

CED-77-24

1-17-77



REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES



Concerted Effort Needed To Improve Indian Education

Bureau of Indian Affairs
Department of the Interior

In April 1972 GAO reported that the Bureau of Indian Affairs needed to improve the quality of education provided by Bureau schools. Since April 1972 the Bureau had done little to meet the educational needs of its students.

--Indian education for the 1970s had not been defined.

--A comprehensive educational program had not been established.

The Department of the Interior should establish policies and procedures which will make sure educational opportunities are provided enabling Indians to compete in the careers of their choice. The congressional committees should more intensively monitor the Bureau to insure that educational needs of Indian students are met and, if adequate progress is not made, explore other alternatives, such as transferring responsibilities for administering Indian education programs to another Government agency.

*Dupe of U90999
/00/32*

CED-77-24

709042

JAN. 17, 1977



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Albert H. Quie
House of Representatives
The Honorable Paul J. Fannin
United States Senate

This report points out that the Bureau of Indian Affairs, Department of the Interior, did not implement the recommendations in our report to the Congress entitled "Opportunity to Improve Indian Education in Schools Operated by the Bureau of Indian Affairs," (B-161468, April 27, 1972).

The report discusses the need for the Bureau to establish a comprehensive Indian education program that will provide education services to Indians enabling them to compete in the careers of their choice. It also discusses the need for the congressional committees to more intensively monitor the Bureau to insure that educational needs of Indian students are met and, if adequate progress is not made, explore other alternatives, such as transferring responsibilities for administering Indian education programs to another Government agency.

Copies of this report are being sent to the Director, Office of Management and Budget, and to the Secretary of the Interior.

A handwritten signature in black ink, reading "James B. Stacks".

Comptroller General
of the United States

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ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office

REPORT OF THE COMPTROLLER
GENERAL OF THE UNITED STATES

CONCERTED EFFORT NEEDED
TO IMPROVE INDIAN
EDUCATION
Bureau of Indian Affairs
Department of the Interior

D I G E S T

In April 1972 GAO told the Congress that the educational programs in schools operated by the Bureau of Indian Affairs needed to be improved. In its report GAO recommended that the Department of the Interior require the Commissioner of Indian Affairs to:

- Clearly apprise all operating levels of its goal of reaching a level of academic achievement for Indian students equal to the national average and the date when this was to be accomplished.
- Identify and assign priorities for dealing with all critical factors that would impede progress toward the goal.
- Develop a comprehensive education program designed to overcome obstacles that would impede progress toward the goal but flexible enough to meet the needs of students in all Bureau schools. (See p. 2.)

Interior stated in 1972 that GAO's conclusions and recommendations would constructively support the Bureau's efforts to improve its education program. However, during a current review GAO noted that the problems identified in 1972 still existed and the Bureau had not taken appropriate action to implement GAO's recommendations. (See p. 4.)

There was little evidence that the Bureau had made progress since 1972 toward improving educational achievement of Indian children. For example, the Bureau had not communicated its educational goal to its area offices and schools nor designed and implemented a specific plan for raising Indian students' academic achievement levels. The Bureau did not update the goals and objectives published in its manual in 1953 and failed to define what constitutes adequate Indian education for the 1970s. (See pp. 4 to 7.)

Certain factors, such as the lack of adequate special education programs for students with a higher-than-average incidence of hearing loss and other problems, impede progress in academic achievement. The Bureau did not design specific programs or provide area offices or schools with instructions for dealing with such factors. (See pp. 8 to 13.)

GAO's 1972 report also recommended that the Bureau improve its management information system to provide information on academic aptitude and achievement levels of students and on program-oriented financial management reports. (See p. 2.) The Bureau had made some changes in its management information system, but it still does not provide education program managers with information they need. (See pp. 13 to 17.)

Bureau officials said the 1972 recommendations had not been implemented because the Bureau's Office of Indian Education Programs had not provided adequate program direction. The officials attributed this to the constant turnover in the Director's position and to the Bureau's organizational structure which prevented the Director from dealing directly with area offices and schools. (See p. 6.)

RECOMMENDATIONS TO THE
SECRETARY OF THE INTERIOR

GAO repeats the substance of its prior recommendations that the Secretary of the Interior require the Commissioner of Indian Affairs to:

- Determine the educational needs of Indian students, so appropriate programs can be designed to meet the needs.
- Establish realistic goals and objectives for meeting such needs and communicate the goals and objectives to all operating levels in the Bureau.
- Develop a comprehensive educational program which includes specific policies and procedures for dealing with problems which impede progress in meeting established goals and objectives.

--Monitor and evaluate implementation of established educational goals and programs at all operating levels of the agency.

--Develop a management information system that will provide:

1. Meaningful and comprehensive information on the academic aptitude and achievement levels of students in the Bureau's school system.
2. Program-oriented financial management reports to meet the management needs of Bureau education program officials.
(See pp. 19 to 20.)

MATTERS FOR ATTENTION
BY THE CONGRESS

Since the Bureau has made no major progress over the last several years in implementing policies, procedures, and programs to insure that the educational needs of Indian students are met, the congressional committees should more intensively monitor the Bureau and, if adequate progress is not made, explore other alternatives, such as transferring responsibilities for administering Indian education programs to another Government agency. (See p. 20.)

AGENCY COMMENTS

The Department of the Interior agreed with GAO's findings, conclusions, and recommendations with minor exceptions. The Department, in pointing out some new "program direction" being considered by the Bureau, stated that the role of the Bureau "in the future, as determined by the Congress and Indian communities of the country, is to support and strengthen Indian self-determination." The Department stated that "self-determination in education means that tribes should decide education issues and programs." According to the Department, the Bureau's role will be that of providing technical services, the full meaning of which is not, at this point, clearly known.

As more tribes move to determine their own educational issues and programs under self-

determination agreements, the Bureau must make sure that (1) the educational needs of Indian students are clearly identified and (2) realistic goals, objectives, and programs are established which will provide educational opportunities that enable Indians to compete in the careers of their choice. Under self-determination the Bureau's monitoring and evaluating activities should be set as one of its top priorities. (See pp. 20 to 23.)

CHAPTER 1

INTRODUCTION

On May 11, 1976, in a letter to the Comptroller General, Congressman Albert H. Quie, joined later by Senator Paul J. Fannin, requested us to audit schools operated by the Bureau of Indian Affairs (BIA). (See apps. I and II.) In accordance with the request and agreements reached with the Congressman's office, we directed our review primarily toward determining whether BIA had implemented the recommendations in our April 27, 1972, report to the Congress entitled "Opportunity to Improve Indian Education in Schools Operated by the Bureau of Indian Affairs" (B-161468).

During fiscal year 1975, about 190,000 Indian children, between the ages of 5 and 18 were enrolled in public, Federal, private, and mission schools. About 47,000 of these students were enrolled in 193 BIA-operated schools. BIA also operated 19 dormitories for about 3,000 students attending public schools and provided funding for 15 schools operated by Indian school boards under contract with BIA. In addition, BIA operated 3 post-secondary schools having a total enrollment of about 2,500.

The program for the education of Indian students in these federally operated or federally funded schools is administered by BIA's Headquarters offices in Washington, D.C., and Albuquerque, New Mexico, and 12 area and 79 agency offices.

During fiscal year 1976 BIA's appropriations for education totaled about \$244 million, of which \$157 million was appropriated for BIA school operations. The remaining \$87 million was for assistance to pupils in non-Federal schools, adult education, and higher education. Also, in fiscal year 1976, BIA received \$21.9 million through other Federal programs, such as those funded by the Elementary and Secondary Education Act of 1965 (20 U.S.C. 241a), administered by the Office of Education, Department of Health, Education, and Welfare. These funds were for programs, such as bilingual and special education.

During the 5-year period ended June 30, 1976, BIA obligated about \$763.1 million, including about \$93 million received through other Federal programs to operate programs in the BIA schools and dormitories that had an average enrollment of about 53,000 students.

It has been recognized by various Indian leaders and Government officials that education is a key element to

solving many of the problems faced by the Indians. In 1975 the Congress declared that a major national goal of the United States is to provide the quantity and quality of educational services and opportunities which will permit Indian children to compete in the careers of their choice. More recently, the National Advisory Council on Indian Education, in its third annual report to the Congress, dated March 1976, defined Indian education as an educational process that is designed to fill the gap between Indian culture and non-Indian culture.

PRIOR GAO REPORT ON BIA-OPERATED SCHOOLS

In our April 27, 1972, report we pointed out that little progress had been made toward achieving BIA's goal of closing the education gap between Indians and other Americans by raising the academic-achievement level of Indian students up to the national average by 1976. We recommended that the Department of the Interior require the Commissioner of Indian Affairs to:

- Clearly apprise all operating levels of its goal and the date by which it was to be accomplished.
- Identify and assign priorities for dealing with all critical factors known to impede progress toward accomplishment of the goal.
- Develop a comprehensive educational program designed to overcome factors which impede progress toward the goal and which is flexible enough to meet the needs of students in all BIA-operated schools.
- Establish periodic milestones to accomplish the established goal.
- Periodically evaluate program results on the basis of the established milestones to permit necessary program redirection.
- Develop a management information system that would provide (1) meaningful and comprehensive information on academic aptitude and achievement levels of students in BIA schools and (2) program-oriented financial management reports.

The Department of the Interior, in responding, stated that it generally agreed with the findings and expected that the report's conclusions and recommendations would constructively support BIA efforts to improve its education program.

In addition, the Department outlined plans for improving education goals and objectives, priorities, planning, and the management information system.

CHAPTER 2

NEED FOR AN APPROPRIATE

POLICY FOR INDIAN EDUCATION

One of the most important ways to overcome the problems Indians face is by improving the educational achievement level of Indian students. In our April 1972 report we pointed out that there had been relatively little evidence of progress. Therefore, as discussed on page 2, we made several recommendations to the Secretary of the Interior for improving Indian education in Bureau of Indian Affairs-operated schools.

Although the Department of the Interior, in responding to the report, stated that our conclusions and recommendations would constructively support BIA's efforts to improve its education program, we found little evidence during our current review that BIA made progress since 1972 toward improving educational achievement of Indian children. The problems identified in our 1972 report still existed, and BIA had not taken appropriate action to implement our recommendations. BIA had not established realistic goals and objectives and a comprehensive education program for dealing with critical factors which impede progress in improving Indian education.

BIA had not implemented an effective management information system to assist program managers in assessing the specific educational needs of Indian students, identifying the major problems that must be dealt with, devising a specific strategy for overcoming these problems, implementing an education program responsive to the student's needs, measuring progress toward goals, and assessing the effectiveness of each responsible level within the BIA school system in achieving educational goals.

BIA officials advised us that the recommendations in our 1972 report had not been implemented because there had been a continued lack of program direction from BIA's Office of Indian Education Programs. The officials attributed the lack of direction to the constant turnover in the Director's position and the BIA organizational structure which prevented the Director from dealing directly with area offices and schools.

REALISTIC GOALS AND PLANS NOT ESTABLISHED

If the educational gap between Indians and non-Indians is to be reduced, BIA must establish realistic goals and objectives as well as plans for achieving the goals. The

goals and plans must be communicated to area offices and schools, and procedures for monitoring and evaluating their implementation must be established to help insure that individual area office and school activities are designed to achieve the goals.

As discussed in our April 1972 report, BIA's major goal was to close the education gap between Indians and non-Indians by raising the academic achievement of Indian students to the national average by 1976. However, as our report pointed out, BIA had not advised its operating levels of the goal nor had it designed programs to achieve the goal. Officials at 5 of the 12 schools mentioned in our 1972 report stated that they were not aware of the BIA goal. Officials at the other seven schools stated that they knew of the goal but had not made a specific effort to design their programs to reach the goal because they had not been officially notified of it and had not received any guidelines or instructions from the central office.

Our 1972 report recommended that BIA clearly apprise all operating levels of its goal of reaching a level of academic achievement for Indian students equal to the national average and the date by which it was to be accomplished. We also recommended that BIA establish periodic milestones, such as the amount of improvement in the academic-achievement level necessary at the end of each successive year to accomplish the established goal. In its response to our 1972 report, the Department of the Interior stated that a task force was established in March 1971 to review the goals and objectives of BIA's education program. The Department stated that the goal of bringing Indian students to a level equal to the national average by 1976 was probably too optimistic but that this goal remained the Department's commitment.

In April 1971 the task force reported its findings and recommendations to the Director, Office of Indian Education Programs. Concerning Indian educational goals and objectives, the task force stated that its review of responses from various BIA operating levels revealed a lack of knowledge of the BIA goals and marked differences of opinion as to how the goals could be obtained. The task force concluded that:

"The related objectives (Section 101.01 of the BIA Manual) include guidelines which should be updated to define more accurately what constitutes adequate Indian education for the Seventies.

"Once updated, the Objectives and Guidelines and their associated standards and criteria should be widely disseminated to permit a concerted effort toward accomplishment at all levels."

We noted during our current review that BIA had not updated the goals and objectives published in its manual in 1953 to define more accurately what constitutes adequate Indian education for the 1970s. We also noted that BIA had not designed programs and procedures for implementing and apprising operating levels of its prior goal of closing the educational achievement gap or its revised goal of providing opportunities for equal educational achievement.

BIA officials stated that the goals had not been achieved partly because they were not realistic and because BIA did not properly deal with factors which prevented achievement. The officials stated that three principal factors preventing achievement of such goals were the lack of

- active and meaningful community support and participation;
- inservice community-based teacher training; and
- parent and community-based early childhood education programs that are geared to language, intellectual, cultural, emotional, and physical development.

Another BIA official stated that BIA does not have a comprehensive education program and that there is no agreement within BIA as to what the goals and objectives of such a program should be. Other BIA officials said that the failure of BIA to establish realistic goals and programs and to provide program direction to area offices and schools resulted in area offices and schools establishing their own goals and programs on an ad hoc basis.

Office of Indian Education Programs officials stated that BIA had not established realistic goals and education programs for improving the quality of education for Indian children because there had been a continued lack of program direction from the Office of Indian Education Programs. The officials attributed the lack of program direction to the constant turnover in the Director's position and the BIA organizational structure which prevented the Director from dealing directly with area offices and schools.

Concerning the turnover in the Director's position, BIA records showed that, during the 10-year period 1966-76, 15

different people held either the position of Director or Acting Director. The average length of time each person spent in office was about 7 months.

In July 1976 BIA appointed a new Director for the Office of Indian Education Programs. The new Director advised us in September 1976 that formal instructions had not been issued to area offices and schools to deal with the findings and conclusions in our 1972 report. He said he did not know why BIA had not issued such instructions. He further advised us that his major objective was to implement a policy of "self-determination" by encouraging local schools and parent associations to establish local goals and education programs based on their own needs. Such goals and programs, he added, would be reviewed by the area offices and submitted to the Office of Indian Education Programs in Washington, D.C., where they would be consolidated with other schools' goals and programs.

The Director stated that as part of his proposed policy of self-determination by local tribes, schools, and parent associations, he would encourage individual schools to submit work plans that include specific goals and programs and plans, procedures, milestones, and target dates for accomplishing the goals and programs. The Director also stated that his staff is in the process of developing plans and time lines to implement a policy acceptable to BIA, the Office of Management and Budget, and Indian communities. The Director stated, however, that he had not issued any instructions to area offices for implementing his proposed policy and did not know when the instructions would be issued. He stated that BIA's current organizational structure, which does not authorize line authority over area offices and schools, will make it difficult to implement his proposed policy. He stated that area offices have direct line authority over schools and report directly to the Commissioner of BIA on all education matters.

During our current review, officials at four area offices and seven BIA schools stated that BIA's central office had not apprised them that BIA's goal was to reach a level of academic achievement for Indian students equal to the national average or to develop a comprehensive educational program for improving the quality of Indian education. The officials also said that they had not received any guidelines from the central office for implementing the recommendations in our 1972 report. Some of the officials stated that the central office did not provide effective leadership and direction to operating levels concerning Indian education. As shown on page 6, central office officials agreed with this assessment.

NEED TO ESTABLISH PROGRAMS FOR DEALING
WITH FACTORS WHICH IMPEDE PROGRESS
TOWARD QUALITY EDUCATION

Our April 1972 report pointed out that inadequate attention to such matters as the need for training to compensate for English communication handicaps, special education programs, professional counseling services, and substitute teachers had an impact on the quality of Indian education and indicated that BIA had not organized its education program to accomplish its goal of closing the education gap between Indians and non-Indians. We recommended that BIA identify all such critical factors which impede progress toward established goals and establish a comprehensive educational program designed to overcome them.

Our current review showed that many problems still existed and BIA had not provided any written directives to area offices and schools for identifying and dealing with problems which impede progress toward improving the quality of Indian education. Although the Department of the Interior, in response to our 1972 report, identified seven areas needing attention, BIA officials stated that BIA had not issued any directives to area offices or schools for dealing with any of the problems. They also stated that BIA had not issued any directives to area offices or schools concerning the factors discussed in our April 1972 report. They attributed the failure to issue such instructions to the constant turnover in the position of the Director, Office of Indian Education Programs.

BIA officials at the four area offices and seven schools we visited during our current review stated that the critical factors identified and the priorities assigned in the Department of the Interior response to our 1972 report were not communicated to them. The officials stated that the BIA central office had not developed a comprehensive educational program for dealing with critical factors that impede progress in meeting education goals and objectives.

Some of the officials at the area offices and schools said that in their judgment the critical factors listed in the Department's response to our 1972 report were not necessarily the only factors which impede the progress of Indian children achieving parity with national academic achievement norms. For example, the acting assistant area director for education at one area office stated that other critical factors were the special physical, mental, cultural,

geographical, and social handicaps which many Indian students who attend BIA-operated schools have. Specifically, he listed factors, such as

- language barriers due to linguistic and cultural isolation;
- minimal educational reinforcement in the home;
- poverty, therefore, no books to read;
- health handicaps which impair the child's ability to learn; and
- lack of motivation to learn because of the lack of opportunity to use education on jobs on the reservation.

Education officials at another area office agreed with the assessment stated above and identified several other factors, such as BIA central office organizational problems, inadequate teacher selection processes, cumbersome civil service recruitment of teachers, employment ceilings, aging and inadequate facilities, and lack of understanding of Indian problems by BIA policymaking officials.

Officials at two of the seven BIA-operated schools stated that poor student attendance was a major hindrance to more rapid academic progress. For example, in 1975 at 1 Indian high school receiving funds under the Elementary and Secondary Education Act, only 115 of 279 students were present to take an academic achievement test at the beginning and end of the school year and many of these students missed a considerable number of days of schoolwork.

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BIA's actions concerning the need for special education programs, training to compensate for English communication handicaps, professional counseling services, and substitute teachers are discussed in detail below.

Special education programs

During our current review, we found that BIA was not operating its own program for providing special education for handicapped Indian children, even though BIA studies indicated that Indian children suffer from a higher-than-average incidence of hearing loss, vision difficulties, and other handicaps. Limited special education was carried out with some funds obtained from the Office of Education,

Department of Health, Education, and Welfare. However, such funds were inadequate to meet the needs of Indian students.

Our April 1972 report pointed out that officials at schools we visited stated that special education programs were needed for students with physical, sensory, mental, or emotional handicaps. However, adequate data was not available concerning the extent of the handicaps and the specific types of special education needed.

Although BIA officials in 1972 had estimated that the number of Indian children in their schools needing special education was at least double that normally found in public schools and might be as high as 50 percent of total enrollment in off-reservation boarding schools, 6 of the 12 schools we visited at that time had not established any special education programs. Officials at several of the other schools also stated that their special education programs were not adequate.

On April 7, 1976, BIA's Director of Special Education presented to the 54th annual convention of the Council for Exceptional Children a research and evaluation report on BIA's special education efforts for American Indian and Alaskan Native children. The report pointed out that of the approximately 50,000 students in the nearly 200 BIA-operated schools, an estimated 19,000 need special education. Concerning BIA's efforts to meet these needs, the report as well as other BIA documents pointed out the following:

- Special education over the past 9 years had been operated almost entirely with funds from the Office of Education. The use of such funds has limitations because (1) employees hired must, of necessity, be temporary and as a result, good teachers look for permanent positions elsewhere causing problems with continuity of programs and (2) the administration and others tend to look at programs funded with such funds as supplementary rather than as basic and, as a result, may consider them less important.
- Each year since 1972, the Office of Indian Education Programs had sought "line item funding" for special education in BIA schools but had not been able to obtain it.
- BIA had not established regulations concerning education of the handicapped.

--About \$12 million would be needed for the first year of a full-funded program of education of handicapped Indian students. The Office of Indian Education Programs estimated in its budget request for fiscal year 1978 that 400 additional permanent positions would be needed to carry out the program.

With respect to BIA failure to implement special education programs for Indian students, the report stated:

"Although special education as a budget item has been requested each year since 1972, such categorical funding has not been approved for BIA education as of the present. The reasons for this have been a budget-conscious administration and, perhaps the fact that we have been without a permanent Director of Indian Education Programs. We will work with our new Director * * * to see if this can be accomplished in the future. At the same time, attention will continue to be given to the establishment of regulations mandating special education in BIA schools."

The Office of Indian Education Programs, in its budget request submitted to BIA for fiscal year 1978, requested, as in the past, line item funding for special education. The request pointed out that to begin a special education program in fiscal year 1978, a net increase in funding of \$19,000,000 would be required, including an additional 400 permanent positions. BIA, in its budget request for fiscal year 1978 submitted to the Department of the Interior, reduced the requested funding to \$1.5 million and 60 positions.

Six of the seven schools we visited during our current review had special education programs. Several of the officials at these six schools stated that special education needs still exceeded available funding. Programs at five of the schools were funded with moneys obtained from the Office of Education. The sixth school sent their students needing special education to clinics in the local school district which provided needed training. The seventh school was a post-secondary vocational education school which was established to provide occupational and related training necessary for Indians to develop the skills needed to obtain employment, such as a printer or dental assistant.

English communication skills

Our April 1972 report noted that although the standardized achievement tests at the 12 schools we visited indicated that about 95 percent of the students were deficient in English

communication skills, only 1 of the schools had established an adequate compensatory training program to overcome the students' deficiencies.

Nine of the other schools had established compensatory communication training programs which were often referred to as reading laboratories and involved the use of various types of special audiovisual equipment. These programs were usually funded through Office of Education grants under the Elementary and Secondary Education Act of 1965, which were restricted by law to a limited number of students. For example, of the 47,547 Indian students eligible for programs funded under this act in fiscal year 1975, only 30,077 were able to be selected for the programs.

Officials at the four area offices and seven Indian schools visited during our current review stated that Indian children are still handicapped by the lack of English communication skills. (The Office of Education pointed out in December 1973 that 40,000 Navajos, nearly a third of the tribe, were functional illiterates in English.) The officials stated that because English is still a second language to many Indian students, academic progress is not as rapid as it should be.

Counseling services

Our April 1972 report pointed out that BIA's guidance programs generally had emphasized dormitory administration in boarding schools and had not provided Indian students with a broad range of professional counseling services, including academic counseling. The counselor's activities had been concerned primarily with social and personal problems of the students.

Officials at three of the seven schools visited during our current review stated that they were unable to provide the professional counseling services needed because they did not have enough qualified counselors. An official at one of the schools stated that because the school had more critical problems to deal with, adequate efforts could not be taken to provide the professional counseling services needed by Indian students. Officials at three other schools stated that they had a sufficient number of counselors and that the academic counseling services provided to Indian students were adequate. The seventh school, which was an elementary school, did not have any counselors.

Substitute teachers

Availability of substitute teachers to assume responsibility for classes when regular teachers were absent continued

to be a problem at BIA schools. Although our April 1972 report pointed out that 10 of 12 schools visited did not have adequate provisions for obtaining substitute teachers, BIA had not issued any instructions to the schools to insure that adequate provisions were established.

Officials at the seven schools visited during our current review stated that they still have problems hiring substitute teachers. The major problems identified by these school officials were the complicated procedures that must be followed in hiring substitute teachers and the lack of qualified teachers in nearby communities. Area office officials at two locations stated that at high schools and larger elementary schools, the problem is less severe because supervisory teachers or teachers within the same department can fill in for an absent teacher.

An official at one of the area offices stated that he did not know the extent of the substitute teacher problem because he relied on the local Indian agencies' offices to control substitute teachers. According to officials at two other area offices, a much more serious problem is unfilled teaching positions at the start of the school year. One of the officials stated that providing adequate instruction is very difficult because a number of classes have teacher vacancies at the same time. He stated that these vacancies result from the long process of complying with civil service hiring regulations; slow BIA processing of necessary personnel paperwork; and the reality that BIA teachers, as civil service employees, can quit, retire, or transfer on short notice, thereby leaving a vacancy. He pointed out that in contrast, teachers in the public school system sign contracts which commit them to work the entire school year.

Area office officials at two locations stated that under BIA's current practice, most teachers are hired without a personal interview and start teaching without any formal orientation or training regarding Indian customs.

NEED TO IMPROVE BIA'S MANAGEMENT INFORMATION SYSTEM

In our April 1972 report, we recommended that BIA develop a management information system providing (1) meaningful and comprehensive information on the academic aptitude and achievement level of students in the BIA school system and (2) program-oriented financial management reports geared toward the management needs of BIA education program officials. In responding to our 1972 report, the Department stated that BIA would work with all levels of school management to design

and implement a system which would incorporate existing data with data collected about pupils, property, program, and community and that the output from the information system would be custom designed to meet the requirements of all users of BIA educational information.

Although BIA had made some changes in its management information system since our 1972 report, BIA education officials stated that the present management information system still does not provide the program data they need, such as program-oriented financial data and student testing data.

More effort is, therefore, needed to develop an effective system designed to meet the needs of the BIA education program managers. Such a system is essential for developing, implementing, and evaluating an effective educational program. It could provide BIA officials with essential data for (1) identifying educational needs, (2) designing programs for accomplishing desired education goals, (3) budgeting and allocating resources to support needed programs, and (4) evaluating costs and benefits of these programs in relation to planned educational goals.

During our current review, we noted that the BIA Office of Indian Education Programs had made little progress since 1972 in improving its management information system. BIA education officials cited inadequate BIA computer capability and minimal user involvement in implementing new systems as the reasons for limited progress in this area.

An April 15, 1976, BIA research and evaluation report stated that significant improvements in education information cannot be made unless the present BIA computer system is modernized. The report also pointed out that while the relationship between the BIA Computer Center and Office of Indian Education Programs had improved greatly over the previous years, education work over the years had been given low priority by the BIA Computer Center. A BIA education official said modernization of the computer system is under study, but the complete implementation of any updating of this system will take several years.

In responding to our 1972 report, the Department stated that BIA would develop an educational management information system by undertaking activities in the following areas: (1) financial management, (2) pupil accounting, (3) staff or personnel reporting, (4) curriculum or program information, and (5) student testing.

Financial management system

In our April 1972 report, we stated that BIA officials did not know by whom or for what purposes the BIA school system operating costs had been used and how much of the operating costs had been incurred by each of BIA's schools, agency offices, and area offices. The officials did not receive any financial management reports which would readily provide this data. We also noted that they did not receive financial management reports which would show how much operating costs had been incurred for education activities, such as administration, curriculum development, instruction, pupil-personnel services, support services, and dormitory operations.

Although the Department, in responding to our 1972 report, advised us that BIA's Office of Indian Education Programs requested a restructure of assigned cost account codes, BIA education officials said in August 1976 that BIA did not revise the account codes as they requested. The officials stated that they still do not receive adequate financial management reports because the revised cost codes, which consolidated many former codes to provide for uniformity of BIA-wide budget data, do not provide enough program detail for education activities. They cited as an example that the current cost structure does not provide data on curriculum development or separately identify instructional costs of summer programs for the BIA schools.

Pupil accounting system

A segment of the pupil accounting system--the student enrollment system--had been implemented for the first time in the 1975-76 school year. The student enrollment system includes basic student information, such as the student's name, address, grade, and school attended. The system also provides reports on the number of student transfers, withdrawals, graduates, average daily attendance, and enrollment. This data is available by grade for individual schools and is totaled by agency, area office, and bureau level. According to BIA education officials this system is designed for statistical reporting purposes and not for management information purposes. The officials stated that the data from this system was only 85 to 90 percent reliable and efforts were underway to improve the reliability factor.

The student enrollment system is only a partial development of a pupil accounting system. A December 1972 BIA research and evaluation report notes that a pupil accounting system should include, besides enrollment and attendance data, additional information, such as class

scheduling, grade reporting, permanent student records, and test scoring and analysis. A BIA area office official stated that such a system would be useful to top management for program planning, assessment of student needs, and tracking student progress. He stated further that the present manual student records' system is difficult to summarize for top management use.

Staff or personnel reporting system

BIA education officials said that the staff reports they receive contain a listing of personnel by BIA area and schools that includes only the employees' names, position titles, grades, and salaries. The officials stated that the staff reporting system

--does not summarize and categorize information by education speciality and position title and

--is not accurate or timely enough for management control of personnel, the most expensive resource in education.

A central office education official stated that a staff reporting system for education should include information on academic and teaching credentials, teaching assignments, and personal background.

Curriculum or program information system

Central office education officials stated that the curriculum or program information system is still in the developmental stages. According to one of the officials, the standardization of terminology for curriculum and instruction has not been accomplished. He stated that standardization of terminology is difficult because BIA does not have a system to identify the curriculums being used at each school.

Student testing program

Our 1972 report stated that BIA records did not contain sufficient information for determining the actual progress being made toward the goal of raising the academic achievement level of Indian students to the national average nor did it have an overall student testing program for obtaining this information. Education officials at each area office decided on the testing program to be followed by schools under their jurisdiction. Test results, however, were not compiled and evaluated at the central office.

Education officials at the central office advised us, at the time of our 1972 report, that they were in the process of developing a BIA-wide testing program.

During our current review, we found, however, that since 1972 BIA had not completed the development and implementation of a BIA-wide testing program. A BIA education official said that a BIA-wide testing program had not been developed because of the lack of emphasis placed on such a testing program by the BIA education leadership. Efforts have been made to measure student progress; however, these efforts have been uncoordinated and test results are not currently part of the BIA management information system.

As a result of a 1973 task force study, BIA revised its official policy on pupil evaluation and testing through an April 1974 BIA Manual release. Under this new policy, BIA advocates measuring educational achievement and human development, whenever possible, through the use of criterion-referenced tests instead of norm-referenced tests. Norm-referenced tests are still recommended for diagnostic purposes.

Criterion-referenced tests are designed to assess the progress that each individual student has made with respect to an established standard of performance. Norm-referenced tests are used to compare one individual with another individual or group rather than against a standard of performance.

The seven schools we visited during our current review were using norm-referenced tests. Only one of these schools was also using criterion-referenced tests. In addition, there was no uniformity among area offices on the types of norm-referenced tests schools were required to use. For example, the Phoenix area office primarily used the California Achievement Test, the Navajo area office used the Metropolitan Achievement Test and the Science Research Associates Tests, the Aberdeen area office used the Science Research Associates Tests, and the Albuquerque area office used the Stanford '73 and California Test of Basic Skills.

As was the case at the time of our 1972 report, the results of norm-referenced tests were not compiled and evaluated by central office officials. A BIA education official said that the BIA schools' use of different norm-referenced tests does not permit statistical comparisons between tests.

CHAPTER 3

CONCLUSIONS, RECOMMENDATIONS, AGENCY COMMENTS, AND OUR EVALUATION

Although the Department of the Interior, in responding to our April 1972 report, stated that the conclusions and recommendations would constructively support Bureau of Indian Affairs efforts to improve its education program, we found little evidence during a current review that BIA made progress since 1972 toward improving educational achievement of Indian children. The problems identified in our 1972 report still existed, and BIA had not taken appropriate action to implement our recommendations.

Indian education has been defined as an educational process that is designed to fill the gap between Indian culture and the non-Indian culture. However, BIA Indian education had not been designed to fill the gap. At the time of our April 1972 report, BIA's major goal was to close the educational achievement gap between Indians and non-Indians. However, BIA never did communicate this goal to area offices and schools, nor did BIA ever design and implement a specific plan of action by which it intended to achieve the goal.

Further, although recommended by a BIA task force in 1971, BIA has never updated the goals published in the BIA manual in 1953 to define more accurately what constitutes adequate Indian education for the 1970s. Although there are numerous constraints to improving academic achievement, such as the need for special education for a higher-than-average incidence of students handicapped by hearing loss, vision difficulties, and other problems, BIA has not provided any instructions to area offices and schools for dealing with the constraints. Moreover, about 19,000 of the 50,000 students in BIA schools suffered from some type of handicap but BIA did not provide funding nor did it operate a separately identifiable special education program. A limited program was carried out with some funds obtained from the Office of Education. However, such funds were inadequate to meet the needs of Indian students.

BIA made some changes in its management information system since our 1972 report; however, the system still does not provide education program managers with the information they need to (1) assess the specific educational needs of Indian students, (2) identify the major problems that must be dealt with, (3) devise the specific strategy for overcoming these problems, (4) implement an education program responsive to students' needs, (5) measure progress toward

goals, and (6) assess the effectiveness of each responsible level within the BIA school system in achieving educational goals.

As stated in our 1972 report, the magnitude of the Indian education problems and the complexity of the problems make it essential for BIA to have a well-organized and managed program specifically designed to meet the needs of Indian students. As was the case at the time of our 1972 report, we did not find evidence that BIA had established realistic goals and objectives or implemented comprehensive educational programs to meet the needs of Indian students.

As a result, the major national goal established by the Congress to provide the quantity and quality of educational services and opportunities which will permit Indian children to compete in the careers of their choice is no nearer to being achieved than it was 4 years ago. Such goals will not be achieved until BIA places greater emphasis on developing and following comprehensive policies, procedures, and practices designed to identify and meet the needs of Indian students.

RECOMMENDATIONS TO THE
SECRETARY OF THE INTERIOR

We are repeating the substance of our prior recommendations to the Secretary of the Interior that the Commissioner of Indian Affairs be required to:

- Determine the educational needs of Indian students so that appropriate programs can be designed to meet the needs.
- Establish realistic goals and objectives for meeting the needs, and clearly communicate the goals and objectives to all operating levels in BIA, including schools.
- Develop a comprehensive educational program which includes specific policies, procedures, and practices to overcome the obstacles which impede progress in meeting established goals and objectives.
- Monitor and evaluate the implementation of established educational goals and programs at all operating levels of the agency.
- Develop a management information system that will provide

1. Meaningful and comprehensive information on the academic aptitude and achievement levels of students in the BIA school system.
2. Program-oriented financial management reports to meet the management needs of BIA education program officials.

MATTERS FOR ATTENTION
BY THE CONGRESS

Since BIA has made no major progress over the last several years in implementing policies, procedures, and programs to insure that the educational needs of Indian students are met, the congressional committees should more intensively monitor BIA and, if adequate progress is not made, explore other alternatives such as transferring responsibilities for administering Indian education programs to another Government agency.

AGENCY COMMENTS AND OUR EVALUATION

By letter dated December 13, 1976 (see app. III), the Department of the Interior concurred with our findings, conclusions, and recommendations but noted some exceptions as discussed below. The Department also pointed out some new "program direction" under consideration by BIA.

1. The Department stated that BIA agreed that a needs assessment tied to program cost is critical to help in determining viable directions in Indian education. The Department stated that BIA had conducted a few specialized education needs assessments and had developed plans to have the Office of Education identify BIA needs as part of a national needs assessment for Indian children. The Department stated that this should eliminate needless duplication of effort and help establish a national profile of educational need for Indian children.

After receipt of the agency's letter, we discussed these matters with BIA's Director, Office of Indian Education Programs. He stated that on December 13, 1976, he urged the Office of Education to revise its plans for a national needs assessment to include BIA schools. He stated that, although Office of Education officials did not formally agree to identify BIA needs, they were receptive to his proposal. He stated that BIA would continue to "fight" for participation in the national needs assessment.

We believe that, because of the importance of establishing education programs that will meet the educational needs of students in BIA schools, BIA should consider other alternatives to identifying the needs.

2. The Department stated that BIA agreed with our recommendations that realistic goals and objectives should be established and clearly communicated to all operating levels in BIA, including schools. The Department stated that BIA proposed to establish goals by placing the process squarely at the community or tribal level. The Department stated that each tribe, school, and/or community will be asked to develop its own set of educational goals and that the sum total and range of the locally developed goals will then become those of BIA.

To insure that this approach will produce meaningful results, BIA must develop formal guidelines and instructions for the local groups to follow in setting their educational goals. As pointed out on page 7 of this report, BIA had not developed guidelines and instructions and the Director of BIA's Office of Indian Education Programs did not know when such guidelines and instructions would be issued.

3. Concerning our recommendation that a comprehensive education program be established, the Department stated that in past times BIA had what could be considered a comprehensive education program but it was now in serious need of updating. The Department stated that BIA's current efforts to improve its education program included requests through its budget process to increase the limited funding of individual practices, such as early childhood education. The Department stated that BIA's current limited practices had been supported by funds obtained from the Office of Education and that many school systems must consider programs, such as early childhood education, as necessary offerings of a total school program.

Although individual practices, such as early childhood education, are important, we believe that BIA must overhaul all of its education activities to develop a comprehensive education program that will meet the needs of all Indian students. To establish such a comprehensive education program, BIA must (1) determine the educational needs of Indian students in BIA schools, (2) set realistic goals for meeting the needs, and (3) establish policies and procedures to insure that all program activities are designed to accomplish the established goals, including any programs implemented at local levels.

4. The Department, in discussing our recommendation for monitoring and evaluating the implementation of established goals at all operating levels, stated that to do this effectively would require changes in the structure of BIA. The Department stated that a recent reorganization of the BIA's Office of Indian Education Programs had created one complete unit devoted to providing technical services and monitoring programs. The Department also stated that in the future additional organizational changes will be needed and that as BIA moves into tribally run and operated programs, BIA's role will focus on monitoring and evaluating.

We believe that BIA should establish a more active and ongoing monitoring and evaluating program for education as one of its priorities. This program should include procedures for periodic visits to individual schools and area offices and written reports on these visits. Such a program is critical to insure that education activities are meeting student needs.

5. Concerning our recommendation for improving BIA's management information system, the Department agreed with our assessment of the system and stated that there is no quarrel with the finding that BIA's education program is in dire need of a modern computerized information system. The Department stated that a priority goal of BIA's new direction is to infuse the system with accountability and that plans are underway to achieve this goal.

Concerning including information on the academic aptitude and achievement levels of students in the information system, the Department stated that, as a result of its new testing policy which endorses criterion-referenced tests and the general negative perception of norm-referenced achievement testing, BIA has not aggressively pursued implementation of a national testing program. The Department stated that according to current thinking, norm-referenced tests are considered culturally biased and are not in the best educational interests of the Indian child.

We believe that the effectiveness of BIA education efforts, including needs assessment, cannot be adequately determined without some system for measuring student progress on a BIA-wide basis. We believe such a system must be included as part of BIA's efforts to improve its management information system.

6. The Department stated that the role of BIA " in the future, as determined by the Congress and Indian communities of the country, is to support and strengthen Indian self-determination." The Department stated that "self-determination in education means that tribes should decide education issues and programs." The Department stated that BIA's role would be that of providing technical services but that the full meaning of such services, at this point, is not clearly known.

We believe that as more tribes move to decide their own education issues and programs under self-determination agreements, it will be imperative that BIA insure that (1) the educational needs of Indian students are clearly identified and (2) realistic goals, objectives, and programs are established which will provide educational opportunities that enable Indians to compete in the careers of their choice. Under self-determination BIA monitoring and evaluating activities should be set as one of its top priorities.

CHAPTER 4

SCOPE OF REVIEW

Our review was carried out primarily at BIA Headquarters offices, located in Washington, D.C., and Albuquerque, New Mexico; at BIA's Aberdeen, Albuquerque, Navajo and Phoenix area offices located in Aberdeen, South Dakota; Albuquerque, New Mexico; and Window Rock and Phoenix, Arizona, respectively; and at seven schools under the jurisdiction of these area offices. The seven schools visited included two elementary and secondary day/boarding schools, three secondary boarding schools, one elementary day school, and one post-secondary boarding school. We had visited two of the secondary boarding schools during our prior review.

We reviewed applicable policies, regulations, procedures, and practices pertaining to administration of BIA's school system at the headquarters offices, area and agency offices, and school levels. We examined reports and documents and interviewed BIA officials and school administrators concerning the matters covered in our 1972 report. We also examined a number of studies and research projects dealing with Indian education.

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May 11, 1976

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The Honorable Elmer B. Staats
 Comptroller General of the United States
 The General Accounting Office
 Washington, D. C.

Dear Sir:

I am writing to request an immediate audit and investigation of the schools operated by the Bureau of Indian Affairs. This request is made on the basis of a number of documents and statements which have been made available to the Committee by various individuals involved with these schools.

These statements include allegations that:

- (1) the costs of administering and maintaining these schools are excessively high:

(for example, BIA has responsibility for 77 boarding schools -- 18 off-reservation and 59 on-reservation); 117 day schools and 19 dormitories in which students live who attend public schools. The FY 1976 appropriation for BIA to operate these schools was \$156,252,000 to which should be added an additional \$20,000,000 in transfer monies from the Office of Education to fund various supplementary education programs. BIA's estimated enrollment is 51,000).

- (2) enrollment figures are exaggerated in order to increase reimbursements;
- (3) there is a lack of long-range planning, proper educational needs assessment and adequate curriculum to meet the special and individual needs of the youngsters served by these schools;

(for example, 65% of the enrollments of the off-reservation boarding schools, we were told by the BIA, are social referrals with serious problems. For the most part, special services are not available to youngsters).

- (4) there is lack of adequate data collection from the schools and the 12 BIA Area Offices; by the Albuquerque Central Office (i.e., the Indian Education Resource Center); and by the BIA Education Office in Washington, D. C.
- (5) there is poor general administration and poor maintenance of the schools which is prevalent throughout the school system. Further, there is underutilization of the BIA schools in certain areas while public schools located nearby are heavily overcrowded; and that
- (6) there is poor monitoring of the use of federal monies made available under the programs administered by the U. S. Office of Education.

I am concerned, as well, about the allegations that severe problems of security and violence exist at the Intermountain Boarding School in Brigham City, Utah, and that the same problems exist at the Many Farms Boarding School on the Navajo Reservation in Arizona and elsewhere. I would, therefore, appreciate some attention paid to the conditions at these schools.

I would like to stress, however, that my principal concern is that a thorough analysis be conducted of the costs of operating all of these schools. I would like to know the costs involved in administering and maintaining these schools and the costs involved in providing actual instruction. I have attached a detailed listing of items which should be checked into. Additionally, I would like to see a comparison between the costs involved in operating comparable institutions and those involved in operating BIA schools, especially a description of any additional expenses due to the requirement that their employees must be included in the Federal Civil Service System.

I am aware that the GAO conducted an audit of BIA boarding schools in 1972. But, as I understand this audit, it was concerned exclusively with the type of educational program being offered by the schools and did not concern itself with administrative and other costs. I am requesting not only an audit of the educational programs which are offered, but also of the administration and general operation of these schools, and the utilization of

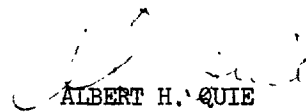
facilities. I want to be able to track from the information provided by your report whether there are inequities involved in the distribution of school construction monies, education monies and the like. I want to know where these monies are going -- and most particularly, how much money is spent at the administration level. I would like you to make a thorough check into allegations that millions of dollars which should be expended for education are being retained by BIA at the various administrative levels -- whether it be Area Offices, Agency Offices, the Albuquerque Office or Washington D. C. Office.

It is our Committee's intent to involve ourselves in extensive oversight investigation, as well; and I respectfully request that you complete the audit of these schools within the next six (6) months so that the information we seek will be available when the Committee begins its oversight hearings. I will be pleased to have staff share materials with you, and request that your staff work very closely with the staffs of our Committee in developing plans for and in carrying out a comprehensive audit and investigation of the BIA schools. Staff personnel is listed below.

Thank you very much for your cooperation and immediate attention to this matter. It is my hope that this GAO investigation will lead to improvements in the educational quality being offered to Indian students in these schools.

With all good wishes, I am

Sincerely yours,



ALBERT H. QUIE
Member of Congress

AHQ:fst

Staff Person:

Yvonne Franklin
Suite 1040, Longworth House Office Building
Telephone: 225-7101

GAO note: Attachment not included.

PAUL J. FANNIN
ARIZONA

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June 10, 1976

The Honorable Elmer B. Staats
Comptroller of the United States
General Accounting Office
General Accounting Office Building
441 G Street
Washington, D. C. 20548

Dear Comptroller Staats:

I have been advised of the request by Congressman Albert Quie for a GAO audit of the schools operated by the BIA. In view of my long interest and concern for a quality Indian education program, it is my opinion that such an audit should be given priority.

Your assistance to Mr. Quie and his staff would be most appreciated as I believe this audit is long overdue and much needed in our continuing efforts to assure a quality Indian education program.

With kindest regards.

Sincerely,



Paul Fannin
United States Senator

PF:rlm



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

DEC 11 1976

Mr. Henry Eschwege
Director, Community and Economic
Development Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Eschwege:

This is in response to your report entitled, "Concerted Effort Needed to Improve the Quality of Education in Schools Operated by the Bureau of Indian Affairs."

For purposes of the response, a distinction needs to be made regarding the levels of operation of BIA education and the report findings. It is understood that the report deals in important detail with the failure of educational leadership in the BIA, both at the national and area levels. The audit did not cover the program developments that were carried on at the school and/or community level during the 1972-1976 period. There were many improvements in BIA education at the community level and some of these will be mentioned in this response.

In general, the Bureau agrees with the report but does have a few exceptions and would, in addition, like to describe new program direction currently being mounted. The Congress has clearly expressed its view that Indian education will be controlled at the local level in the Indian Self-Determination and Education Assistance Act of January 4, 1975. Section 2b of that Act reads as follows:

"(1) true self-determination in any society of people is dependent upon an educational process which will insure the development of qualified people to fulfill meaningful leadership roles;

"(2) the Federal responsibility for and assistance to education of Indian children has not effected the desired level of educational achievement or created the diverse opportunities and personal satisfaction which education can and should provide; and

"(3) parental and community control of the educational process is of crucial importance to the Indian people."



The Bureau's response to your specific recommendations follow. For convenience, the recommendations of the report, as listed on page 30 of the draft report, will be followed in structuring the response.

1. "Determine the educational needs of Indian students so that appropriate programs can be designed to meet the needs." The Bureau agrees that a needs assessment tied to program cost is critical to help in determining viable directions in Indian education.

The BIA has conducted several specialized education needs assessments and has developed several models to be used for this purpose. Those which had been completed included the Oklahoma Indian Education Needs Assessment (February, 1976), Alaskan Native Needs Assessment in Education (1974), and the Bilingual Needs Assessment (October, 1975). These, combined with research and evaluation research, provide substantial descriptions of educational need.

The Congress should be aware that the Bureau has already made progress toward a national needs assessment in education. Plans for the assessment have been developed and relationships have been established between BIA and the United States Office of Education (USOE). Office of Indian Education (OIE). OIE is currently conducting a national needs assessment and it is planned that the BIA needs will be identified as part of it. Conducting a BIA needs assessment in cooperation with USOE eliminates needless duplication of effort and helps in establishing a national profile of educational need for American Indian children. This national profile would transcend governmental agency boundaries and thereby be of greater assistance to the Congress.

2. "Establish realistic goals and objectives for meeting the needs, and clearly communicate the goals and objectives to all operating levels in BIA, including schools." The Bureau agrees with this recommendation and is mounting efforts to meet it. This is the era of Indian self-determination and there is no place where it plays such an important role as in the establishment of goals. The approach being utilized for developing educational goals places this process squarely at the community or tribal level. Each tribe, school and/or community will be asked to develop its own set of educational goals. In effect, the sum total and range of locally developed educational goals will become those of the Bureau of Indian Affairs. The planning mechanism that has been implemented by the Bureau is directed to the individual schools, which are being asked to plan their education program, starting with the development of a set of goals. We believe that the GAO report supports this move within the BIA.

It is important to understand the relationship between the national needs assessment and the local determination of programs. Financial and program support for local initiatives will come from the Central Office of the Bureau of Indian Affairs. The national assessment is for the purpose of

identifying indicators that can be used to gain support for what to expect as a result of local initiatives. A national needs assessment will not determine what will take place at the local level. However, a sound comprehensive national needs assessment provide the framework for identifying local needs.

3. "Develop a comprehensive educational program which includes specific policies, procedures, and practices to overcome the obstacles which impede progress in meeting established goals and objectives." The Bureau has had in past times what one could consider a comprehensive education program, but it is now in serious need of updating. The audit report correctly points out that the current set of goals dates back to 1953. Current efforts to modernize the education program include such proven practices as bilingual-bicultural education, early childhood education, special education (handicapped) and special efforts to infuse the curricula with culturally relevant materials. There have been special thrusts developed in each of these programs, and requests for increased support have been forwarded through the Bureau's budget development process. The main focus of the current effort is to move the funding of such basic programs from non-Interior, supplemental sources (such as ESEA, Title I) to Interior appropriations. In this sense, the report correctly describes the Bureau's limited current practices which have been supported by USOE programs and funds. Many school systems must consider bilingual-bicultural programs, early childhood (parent-based) and education of the handicapped as necessary offerings of a total school or community program. The Bureau is moving to the point when these offerings will be considered a part of the regular program as contrasted to supplementary to it.

4. "Monitor and evaluate the implementation of established educational goals and programs at all operating levels of the agency." As has been pointed out in the report, to do this effectively will require changes in the structure of the BIA. Currently, only occasional monitoring and evaluation of programs occurs, and this is more often than not related to serious administrative problems. The BIA is planning to move out of the "fire fighting" and "crisis" orientation to that where there is valid ongoing monitoring and evaluation. Part of this move has already taken place in the reorganization of Central Office education. One complete unit of the new structure is devoted to providing technical services and monitoring programs. In the future, other organizational changes will have to be made in the Bureau so that field units can provide the direct contact for such activities. As the Bureau moves into tribally run and operated programs, its role will focus on monitoring and evaluation. This direction is related to the GAO recommendation that follows, which pertains to development of a management information system.

5. "Develop a management information system that will provide:

"1. Meaningful and comprehensive information on the academic aptitude and achievement levels of students in the BIA school system.

"2. Program-oriented financial management reports to meet the management needs of BIA education program officials."

The auditors correctly describe the BIA education plans regarding the development of a management information system. They were also correct in their understanding of the existing system and its limitations. It is important to note that the Bureau has developed plans to modernize the information system. The plans, currently being carried out, call for Bureau education to review the existing plans for adequacy and make the necessary adjustments in thrust and format. There is no quarrel with the finding that the Bureau's education program is in dire need of a modern computerized information system. Development of a new system is a high priority of the Education Office.

A priority goal of the new direction is to infuse the process and the system with accountability. In this sense, the primary aim is local Indian control wherein accountability would rest with the tribe, its school board and the local school administrator. Prepared plans are underway to make the changes in the system to achieve this goal.

In conclusion, regarding the management information system, we are in substantial agreement with the GAO's assessment of the Bureau's progress towards implementing a management information system.

The Bureau did undertake an updating of its testing program between 1972 and 1976. A comprehensive report was developed which was based on the work of a committee which met during 1972-1973. The outcome, which was reported in the 1976 GAO report, was a new section in the BIA field manual. The fact that a new testing policy was published in the manual is important, but more important is the new policy's meaning in relationship to the GAO report. The new BIA policy strongly endorses criterion based tests, as contrasted to standardized achievement tests which employ norms in scoring Indian children and are allegedly culturally biased. While the new policy does not rule out achievement testing as a method for evaluating effectiveness, it clearly places it in a position secondary to criterion-referenced tests. As a result of the testing committee report and the general negative perception of norm referenced achievement testing, the Bureau has not aggressively pursued implementation of a national testing program as recommended by GAO. According to current thinking, culturally biased tests (achievement tests, norm referenced) are not in the best educational interests of the Indian child.

CONCLUDING COMMENT

The entire report for 1976 as well as the entire range of programs in Indian Affairs must now be placed in a setting of self-determination. The perceptions or interpretations of the meaning of self-determination are many, but those of the Bureau are reflected in the Code of Federal Regulations and program descriptions. The GAO report interprets self-determination to mean that the Bureau will ". . . provide education services to Indians that will enable them to compete in the careers of their choice." The Bureau will continue to provide opportunities for development of skills leading to careers as well as resources for tribes to develop their own programs.

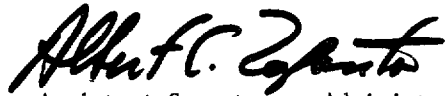
Self-determination in education means that tribes should decide education issues and programs. The most direct and clear example of self-determination is control. Control means that the tribe controls the school, including personnel, budget, and curriculum.

While new directions toward self-determination mean greater local control, this does not mean that the BIA has no program responsibility. The future role of the BIA will be that of providing technical services. The full meaning of technical services is not, at this point, known clearly, but it is reasonable to assume that it will contain elements of program expertise as reflected by tribal initiatives, evaluation and monitoring of tribal activities, and leadership or advocacy of Indian rights and needs. It is perhaps no longer possible, and it is certainly less fashionable, for the Bureau to assume a position of operating a strongly controlled program from the top down, which is implied in the GAO report. The role of the BIA now and in the future, as determined by the Congress and the Indian communities of the country, is to support and strengthen Indian self-determination.

To do this, the Bureau is making strong attempts to move decisionmaking in education as close to the school and community (tribe) as possible with actual tribal control the best form for doing it. Then, the BIA should provide strong support to tribes in carrying out their education programs. Certainly, one main role of the BIA is to provide financial support in the form of innovative programs which the tribe may wish to implement. The innovative programs which the BIA will support, will be based on contemporary thought, proven approaches and practices.

We appreciate the opportunity to comment on your draft.

Sincerely yours,



Assistant Secretary - Administration
and Management

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U. S. GENERAL ACCOUNTING OFFICE



THIRD CLASS