiction, and (3) parent and education committee relations. Merging the Title IV and JOM programs or eliminating either program would affect local project control and Federal program jurisdiction. However, none of these scenarios would be likely to greatly affect the parent or education committees.

### Local project control

Federal funds under the Title IV and JOM programs are allocated to the local level in different ways, which result in differences in local project control. JOM funds go from BIA to prime contractors, who may carry out the program themselves or work through subcontractors. According to JOM regulations, as indicated earlier, prime contractors may be "any State, school district, tribal organization or Indian corporation."

Title IV funds, on the other hand, are generally allocated by OIE directly to the LEA. The Indian community can only participate in the direction and management of local Title IV projects through parent committees.

If the JOM and Title IV programs were merged and BIA's approach were selected or if the Title IV programs were eliminated, the control of local projects would generally rest with the tribal organizations and Indian corporations as prime contractors. They could then carry out the program themselves without regard to the LEAs. As shown in the following table, in recent years more and more of the JOM funds are being distributed to Indian tribes and tribal organizations as prime contractors.

Distribution of JOM Prime Contracts

<u>Fiscal year</u>	<u>Tribe or tribal organization</u>	<u>Public school district</u>	<u>State department of education</u>	<u>Total</u>
1975-76	44	83	9	136
1976-77	121	105	7	233
1977-78	146	92	6	244
1978-79	152	90	6	248
1979-80	174	76	6	256
1980-81	227	70	6	303

If the two programs were merged and OIE's approach were selected or if the JOM program were eliminated, local projects would generally be controlled by the LEAs. LEA participation in the Title IV program is voluntary; therefore, if the LEA chooses not to participate, Title IV services would not be available to Indian students even if Indians in the community believe the services are needed.

In fiscal year 1980, for example, only 1,124 of 2,929 eligible school districts applied for Title IV funds. This lack of voluntary participation by LEAs in the Title IV program has been of much concern within the Indian community.

Believing that Indian people better understand their value system, culture, history, and language, many Indians feel tribal organizations are more responsive to the needs of Indian students than are public school districts or State departments of education. In a 1975 report entitled "Through Education: Self Determination" the National Advisory Council on Indian Education indicated that the special needs of Indian children are not always understood by the public school districts that serve off-reservation Indian families. According to the report, Indians are most often lumped with other minorities and, when left unassisted, lose ground in the public schools. The report adds that most curriculums in

these schools are essentially uniform--few respond to the Indian pupils' special need for different language and cultural materials.

#### Federal program jurisdiction

Because the JOM and Title IV programs are administered by different Federal agencies--the Department of the Interior and the Department of Education--each program requires local sites to submit separate project applications, to independently certify the eligibility of Indian students, to account for expenditures and report on project results separately, and to follow different sets of regulations. In implementing their programs, some sites have consolidated the resources from the two programs into one project. However, they must continue to maintain separate records to report on and account for both programs' expenditures.

Merging the two programs or eliminating either would allow local sites that currently receive funds from both programs to account to one Federal agency under one set of regulations. We identified 407 project sites that receive funds from both programs. A merger would allow them to consolidate their administrative tasks and reduce paperwork and possibly reduce their administrative cost.

#### Parent and education committees

While the membership of the JOM and Title IV parent and education committees may differ somewhat, both include parents of students in the program and both perform the same functions. Both committees are required to participate in planning, development, implementation, and evaluation of all project activities. In fact, at nine of the sites visited, one committee represented both JOM and Title IV. Apparently, if the programs were merged, very little change would occur in terms of committee operations. The same would be true if either program was eliminated.

SCHOOL DISTRICTS RECEIVING FUNDS FROM JOM  
AND TITLE IV INCLUDED IN REVIEW

<u>School districts</u>	<u>Reservation sites</u>	<u>Nonreservation sites</u>	<u>Predominant tribal affiliation</u>
Anadarko, Okla.		X	Kiowa
Anchorage, Alaska		X	(a)
Auburn, Wash.		X	Muckleshoot
Bernalillo, N. Mex.		X	Pueblo
Blackfoot, Idaho		X	Shoshone and Bannock
Broward County, Fla.		X	Seminole
Clark County, Nev.		X	Paiute
Dixon, Mont.	X		Salish and Kootenai
Durant, Okla.		X	Choctaw
Electric City, Wash.		X	Colville
Ferndale, Wash.		X	Lummi
Flagstaff, Ariz.		X	Navajo
Fort Defiance, Ariz.	X		Navajo
Gallup, N. Mex.		X	Navajo
Grand Canyon, Ariz.		X	Hopi
Grants, N. Mex.		X	Acoma and Lagunaare
Lodge Grass, Mont.	X		Crow
Oklahoma City, Okla.		X	(a)
Phoenix, Ariz.		X	(a)
Pierre, S. Dak.		X	Sioux
Sacramento, Calif.		X	(a)
Salamanca, N.Y.	X		Seneca
San Carlos, Ariz.		X	Apache
Sitka, Alaska		X	Tlingits
Solen, N. Dak.		X	Sioux
Tuba City, Ariz.	X		Hopi and Navajo
Tucson, Ariz.		X	Yaqui
Wapata, Wash.	X		Yakima
Washoe County, Nev.		X	Washoe and Paiute
Winnebago, Nebr.	X		Winnebago
Total sites visited	<u>7</u>	<u>23</u>	

a/Students served in these districts represented a number of different tribes.

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