



Bureau of Indian Education

STRATEGIC DIRECTION TRIBAL CONSULTATION REPORT



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Consultation Introduction

Throughout 2017, Bureau of Indian Education (BIE) staff from all levels of the agency worked to prepare a Draft Strategic Plan Proposal designed to address the academic needs of Indian students and improve the Bureau's support and delivery of service to all BIE-funded schools. On October 17, 2017, early in the planning process, BIE initiated a series of meaningful and substantive Tribal consultation and listening sessions regarding the Draft Strategic Plan Proposal. The consultation sessions achieved the BIE's goal to engage and work collaboratively with Tribes, school boards, and other stakeholders and obtain their input and contributions. Upon conclusion of five Tribal consultation sessions and three listening sessions, the BIE began a process of substantive review and analysis of all submitted feedback and made significant substantive edits in response to the feedback received.

As part of its commitment to transparent communication and fostering a productive collaborative working relationship with Tribes, school boards, schools, students and other Indian education stakeholders, the BIE has prepared this Strategic Direction Tribal Consultation Report. The Report is broadly divided into two sections: (1) Input Incorporation Summary; and (2) Response Summary. Comments listed in both sections have been carefully edited for the purposes of brevity.

The Input Incorporation Summary is organized in relation to the Strategic Direction by Mission, Vision, Values, Goals and Strategies. Each of these components includes the original language contained in the Draft Strategic Plan Proposal, comments that were received that address the component, and the revised and/or language incorporated into the component derived from the comments received. Many comments have been incorporated into or have created new milestones or actions corresponding to the goals and strategies to which comments were initially directed. Comments and the revised language are color coded pursuant to the below included Color Key. In some instances, comments received through the consultation process resulted in entirely new components being added, as opposed to revising existing language contained in the Draft Strategic Plan Proposal.

Upon review of all submitted comments, BIE found that many did not directly relate to the Strategic Direction or, if related, did not correlate to a requested revision or addition. The Response Summary contains responses to such individual comments.

As the initial Strategic Direction process concludes, BIE emphasizes that as it works to put the Strategic Direction into action it will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year, the BIE will evaluate its previous year's progress and: (1) adjust planned milestones for the upcoming year, as necessary; (2) identify necessary additional actions to complete milestones; and (3) establish subsequent yearly milestones to support and expand existing work and identify new initiatives, where necessary. As part of each yearly evaluation of milestones and actions, the BIE will provide reporting information for Tribes, school boards, employees and other stakeholders to inform their feedback and input for the mid-cycle status update during Year Three. This process is intended to ensure transparent and ongoing collaboration and coordination with Tribes, school boards, employees and other stakeholders as future year milestones and actions are identified and implemented pursuant to the Strategic Direction's goals and strategies.

Strategic Direction Timeline

- **SEPTEMBER 2013** The Government Accountability Office (GAO) conducted a review of BIE management practices and published its findings and recommendations in GAO-13-774—INDIAN AFFAIRS: Better Management and Accountability Needed to Improve Indian Education. Recommendation 4 directed the BIE to draft and implement a strategic plan with stakeholder input.
- **JANUARY 2017** The BIE Director and other senior leaders tasked Central Office staff with reviewing outstanding GAO recommendations and identifying work plans necessary to address recommendations and improve service delivery to Indian students.
- **FEBRUARY 2017** GAO released its High Risk Report (GAO-17-317—High Risk Series) designating BIE as a high risk agency. The Report highlighted unresolved recommendations including the implementation of a strategic plan.
- **MARCH 2017** Central Office staff reviewed existing strategic plan proposals and materials and initiated a collaborative effort to create a Draft Strategic Plan Proposal. As part of this work, Central Office staff coordinated with education partners, such as the Council for Chief State School Officers (CCSSO), to analyze strategic performance management tools and resources utilized by state education agencies.
- **APRIL 2017** BIE hosted its initial BIE staff strategic planning session convening local, regional, and Central Office personnel to begin outlining and planning a strategic plan framework.
- **MAY 2017** Following the initial BIE staff strategic planning session, Central Office staff refined input submitted during the session to create an initial framework for the Draft Strategic Plan Proposal. Specifically, Central Office staff established a draft vision statement, mission statement, core values statement, and identified goals based on feedback from session attendees.
- **JUNE 2017** BIE began working in partnership with U.S. Department of Education funded comprehensive centers — the Building State Capacity and Productivity (BSCP) Center with support from the West Comprehensive Center and previous support from the South Central Comprehensive Center — to further its work in transitioning from an initial strategic framework to a more defined Draft Strategic Plan Proposal to be shared with Tribes, school boards, and other stakeholders for solicitation of meaningful review and input.
- **JUNE-SEPTEMBER 2017** BIE hosted additional strategic planning sessions with BIE staff to identify strategies aligned to goals and establish a rigorous communications plan for sharing and soliciting feedback regarding the Draft Strategic Plan Proposal with internal and external stakeholders as well as a timeframe for formal Tribal consultation.

- **OCTOBER 2017** BIE hosted informal listening sessions at National Indian Education Association (NIEA) and National Congress of American Indians (NCAI) events. During the listening sessions, BIE solicited and obtained substantive feedback and revised the Draft Strategic Plan Proposal accordingly. Additionally, BIE published formal notice for Tribal consultation in the Federal Register on October 14, 2017.
- **NOVEMBER 2017** BIE hosted two informal listening sessions at the Tribal Interior Budget Council (TIBC) meeting held in Washington, DC. BIE also began formal Tribal consultation on November 15, 2017 in Salem, Oregon and continued formal Tribal consultation on November 28, 2017 in Anadarko, Oklahoma.
- **DECEMBER 2017** BIE continued formal Tribal consultation on December 5, 2017 in Bismarck, North Dakota and completed the remainder of its in-person formal Tribal consultation sessions on December 12, 2017 in Albuquerque, New Mexico. A final formal Tribal consultation webinar was provided on December 14, 2017.
- **JANUARY 2018** Thirty days following the final Tribal consultation date of December 14, 2017, the deadline to provide feedback closed on January 13, 2018.
- **JANUARY-FEBRUARY 2018** BIE conducted a comprehensive analysis of all feedback and comments received through Tribal consultation. The BIE Director and other senior leaders reviewed the feedback analysis; finalized changes made in response to Tribal consultation comments and feedback; and approved the final vision statement, mission statement, core values statement, goals and strategies. Additionally, BIE leadership identified consultation comments and feedback to be incorporated into milestones and actions.
- **FEBRUARY 2018** BIE held two strategic planning sessions with school leaders, local and regional BIE staff as well as BIE Central Office personnel to identify milestones and actions, ensuring that all relevant Tribal consultation comments and feedback not incorporated in the vision statement, mission statement, core values statement, goals or strategies were incorporated in either milestones or actions. Additional milestones and actions necessary to effectively implement strategies and goals were also identified and incorporated into the Strategic Direction. Finally, BIE staff developed work strands and submitted suggested collaborative teams to carry out work identified for completion during Year One of implementation.
- **MARCH 2018** BIE Director and other senior leaders reviewed all milestones, actions, and recommended teams in order to identify and eliminate duplication and ensure effective coordination of effort. BIE then submitted the Strategic Direction to Department of the Interior leadership and GAO for review and approval.
- **APRIL-JUNE 2018** Central Office staff and its comprehensive center partners will work with each identified collaborative team to train, coordinate, and prepare to implement Year One work strands and performance management metrics associated with the Strategic Direction. Year One implementation begins on July 1, 2018, in conjunction with the 2018-2019 School Year.

Color Key:

Purple = Tribal Leader/School Board Representative

Blue = Tribally Controlled School

Green = BIE Employee

Orange = Stakeholder Organization

Yellow = Unidentified/Other

Consultation Input Incorporation Summary

Strategic Direction Element	Suggestions	Final Version
<p>Vision: The Bureau of Indian Education (BIE) is the preeminent provider of high quality educational services and supports to students¹ at BIE funded schools² to foster lifelong learning.</p>	<ol style="list-style-type: none"> 1. "...and supports provided by highly qualified educators..." [School Board Representative]. 2. "I think that the vision statement may be a little generic. I think that if we transitioned any school body or any school system into BIE, this would be for anybody, so it doesn't acknowledge the very unique role or the unique opportunity that the bureau has in supporting tribes and their wishes....if there is a way to weave that [culture] into the vision so it's not so generic, but it's very unique and special for the work of the bureau." [Educational Organization]. 	<p>Vision: The Bureau of Indian Education (BIE) is the preeminent provider of culturally relevant educational services and supports provided by highly effective educators to students³ at BIE funded schools⁴ to foster lifelong learning. <u>Page 15.</u></p>

¹ Throughout the remaining document, the word "students" refers to any student attending a BIE funded school.

² Throughout the remaining document, the word "schools" refers to BIE funded schools, including colleges and universities.

³ Throughout the remaining document, the word "students" refers to any student attending a BIE funded school.

⁴ Throughout the remaining document, the word "schools" refers to BIE funded schools, including colleges and universities.

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	<p>3. ...I think that the vision statement may be a little generic. I think that if we transitioned any school body or any school system into BIE, this would be for anybody, so it doesn't acknowledge the very unique role or the unique opportunity that the bureau has in supporting tribes and their wishes..." [Education Organization].</p>	
<p>Mission: The mission of the BIE is to provide students at BIE-funded schools with a culturally relevant, high-quality education that prepares students with the knowledge, skills and behaviors needed to flourish in the opportunities of tomorrow, become healthy and successful individuals, and lead their communities and sovereign nations to a thriving future that preserves their unique cultural identities.</p>	<p>1. "It doesn't make sense that the BIE supports students in the opportunities of tomorrow unless the schools are purposefully not teaching students what they need for today." [TC Superintendent].</p> <p>2. "...good but should somehow include future leader of our global society." [BIE Operated Employee].</p>	<p>No Change was made to the Mission statement; however, in light of the input received Goal 4 has been revised to "[a]ll students will graduate high school ready to think globally and succeed in postsecondary study and careers. <u>Page 26</u>.</p>
<p>Values: BIE employees carry out the mission to achieve the vision through guiding organizational principles underpinning how the work of the BIE is successfully accomplished.</p> <ul style="list-style-type: none"> ● Excellence: The BIE achieves success through continuous self-assessment and improvement. ● Focus: The BIE is student-centered, a commitment to addressing the holistic needs of students. ● Integrity: The BIE maintains high standards of character and professionalism as the foundation upon which the agency is built. ● Respect: The BIE fosters communities of support through mutual regard and collaboration. 	<p>No Comments Received. However, upon review this change was made for ease of readability purposes.</p>	<ul style="list-style-type: none"> ● Focus: The BIE is student-centered, a commitment to addressing the holistic needs of students.

Strategic Direction Element	Suggestions	Final Version
<ul style="list-style-type: none"> • Service: The BIE supports students through proactive and responsive teamwork with schools, tribes and communities. 		
<p>Goal 1: All students will enter kindergarten academically, socially, and emotionally prepared to succeed in school.</p>	<p>1. “Overall the BIE's goals and strategies for early childhood education are commendable. Focusing on early childhood education as a strategy for student success driven by prekindergarten expansion, kindergarten readiness and community engagement is a definite step in the right directions. The first goal's emphasis on kindergarten readiness is consistent with what we and other organizations, researchers and stakeholders believe about readiness and its role in expanding early childhood education.” [Education Organization].</p>	
<p>Strategy 1.1: If the BIE partners with early childhood development organizations and tribes to increase access and supports for high quality early childhood education, <u>then</u> barriers to accessing high quality early childhood education will be addressed, <u>and</u> all students will enter kindergarten academically, socially, and emotionally prepared to succeed in school.</p>	<p>1. “The plan proposes partnerships with early education development organizations, tribes, tribal colleges and universities. However, this is too limiting. There is great potential benefit from developing partnerships form non-profit organizations, tribally controlled, public and private k-12 schools, and public and private colleges and universities.” [TC Superintendent].</p> <p>2. “Not every child is prepared for school, lack of services and money, communities need more support for pre-k Increase Pre-K community and enrollment (screening, child find, baby face, number of classrooms, head start, home base assessments, outreach, Peep.” [Unidentified].</p> <p>3. “First Kids First, and it used to be called the Children’s Agenda, but it was a concept about</p>	<p><i>Strategy Explanation:</i></p> <p><i>Research has shown that collaboration with early childhood partners, such as families, family child care providers, tribes, Head Start, early Head start, tribal colleges and universities, and public and private pre-school programs have shown to impact the availability and quality of early childhood services and increase family and staff knowledge and skills on early learning. More children can have access to early learning experiences through strong partnerships focused on addressing the barriers to early childhood education. Partnerships can also improve the transition from preschool to kindergarten, so the experience is positive for both children and families. <u>Page 18.</u></i></p> <p><u>References and suggestions of specific programs, such as First Kids First, were not included in order to</u></p>

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	<p>rearing children at an early age, and here we have NEA, the National Education Association doing education. We have National Indian Health doing health. We have the National Indian Child Welfare Association protecting children. And there was that one, the last one, NIEA, National Indian Education Association.” [Tribal Leader].</p> <p>4. “...an MOU is needed on Head Start, and I guess it's public schools or grant schools, tribal schools where those MOUs need to be in place. I guess from a community leader's standpoint, it's really frustrating. I don't know why BIE has not taken the Head Start and tribal schools all as one. [Tribal Leader].</p> <p>5. It is also positive that the BIE mentions your intention to develop partnerships with early childhood education organizations and tribes.” [Education Organization].</p>	<p>allow maximum flexibility at the local level. <u>Determinations of specific programs are a local decision. Nonetheless, upon review of submitted input BIE has included the following milestones and actions to reflect these consultation comments:</u></p> <p>Milestone 1.1.1. The BIE has conducted a feasibility review of early childhood education organizations to establish potential partnerships and developed a plan for implementation. Page 36.</p> <p>Milestone 1.1.2. The BIE has established partnerships based on the feasibility review. Page 36.</p> <ul style="list-style-type: none"> ○ Action 1.1.2.1. Prioritize partnerships with Tribes/states for housing programs where gaps persist and identify top three partners. Page 36. ○ Action 1.1.2.2. Partner with Tribes, FACE, Head Start, Early Head Start, IHS, and public schools to expand services rather than create duplicative program based on a needs assessment and prioritization. Page 36. ○ Action 1.1.2.4. Create a task force to determine funding eligibility and apply for funds or look at partnerships at Tribal/local level. Page 36.
<p>Strategy 1.2 If the BIE provides services and supports to strengthen family school community connections, then there will be more opportunities for parents, primary caregivers and communities to engage in their child's learning as their first and most influential teacher and all students will enter kindergarten academically, socially, and emotionally prepared to succeed in school.</p>	<p>See consultation comments in Strategy 3.7.</p>	<p>Strategy 1.2 was moved to Goal 3 as Strategy 3.7 to ensure that family-school-community is emphasized throughout a student's education experience. <u>Page 25.</u></p>

Strategic Direction Element	Suggestions	Final Version
<p>Strategy 1.3 If the BIE establishes a BIE funded high quality pre-school initiative, <u>then</u> families, communities and schools will use the additional early education opportunity for students, <u>and</u> all students will enter kindergarten academically, socially, and emotionally prepared to succeed in school.</p>	<ol style="list-style-type: none"> 1. "...Strengthening non-academic environmental factors that consistently encourage innovative, challenging, and culturally competent learning..." [Education Organization]. 2. We would suggest including the preparation, support and ongoing professional learning of early childhood workforce as a strategy for achieving and maintaining high-quality early childhood programming. [Education Organizations x2]. 3. There is a prekindergarten initiative that could be imitated as a pilot and then expanded. This would be an appropriate way to develop best practices and then scale up. [Education Organizations x2]. 4. There should be mention of the need to require the use of research-based curriculum within the pre-k initiative or existing pre-K programming. [Education Organizations x2]. 5. "...recognizes and agrees on the importance of beginning a student's formal education as early as possible in a structured school setting, as well as including family and community involvement." [Education Organization]. 	<p>Strategy (renumbered) 1.2 <u>When</u> the BIE establishes a BIE funded high quality and culturally relevant pre-school initiative, <u>then</u> families, communities and schools will use the additional early education opportunity for students, <u>and</u> all students will enter kindergarten academically, socially, and emotionally prepared to succeed in school. <u>Page 18</u>.</p> <p><u>In addition to the above identified revision, BIE has also included the following milestones and actions to reflect these consultation comments:</u></p> <p>Milestone 1.2.1. The BIE has researched the necessary resources and partnerships for developing a high-quality and culturally relevant early childhood framework. <u>Page 36</u>.</p> <p>Milestone 1.2.3. The BIE has researched and developed a plan to support professional learning for the BIE early childhood workforce. <u>Page 37</u>.</p> <p>Milestone 1.2.4. The BIE has reviewed early childhood standards, curriculum, developmentally-appropriate practices, and assessments that are culturally-relevant for adoption in a preschool initiative. <u>Page 37</u>.</p>
<p>Goal 2: All students will develop the knowledge, skills, and behaviors necessary for physical, mental, and emotional wellbeing.</p> <p><i>Goal explanation</i></p>	<ol style="list-style-type: none"> 1. "On goal two, it doesn't mention anything in here about culture. And I know we have a tribal youth suicide prevention program and the goal of that is always to incorporate culture." [Tribal Leader]. 	<p>Goal 2: All students will develop the knowledge, skills, and behaviors necessary for physical, mental, and emotional wellbeing in a positive, safe, and culturally relevant learning environment. <u>Page 19</u>.</p> <p><i>Goal explanation</i></p>

Strategic Direction Element	Suggestions	Final Version
<p>...Access to school and community coordinated wellness supports and behavioral health services and supports for students and their families is of utmost importance.</p>	<ol style="list-style-type: none"> 2. "I would just suggest adding to the end, 'in an adequate learning environment.' I didn't make these comments down in Florida. I like the way it's worded, just adding in, 'in an adequate learning environment.'" [Tribal Leader]. 3. "We fully agree with prioritizing wellness, behavioral health and safety for native children and youth, but this section needs a more vigorous and specific narrative." [Education Organization]. 	<p><i>The physical, mental, and emotional wellbeing of students is an end in its own right; it is a critical foundation for success. Access to school and community coordinated wellness supports and behavioral health services and supports for students and their families, including but not limited to, partnerships, training, and resources, is of utmost importance. Knowledge, skills, and behaviors of wellbeing, including self-advocacy skills, should be intentionally taught and reinforced by well-trained and supported principals, teachers, and school staff. Safe, secure learning environments that have routines in place to maintain student safety and reinforce pro-social behaviors are also an important component of meeting the wellness, behavioral health, and safety needs of students. Page 19.</i></p>
<p>Strategy 2.1 If the BIE develops programs and supports for student wellness, <u>then</u> schools will provide proactive programs and interventions that foster an encouraging and supportive environment, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary for physical, mental, and emotional wellbeing.</p>	<ol style="list-style-type: none"> 1. "Our school needs a nurse, dietician, nutritionist, health coordinator, ... utilize/increase health promotion programs and wellness..." [BIE Employee]. 2. "We recommend including evidence-based guidelines for school meals." [Education Organization]. 	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 2.1.1. BIE has a comprehensive Wellness, Behavioral Health and Safety Report that includes the current status of student wellness programs, policies, practices, and resources as well as potential barriers for BIE funded schools. Page 38.</p> <ul style="list-style-type: none"> ○ Action 2.1.1.2. Define and identify specific wellness indicators based on culturally relevant current research and best practices. Page 38. <p>Milestone 2.1.2. BIE has developed the wellness component of a comprehensive wellness, behavioral health, and safety tool kit. Page 39.</p>

Strategic Direction Element	Suggestions	Final Version
<p>Strategy 2.2 If the BIE develops programs and supports for student behavioral health, <u>then</u> schools will implement a comprehensive behavioral health plan, programs and interventions that foster an encouraging and supportive environment, <u>and</u> all students will develop the knowledge skills, and behaviors necessary for physical, mental, and emotional wellbeing.</p>	<ol style="list-style-type: none"> 1. "...helping these kids therapeutically that are in the dorms. It's hard to focus in class and get everything that the teacher is putting out there. So, and that's one thing I feel like that we're lacking. Every school in America should have an LPC, you know. We as administrators or as counselors talk to the kids and that works, but there's some that are above what we can go, you know, life situations and I wouldn't want to push the wrong button." [TC Superintendent]. 2. "Talking about partnerships, suicide prevention training and they do a lot of training with local law enforcement...good in training some of the residential people but also the youth. We sent our interns through that training this summer when they were there and they loved it." [Tribal Leader]. 3. "One thing I've learned in recent – is the benefit of a teacher being able to recognize mental health issues. And so I think success having that knowledge available to staff and teachers so that when a student who might be in trouble we may be able to recognize that he needs someone to reach out to him or her... ...[a]nd on the other side of that, making it a priority to de-stigmatize mental health issues overall and make it a positive environment. I think you touched on that in your goals. But making it okay for young people to step forward with those issues can also affect the success." [Tribal Leader]. 4. "...many tribes had stigmatism about going and seeing mental health therapists. A lot of times they can use a native community 	<p>BIE has included the following milestones and action to reflect these consultation comments:</p> <p>Milestone 2.2.1. BIE has developed the behavioral health component of a comprehensive Wellness, Behavioral Health and Safety Tool Kit. Page 39.</p> <ul style="list-style-type: none"> ○ Action 2.2.1.1. Develop behavioral health component of the self-assessment for school/site use: training and professional development, services and resources currently available, and national, regional, and local partnerships. Page 39. ○ Action 2.2.1.4. Establish protocols for addressing behavioral health issues. Page 39. ○ Action 2.2.1.5. Include summary of ASCA school counseling model. Page 39. ○ Action 2.2.1.6. Establish a de-stigmatization campaign. Page 39. ○ Action 2.2.1.7. Develop strategies for schools to coordinate outreach programs for families and communities. Page 39. <p>Milestone 2.2.2. BIE has identified and/or developed behavioral health trainings specific to all levels of BIE (from School Level to Central Office). Page 40.</p> <ul style="list-style-type: none"> ○ Action 2.2.2.1. Review and analyze training, professional development, services, and resources currently available. Page 40. ○ Action 2.2.2.2. Identify national and regional partners from federal and Tribal agencies who can provide behavioral health training, support, and services to BIE funded schools. Page 40. ○ Action 2.2.2.3. Identify training needs, topics, (e.g., suicidal ideation crisis intervention, SCAN, basic counseling,

Strategic Direction Element	Suggestions	Final Version
	<p>mentorship type program from working in conjunction with that that might go into it.” [Tribal Leader].</p> <p>5. “...with regard to the mental health and to funding. It’s kind of scary when you do have kids at seven, eight years old and you are trying to deal with mental health issues, and they are dealing with drugs coming from home, from everywhere, and that’s the challenge that we all face.” [Tribal Leader].</p> <p>6. “Will there be Cooperative Unit Agreements with all the wellness, behavioral health and safety programs? Currently we have students that need behavioral health intervention and it’s difficult to find support for our students.” [Unidentified].</p> <p>7. “Behavior health programs need to be consistent among departments. Our school needs a school counselor handbook... a school psychologist... follow-up on students who get services at TCBS...” [BIE Employee].</p> <p>8. “Behavioral health, a lot of our kids don’t learn in the school system, because they have issues. So we need to identify what those are, and where do you start? With childcare, Head Start, early on when they had Child Find. Child Find does that, it identifies – I don’t know – disability, the challenges, I guess, if you will, that the kids have which are going to impact their learning. So that’s where you start.” [Tribal Leader].</p> <p>9. “...there is another area that we have concern about, that we talked about under one of the goals, about physical and mental, emotional well-</p>	<p>bullying, trauma and resiliency models, RTI, etc.) and associated participants. <u>Page 40.</u></p> <p>Milestone 2.2.4. BIE has developed a therapeutic school model. <u>Page 40.</u></p> <ul style="list-style-type: none"> ○ Action 2.2.4.3. Provide trauma-informed curriculum for all grade levels and postsecondary, including potential pre-K initiative. <u>Page 40.</u> ○ Action 2.2.4.4. Provide trauma-informed teaching practices for all grade levels and postsecondary, including potential pre-K initiative. <u>Page 40.</u> <p>Milestone 2.2.5. BIE has provided behavioral health trainings specific to all levels of BIE. <u>Page 40.</u></p> <ul style="list-style-type: none"> ○ Action 2.2.5.1. Provide suicidal ideation recognition and prevention training for superintendents, principals, teachers, faculty, students, and support staff (e.g., residential staff, food service, transportation). <u>Page 40.</u> ○ Action 2.2.5.2. Establish an updated and effective Memorandum of Understanding between BIE and partners. <u>Page 40.</u>

Strategic Direction Element	Suggestions	Final Version
	<p>being for students. We don't have control over these programs, and it would help if at your level, that you coordinate the services so that Indian Health does actually provide services to students within our schools..."</p> <p>"...the issues come from the home. If we can help coordinate, work together with families, that will make healthier students for us in the classrooms and it will be easier to deal with the behavioral type issues that students have..." [Tribal Leader].</p> <p>10. [In reference to pre-K] In addition, there is no discussion of the need for wraparound services or trauma-informed teaching practices for the high percentage of native children who are homeless or in foster care. [Education Organization].</p> <p>11. Examining the practical value of comprehensive behavior health (Goal 2: Strategy 2.2) curriculum plans and ultimately improving them. [Education Organization].</p>	
<p>Goal 3: All students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<p>1. "...you need to hit a little bit harder on – you know, we talk about post-secondary. That would be great if all of our kids could go to post-secondary. But realistically, we have to understand where we're at with our kids." [School Board Representative].</p> <p>2. "...so can that be an extension on your goal two [in full context of the comment, BIE believes the commenter meant to state goal 3] to add in addition to that create pathways after graduation?" [Tribal Leader].</p>	<p>Goal 3: All students will develop the knowledge, skills, and behaviors necessary to progress successfully through school and be prepared for post-secondary education and/or career opportunities. <u>Page 21</u>.</p>

Strategic Direction Element	Suggestions	Final Version
	<p>3. "...I think goal three could be improved. I don't think it's comprehensive enough...to me that says we just need to get them through school and that's not good enough...[t]o me the goal is not just to get them through school, it's to get them through school and knowing their dream job and helping them get out there and find the right whatever for their schooling or that they need, if they need further schooling. To me it just stops too soon..." [Education Organization].</p> <p>4. On the goal three...it's all about educational opportunities, giving our students opportunities that will help them to grow as an individual to be able to go on to a level of education..." [Public School Teacher].</p>	
<p>Strategy 3.1 If the BIE collaborates with schools to recruit, hire and retain highly effective principals, teachers, and staff, including those from local communities, <u>then</u> schools will have the instructional leaders, teachers and staff to provide highly effective, culturally-relevant instruction, services and supports, <u>and</u> all students will develop the knowledge, skills, and behaviors to necessary to progress successfully through school.</p>	<p>1. "...recruiting highly qualified teachers and educators. BIE funded schools... face an ongoing shortage of highly qualified and culturally knowledgeable teachers and educators. Due to the rural locations, lack of housing, poor infrastructure and transportation with low salaries, these schools have a difficult time recruiting and retaining teachers, staff, and administrators. [Tribal Leader].</p> <p>2. "As the BIE acknowledges in Strategy 3.1, students in schools with high staff turnover score lower in English language, arts (SIC) and math. Increased salaries and benefits would encourage employees to stay at BIE and tribally controlled schools. Offering housing options to employees could also increase employee retention rates. These incentives would also</p>	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 3.1.1. The BIE has conducted a joint study with interested BOS, Tribally controlled school and TEDs identifying and addressing barriers to community members serving as principals, teachers, and staff. Page 41.</p> <ul style="list-style-type: none"> ○ Action 3.1.1.1. Review Bureau-wide human capital study (including Tribally controlled schools). Page 41. ○ Action 3.1.1.2. Expand study to include at a minimum lack of housing, transportation, salaries, incentives and infrastructure. Page 41. <p>Milestone 3.1.2. The BIE has formalized a recruiting process to attract highly effective principals, teachers, and staff. Page 42.</p>

Strategic Direction Element	Suggestions	Final Version
	<p>assist schools in hiring high-quality employees.” [Tribal Leader].</p> <p>3. “...housing affordable and updated...” [School Board Representative].</p> <p>4. “Getting back to the teachers, the competition is going to really escalate, It already has as far as who is competing for teachers.” [Tribal Leader].</p> <p>5. “Are you having like teacher career fairs where you’re going out and trying to get those – especially those Indian students that majoring in education? And not only that, years ago there used to be kind of like some programs where they get their degrees and they go back and work for those facilities they received the degree from the schools. I don’t know if there’s any programs like that anymore.” [Public School Teacher].</p> <p>6. “BIE funded schools continue to face an ongoing shortage of qualified and culturally knowledgeable teachers. Due to rural location, lack of housing, low salaries, and poor working conditions, these schools experience high turnover rates among staff and administrators...[recommend] that these schools be provided with the necessary tools and professional development opportunities to train their staff and educators with an emphasis on recruiting teachers from the community.” [Education Organization].</p>	<ul style="list-style-type: none"> ○ Action 3.1.2.1. Collect data from schools on existing recruiting processes; identify potential protocols for recruitment. Page 42. ○ Action 3.1.2.2. Identify local resources – teacher education programs, relationships with local colleges, Tribal colleges, job corps, AmeriCorp, Teach for America, etc. Page 42. ○ Action 3.1.2.3. Develop a recruiting calendar (career fairs) – internal Bureau and outside community. Page 42. ○ Action 3.1.2.5. Develop guidance on incentives and how to effectively utilize supplemental funding. Page 42. ○ Action 3.1.2.6. Dissemination of recruiting and incentive guidance. Page 42. <p>Milestone 3.1.3. The BIE has reviewed, developed and/or revised guidance on how to effectively utilize federal funds to hire highly effective principals, teachers and staff and provided support to implement guidance. Page 42.</p> <p>Milestone 3.1.4. The BIE has developed guidance on how to retain highly effective principals, teachers and staff. Page 42.</p>
<p>Strategy 3.2 If the BIE institutes systems of professional learning and mentoring for principals, teachers, and staff <u>then</u> principals, teachers and</p>	<p>1. “Consistent, research-based high-quality professional development is the key for increasing student achievement and retaining</p>	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p>

Strategic Direction Element	Suggestions	Final Version
<p>staff will have the knowledge and skills necessary to provide highly effective, culturally-relevant instruction, services and supports, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<p>high-quality staff...individuals who are credentialed and specialized in the different fields...would be needed.” [Tribal Leader].</p> <p>2. “With regard to the development of principals, teachers and staff, I could appreciate the conversation from education of teachers’ side, but I come from the residential side...I’m just curious what the discussion has been in terms of developing and mentoring staff when it comes to dorm residential staff...dorm staff is with these kids after hours. At 3:00 o’clock they go there and they’re with us until 8:00 o’clock the next morning and when things.” [Tribally Controlled Staff].</p> <p>3. “I want to make sure that we state here today that we have prepared. One is to ensure that quality, culturally appropriate personnel is in place at the local school levels supporting our students attending the BIE schools...it’s just not important that they be tribal members, but tribal members that are sensitive to the priorities of the tribe.” [Tribal Leader].</p> <p>4. “...employment of highly effective staff with culturally-relevant instruction...” [BIE Operated Employee].</p> <p>5. “There also needs to be a plan to provide ongoing professional development on culturally relevant instruction to non-native educators and staff to aid teacher and staff retention.” [Education Organization x2].</p> <p>6. “Teacher mentor programs would help, travel to other schools and states to learn/grow other programs...” [BIE Operated Employee].</p>	<p>Milestone 3.2.1. The BIE has researched professional development framework which leads to continuous learning opportunities and/or credentialing for individual principals, teachers and paraprofessionals. <u>Page 42.</u></p> <p>Milestone 3.2.2. The BIE has partnered with local Tribes, Tribal Education Departments, and Tribal colleges to establish an ongoing professional development program regarding local cultural competency for the Tribes served by respective BIE employees. <u>Page 42.</u></p> <p>Milestone 3.2.3. The BIE has developed and implemented a standardized induction framework for (1) principals, (2) teachers, and (3) paraprofessionals. <u>Page 43.</u></p> <p>Milestone 3.2.4. The BIE has implemented an ongoing principals, teachers and staff mentorship program. <u>Page 43.</u></p>

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	<p>7. "...more should be said about how to develop career pathways for current employees to gain licensure in their areas...engage in professional learning or mentorship." [Education Organization].</p> <p>8. "The strategies to support this mission area goal are consistent with the components necessary to develop and strengthen staffing, and to support successful teaching and learning conditions. We especially commend the inclusion of mentorship among veteran and new principals, teachers and staff. This signals a good beginning to foster and pass on valuable knowledge and skills." [Educational Organization].</p>	
<p>Strategy 3.3 If the BIE provides guidance and supports to schools on utilizing standards-aligned curricula to develop rigorous instruction, <u>then</u> principals, teachers and staff will implement standards-based instruction, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<p>1. "The focus of the explanation seems to be college and career readiness...[t]his should include providing... initiatives, programs...[including] vocational and trade programs, ROTC, bilingual programs, etc." [BIE Employee].</p> <p>2. "...our school needs to create a career exploration curriculum so our students can develop short-term and long-term goals" [BIE Employee].</p>	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 3.3.2. The BIE has conducted an inventory of aligned CTE programs in Bureau Operated and Tribally controlled schools. Page 43.</p> <p>Milestone 4.2.1. BIE has developed a high-quality career and technical education initiative, that begins in middle school and extends into high school, and schoolwide Individual Career Activity Plan (ICAP) models. <u>Page 47.</u></p> <ul style="list-style-type: none"> ○ Action 4.2.1.3. Assess students' career and academic interests, collect student data on their interests and aspirations, and follow through with guidance counseling. Page 47. ○ Action 4.2.1.5. Link/connect students with programs and expanded learning opportunities (e.g., DECA partnership,

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		<p>NAU Talent Search, ROTC, vocational education, STEM, credit recovery, summer work studies, local BIE and BIA internships, DOI internships) based upon their individual career plans. Page 47.</p>
<p>Strategy 3.4 If the BIE provides guidance and supports to schools on utilizing curriculum-aligned instruction, <u>then</u> principals, teachers and staff will implement rigorous, relevant instruction <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<p>1. "...the plan does not specify how model lessons and resources will be selected...curriculum should fit the needs of each local context and local educators and staff should have a central role in developing or selecting curriculum used...and curriculum for BIE and all other schools must include native history and culture that is produced by legitimate, knowledgeable sources." [Education Organization].</p>	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 3.3.1. The BIE has identified an evaluation process to identify school utilization of standards aligned curricula. Page 43.</p> <ul style="list-style-type: none"> ○ Action 3.3.1.2. Conduct evaluation of current school utilization of standards aligned curricula as well as Native-centric curricula. Page 43. <p>Milestone 3.4.1. The BIE has developed standardized guidance to incorporate culturally responsive curriculum aligned instruction. Page 44.</p> <ul style="list-style-type: none"> ○ Action 3.4.1.2. Research and review of existing Native-centric curricula and models. Page 44. ○ Action 3.4.1.6. Develop a directory of Native-centric resources for schools to utilize. Page 44. <p>Milestone 3.4.2. The BIE has developed standardized support process in utilizing a curriculum aligned instruction. Page 44.</p>
<p>Strategy 3.5 If the BIE provides guidance and supports to schools on utilizing assessments during instruction and at the end of instructional units, courses, or grades, <u>then</u> principals, teachers and</p>	<p>1. "Although curriculum, written goals, standards and assessments are well written, it is the practice and delivery of instruction that makes the huge difference in students' academic</p>	<p>Input related to career exploration, is included in the following milestones and actions:</p>

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<p>staff will use data to adjust instruction and provide interventions to better meet the needs of individual students, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<p>success. Teachers and all involved personnel should be accountable for student success and learning. I feel a variety of assessments could be used to provide a variety of opportunities for students to show their progress and success not just one high stakes assessment (NWEA). Tracking students year after year would give us a lot of information on students interests style of earning, interventions, and type of instruction that is given.” [Unidentified].</p>	<p>Milestone 3.5.1. The BIE has inventoried and researched current field practices and best practices in relation to instructional formative and summative assessment utilization. Page 44.</p> <p>Milestone 3.5.2. The BIE has strengthened data literacy knowledge in the field (leadership, teacher and student /parent levels) in relation to curriculum standards-based assessments. Page 44.</p>
<p>Strategy 3.6 <i>Strategy Explanation</i></p> <p><i>Personal competencies are related sets of skills and knowledge that are fundamental to education and employment success. Personal competencies include prior knowledge, persistence in learning, the ability to set personal goals, make responsible decisions, and a sense of self-worth and respect for others...</i></p>	<ol style="list-style-type: none"> 1. “There ought to be a longer list of indicators of social and emotional learning, and college and career skills such as being able to work independently and collaboratively with others, empathy, self-awareness, digital literacy, tolerance of others and culturally sensitive views and attitudes, adaptability, etc.” [Education Organization]. 2. “Adequate transportation to and from school and program sites. Without adequate transportation, schools and programs experience high rates of absenteeism, leading to failed classes, and eventually non-completion.” [Education Organization]. 	<p><i>Strategy Explanation</i> <i>Personal competencies are related sets of skills and knowledge that are fundamental to education and employment success. Personal competencies include, but are not limited to, prior knowledge, persistence in learning, the ability to set personal goals, make responsible decisions, and a sense of self-worth and respect for others. Page 24.</i></p> <p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 3.6.1. The BIE has researched and conducted a study related to absenteeism prevention initiatives. Page 45.</p> <ul style="list-style-type: none"> ○ Action 3.6.1.1. Research current absenteeism prevention initiatives applicable to BIE. Page 45. ○ Action 3.6.1.2. Research current methods of capturing absentee data in BIE schools to include all applicable attendance categories (road conditions, safety, mobility and obstacles to attendance). Page 45. ○ Action 3.6.1.3. Request enhancement from student information system to include

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		<p>attendance categories regarding road conditions, mobility and reporting option detailing obstacles to attendance. Page 45.</p> <ul style="list-style-type: none"> ○ Action 3.6.1.5. Disseminate the study and findings. Page 45.
<p>Strategy 3.7 If the BIE partners with and supports tribes in their efforts to revitalize and maintain cultures and languages through curricula and instruction, <u>then</u> schools will support tribal efforts to teach and maintain cultures and languages, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<ol style="list-style-type: none"> 1. “Talking about language programs also, it’s important for every tribe, especially today, because every tribe is at a certain point where they are losing their languages. So it’s becoming a priority... every BIE school can have something to look at and even fund it. And it’s good for the self-determination...we need to make sure that when there is a consultation, we include all these things in there...language is important... whoever is doing all of these proposals and planning, we need to kind of be flexible when anybody tries to comment. [Tribal Leader]. 2. “...tribes that are unique, they each have their own cultural language...BIE would be willing to cater specifically for the language program.” [Tribal Leader]. 3. “...about the language portion is that, what is the goal of implementing native language and culture? Is it 30 minutes a day? If you are trying to build that into a curriculum, there is no way that a student is going to learn to speak their native tongue with just 30 minutes a day. If you look at other countries, they have their primary language spoken when teachers are teaching or instructing.” [School Board Representative]. 4. “...customize some things in here for language and culture. And again, we are not on an interpretive mode for language and culture. We 	<p>Original Strategy 3.7 was moved to Goal 5, Strategy 5.1.</p>

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	<p>don't need interpretation from teachers to help kids understand English. That's no longer the case. We are on the preservation and survival mode for our language and culture, and how they interface with the tribal education departments is very, very important in that. In fact, you might want them to lead on that part. [School Board Representative].</p> <p>5. "...in terms of language...we are looking at a plan also, particularly because I think you can't separate language out from that...So that needs to be a thread that's going through everything...we need to build flexibility in creating a plan...We have a BIE operated school, and that is a school on our reservation, also a charter school and a public school. The BIE school has the most...certified teachers and Tas, but yet their focus on English language literacy and proficiency by the third grade is defeating our language immersion efforts at the early childhood level, and it's frustrating because it's a tribal priority, but yet, the message coming to our parents from our own educators, from our own community is that our Head Start isn't preparing our kids well enough for kindergarten. And that's the reality, because we are not focusing on English language literacy. Our focus is strengthening the language...how do we create a win-win where we are all coming to the table to support the priority" [Tribal Leader].</p> <p>6. "...the language part, that is so critical to us and that is so important to us, because what we are finding out is, kids that have language and cultural do better in life than those that don't have it. So it's the grounding. It's the grounding</p>	

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	<p>of who these kids are going to be in the future..." [Tribal Leader].</p> <p>7. "The whole issue on language...our priority is to relearn and maintain our language, because our language is our culture and who we are as a people...One of the programs that we wanted to look at was to have a 100 percent...language immersion program for students from two to three years old up to four or five...I'm not sure about the other tribes, but certainly [my] Tribe is interested in." [Tribal Leader].</p> <p>8. "In regard to language revitalization and a culturally appropriate curriculum...The plan needs to be able to allow the [Tribes] to meet the shifting needs and cultural values of the students served and the ability to foster a school system...grounded in...language[,] culture and language history development." [Tribal Leader].</p> <p>9. "To revitalize and maintain cultures, we need to hold parents responsible for learning their language and culture too. It is hard to teach culture and teach the English language in all content areas within a school day." [BIE Employee].</p> <p>10. "Native languages and culture. I strongly feel that the students, starting for birth learning the native language rest and the responsibility of the family and tribe need to come up with a program through the community to keep the language alive. We only have 6 hours per day to get our student ready for the real world where English is the language that will help them survive." [BIE Employee].</p>	

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	<p>11. "Native language and cultures be provided by the BIE tribe at the chapter house." [Unidentified].</p> <p>12. "Native language and culture, create an immersion program that will introduce cultural identify for each respective tribe. [BIE Employee].</p> <p>13. "...there should be mention of dual language programs or full-fledged bilingual education as the most ideal vehicles for second language acquisition....We also recommend including language about sharing materials on culturally relevant language instruction with educators and staff serving native students in non-BIE schools. There should also be a mention of partnering with tribal organizations and tribal members who may not be part of BIE network to further enhance the development of such materials and resources." [Education Organization].</p> <p>14. "Highlighting the importance of native languages and culture for academic success is another area that strengthens this plan and shows an understanding of the need for students and the educators and staff who work with them to be culturally competent and to take pride in native cultural and linguistic heritage." [Education Organization].</p> <p>15. "Prioritize the revitalization and integration of Native languages....: a. Adopting a collective effort to ...communally develop curricula and instruction standards via the TED/TEA. B. Supporting...tribal communities...efforts related to immersing skills...c. Developing the dissemination and access of native languages using technology." [Education Organization].</p>	

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	<p>16. "We would also suggest including a component that mirrors the later section about language revitalization and the effectiveness of second language acquisition, which ties into the goal of tribal sovereignty. [Education Organizations]."</p>	
<p>NEW FAMILY-SCHOOL-COMMUNITY ENGAGEMENT STRATEGY (MOVED FROM GOAL 1 and numbered as STRATEGY 3.7)</p>	<ol style="list-style-type: none"> 1. "[The role of family engagement] is completely overlooked in this K-12 mission area. It should not be assumed that strong family involvement will happen in the later grades without specific efforts and resources dedicated to that effort." [Education Organization]. 2. "Research shows that an increase in community and family engagement leads to higher student involvement, grades and graduation rates. It is a smart idea to engage the family and community early and that engagement needs to be maintained for the rest of every student's time in school." [Education Organization]. 3. "Effectively supporting Native students attending BIE funded school will require a concentrated effort from multiple partners...recommend[] that BIE's Strategic Plan include language around providing direct support and assistance to BIE funded schools as a way to increase academic achievement for BIE students." [Education Organization]. 4. "Strategy 1.1 the BIE is right to stress family engagement and link family and community engagement to cultural competency. [Education Organization]. 	<p>When the BIE provides services and supports to strengthen family-school-community connections from pre-k through postsecondary education, then there will be more opportunities for parents, primary caregivers, and communities to engage in their child's learning as their first and most influential teacher, and all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school and be prepared for post-secondary study and/or career opportunities. Page 25.</p> <p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 3.7.1. The BIE has implemented effective family-school-community connection model to assist students in achieving academic and career goals. Page 45.</p> <p>Milestone 3.7.2. The BIE has implemented a responsive system of school improvement. Page 46.</p>

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	<p>5. "Throughout Indian Country we need to focus on Parent Programs (sic) that will support the foundational training the students get from their first teachers, their parents." [Unknown].</p>	
<p>NEW SCHOOL IMPROVEMENT STRATEGY NUMBERED AS STRATEGY 3.8</p>	<p>1. "The strategic plan is attempting to cover many items but ultimately, it doesn't address two simple issues Graduation Rates and Dropout Rates. A strategic plan should be simple and aligned to resolve this glaringly bad issue. As the National Indian Education Statistics (NIES) reports, BIE schools continue to lag behind public schools." [Tribal Leader] AND [School Board].</p> <p>2. "When we are talking about tribally controlled schools...there is a notion or there is sort of the idea from the tribal side...that when a situation occurs within a tribally controlled school, when a school starts to struggle in carrying out its mission, even though they said they will take over the responsibility...the BIE sometimes does not assist or they drag their feet before they even start to assist. How is this strategic plan going to help tribally controlled schools in that type of situation, with the idea that my people are saying that the BIE will not really assist in a tribally controlled school? Will that be addressed in this strategic plan?" [Tribal Leader].</p>	<p><u>When</u> the BIE implements a responsive system of school technical assistance and support <u>then</u> schools will effectively implement school improvement plans and increase the quality of instruction, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school and be prepared for post-secondary study and/or career opportunities. <u>Page 25.</u></p> <p>Milestone 3.8.1. The BIE has identified the components and processes of a responsive system of school improvement. <u>Page 46.</u></p> <ul style="list-style-type: none"> ○ Action 3.8.1.1. Evaluate current systems, tools and processes for school improvement. <u>Page 46.</u> ○ Action 3.8.1.2. Examine effective methods for school structuring (scheduling, calendaring, staffing). <u>Page 46.</u> ○ Action 3.8.1.3. Identify best practices of school improvement system. <u>Page 46.</u> ○ Action 3.8.1.4. Identify essential components of educational service delivery (including non-academic and co-curricular

Strategic Direction Element	Suggestions	Final Version
	<p>3. "...why couldn't all of those schools have followed the school that succeeded? What happened there? Why can't we find out why the success was there? Why can't we go to those schools, those successful schools, those people, those educators, those teachers, those principals, those areas, why couldn't we go to them and say, why did we succeed? What happened? And what's happening now in these schools that are not?" [Unidentified].</p>	<p>goals, i.e. behavior/mental health). <u>Page 46.</u></p> <ul style="list-style-type: none"> ○ Action 3.8.1.5. Align school-district-state-national priorities and outcomes. <u>Page 46.</u> <p>Milestone 3.7.2. The BIE has implemented a responsive system of school improvement. <u>Page 46.</u></p>
<p>Goal 4: All students will graduate high school ready to succeed in postsecondary study and careers.</p>	<p>1. "Although the document speaks to the need to ensure that students are college and career ready, it does not speak to the need to provide course work and programming that would provide pathways for students into the global economy." [Tribal Leader].</p>	<p>1. All students will graduate high school ready to think globally and succeed in postsecondary study and careers. <u>Page 26.</u></p>
<p>Strategy 4.1 <u>If the BIE, in collaboration with colleges and universities, aligns and supports high school graduation and post-secondary entry requirements and provides transition supports to students, <u>then</u> schools will implement a seamless system of support that bridges K-12 and post-secondary career planning and student self-advocacy, and all students will graduate from high school and succeed in post-secondary study and careers.</u></p>	<p>1. "What kind of coursework would be offered at the K-12 level or the postsecondary levels, how data and research will be used to drive decisions, and how students will be supported and tracked after they begin a career or higher education studies, and how community partners will be identified and engaged." [Education Organization x2].</p> <p>2. "The BIE also needs to consider using transition counselors...for all students in CTE programs so students who enroll either in community college programs, four-year institutions, or apprenticeship programs by various labor unions and/or employers can have even more purposeful support after they exit." [Education Organization x2].</p>	<p><u>BIE has included the following milestones and action to reflect these consultation comments:</u></p> <p>Milestone 4.1.2. BIE has developed and disseminated a best practices toolkit to support transitional services. <u>Page 47.</u></p> <ul style="list-style-type: none"> ○ Action 4.1.2.2. Conduct a needs assessment of all BIE-funded schools which identifies the number of schools that have transition counselors and identifies barriers and proposes interventions to increase the number of such counselors. <u>Page 47.</u> ○ Action 4.1.2.3. Identify the dual credit/enrollment courses offered by SIPI and Haskell as well as the available delivery methods. <u>Page 47.</u>

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		<ul style="list-style-type: none"> ○ Action 4.1.4.1. BIE has developed a formal back reach program starting in the sixth grade. <u>Page 47.</u>
<p>Strategy 4.2 If the BIE provides professional learning, expanded student learning opportunities, and responsive supports and interventions, <u>then</u> K-12 schools will provide more expansive rigorous learning opportunities that foster high school graduation and prepare students to become leaders in their communities and tribal governments, <u>and</u> all students will graduate from high school ready to succeed in post-secondary study and careers.</p>	<ol style="list-style-type: none"> 1. "there is no mention of when career and technical education programs should begin. Successful CTE programs expose students to career exploration in the middle grades so that students can have some idea of career interests before entering high school." [Education Organization x2]. 2. "Individual Career Activity Plan...within five years every kid should have an – you know to realistically be able to success...ICAP preparation for teachers." [TC Superintendent]. 3. "So on careers, is that focused on trade schools? [Tribal Leader]. 4. "NAU Talent Search program; high school recruitment; AIS through UVU; Need other programs: Upward Bound, HS credit." [BIE Employee]. 5. "...our school needs an accountability system in place for school counselors; college readiness curriculum a collaboration between teachers and counselors; career shadowing opportunities, with college visits; partnerships with high education..." [BIE Employee]. 6. "We will get students ready to succeed in postsecondary and careers through hiring and training highly qualified staff in specific disciplinary areas and offer opportunities such as career and technical programs, DECA, 	<p><u>Input is included in the following milestones and actions:</u></p> <p>Milestone 4.2.1. BIE has developed a high-quality career and technical education initiative that begins in middle school and extends into high school, and schoolwide Individual Career Activity Plan (ICAP) models. <u>Page 47.</u></p> <ul style="list-style-type: none"> ○ Action 4.2.1.3. Assess students' career and academic interests, collect student data on their interests and aspirations, and follow through with guidance counseling. <u>Page 47.</u> ○ Action 4.2.1.5. Link/connect students with programs and expanded learning opportunities (e.g., DECA partnership, NAU Talent Search, ROTC, vocational education, STEM, credit recovery, summer work studies, local BIE and BIA internships, DOI internships) based upon their individual career plans. <u>Page 47.</u> ○ Action 4.2.1.6. Assist students achieving their identified academic and career goals as specified in ICAP and IEP. <u>Page 42.</u> <p>Milestone 4.2.4. BIE has piloted and refined a middle school career and technical education initiative that incorporates a school wide ICAP model. <u>Page 48.</u></p> <p>Milestone 4.4.4. Commission a study regarding access to vocational and trade. <u>Page 49.</u></p>

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	<p>ROTC, Vic Ed, environmental education, STEM, interscholastic athletics, credit recovery, advanced credit classes, dual enrollment with a college or university.</p> <p>Strategy 3.1 and 3.2 address recruiting and retaining highly effective teachers, leaders and staff, this includes those to teach career and technical education classes, advanced placement classes and other expanded learning opportunities." [BIE Employee].</p>	
<p>Strategy 4.3 If the BIE promotes student, family, and community engagement on education pathways based on student interests and aspirations, <u>then</u> schools will engage students, families, and communities in setting goals and tracking progress, <u>and</u> all students will graduate from high school and succeed in post-secondary study and careers.</p>	<ol style="list-style-type: none"> 1. "Helping the TED/TEA lead and design a culture of instilling a "being prepared for the future" mentality for all tribal citizens..." [Education Organization]. 2. "Another important element that is...analysis and information on engaging employers to give authenticity to student projects, to provide students with internships and to advise on curriculum development...organized labor as a partner in pursuing a CTE plan... For example, establishing a CTE pathway in BIE schools in collaboration with FISE and other unions could lead to a successful "grow-your-own approach" for developing students into highly qualified well-prepared employees ready to work in areas needed by various federal agencies such as teaching, accounting, finance, land management, land preservation, real estate, gaming, hospitality, business management and other positions where it has been difficult to find qualified native job candidates." [Education Organization] AND [Education Organization]. 	<p><u>Input is included in the following milestones and actions:</u></p> <p>Milestone 4.2.2. BIE has conducted a labor market analysis and identified skills needed to fill occupational gaps in Indian Country in partnership with TEDs and public/private employers. Page 48.</p> <p>Milestone 4.3.1. BIE has created a framework that schools can use to directly engage students, families and caregivers on education and career pathways. Page 48.</p>

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<p>Strategy 4.4 If the BIE leverages Haskell Indian Nations University and Southwestern Indian Polytechnic Institute as options for post-secondary education and partners with Tribal Colleges and Universities, <u>then</u> students, families, and communities will have multiple pathways for post-secondary education, <u>and</u> all students will graduate from high school ready to succeed in post-secondary study and careers</p>	<ol style="list-style-type: none"> 1. "Add Ft Lewis College for leverage due to its high Native American enrollment." [BIE Employee]. 2. "...the vision to partner with Haskell and SIPI and tribal colleges and universities is laudable, but this does not give the same range of opportunities to students that exposure to multiple higher education institutions and employers can offer." [Education Organization]. 	<p>Input is included in the following milestones and actions:</p> <p>Milestone 4.4.1. BIE has developed an expedited process for executing MOUs/MOAs and partnership agreements. Page 49.</p> <ul style="list-style-type: none"> o Action 4.4.1.1. Draft an MOU template for use with Native-serving, non-tribal and other interested public higher education institutions. Include, but do not limit to MOUs with TCUs regarding: <ol style="list-style-type: none"> a. secondary to postsecondary transition services that could be offered to BIE students. b. tracking and sharing FERPA/PII compliant student information. c. BIE student visit activities. d. dual enrollment with BIE schools. Page 49. <p>Milestone 4.4.2. BIE has provided fiscal resources to support a formalized outreach process between tribal colleges and BIE-funded schools. Page 49.</p>
<p>Goal 5 Goal Explanation:</p> <p><i>Tribal self-determination is a process where leaders and members of each tribe choose their future direction based on their individual needs influenced by their unique culture and identity. Self-determination is a critical part of student education because it builds the capacity of each tribe to address the educational needs of their students and builds future leaders and members to advocate for and sustain self-determining independence. Collaborative partnerships between the BIE and tribes creates the conditions and capacity needed to build culturally-relevant and rigorous</i></p>	<ol style="list-style-type: none"> 1. "...concerned with respect to the lack of reference strengthening tribal sovereignty in the Strategic Plan...Along with self-determination, the right to self-govern should be emphasized." [Tribal Leader]. 2. "Include language emphasizing self-governance, which includes a nation's right to freely determine social, economic, political and cultural future without external interference. Recommends that BIE provide a basic outline of that the agency proposes to do to strengthen 	<p>Goal Explanation</p> <p><i>Tribes exercise self-determination through a process of self-governance, which includes a nation's right to freely determine its social, economic, political and cultural future free of external influences. Self-determination is a critical part of student education because it builds the capacity of each tribe to address the educational needs of their students and builds future leaders and members to advocate for and sustain self-determining independence. Collaborative partnerships between the BIE and tribes creates the conditions and capacity</i></p>

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<p><i>learning experiences to support students in developing the knowledge, skills, and behaviors needed to lead their sovereign nations.</i></p>	<p>self-determination overall.” [Education Organization].</p>	<p><i>needed to build culturally-relevant and rigorous learning experiences to support students in developing the knowledge, skills, and behaviors needed to lead their sovereign nations. <u>Page 29.</u></i></p>
<p>Strategy 5.1 (Moved from Goal 3) <u>If</u> the BIE partners with and supports tribes in their efforts to revitalize and maintain cultures and languages through curricula and instruction, <u>then</u> schools will support tribal efforts to teach and maintain cultures and languages, <u>and</u> all students will develop the knowledge, skills, and behaviors necessary to progress successfully through school.</p>	<ol style="list-style-type: none"> 1. “Talking about language programs also, it’s important for every tribe, especially today, because every tribe is at a certain point where they are losing their languages. So it’s becoming a priority... every BIE school can have something to look at and even fund it. And it’s good for the self-determination...we need to make sure that when there is a consultation, we include all these things in there...language is important... whoever is doing all of these proposals and planning, we need to kind of be flexible when anybody tries to comment. [Tribal Leader]. 2. “...tribes that are unique, they each have their own cultural language...BIE would be willing to cater specifically for the language program.” [Tribal Leader]. 3. “...about the language portion is that, what is the goal of implementing native language and culture? Is it 30 minutes a day? If you are trying to build that into a curriculum, there is no way that a student is going to learn to speak their native tongue with just 30 minutes a day. If you look at other countries, they have their primary language spoken when teachers are teaching or instructing.” [School Board Representative]. 4. “...customize some things in here for language and culture. And again, we are not on an interpretive mode for language and culture. We don’t need interpretation from teachers to help 	<p>Strategy 5.1 <u>When</u> the BIE partners with and supports tribes in their efforts to revitalize and maintain cultures and languages, <u>then</u> schools will support tribal efforts to teach and maintain cultures and languages, <u>and</u> students will develop the knowledge, skills, and behaviors needed to lead their sovereign nations to a thriving future through self-determination. <u>Page 30.</u></p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 5.1.1. The BIE has completed a comprehensive analysis of all tribes served by BIE-funded schools regarding BIE support for language and culture. <u>Page 50.</u></p> <ul style="list-style-type: none"> ○ Action 5.1.1.1. Research existing data collection efforts regarding language and culture supports and needs. <u>Page 50.</u> ○ Action 5.1.1.2. Create an inventory of potential partners and resources that support language and culture. <u>Page 50.</u> ○ Action 5.1.1.3. Evaluate inventory and create a comprehensive analysis to publish recommendations for supporting language and culture at the local level. <u>Page 50.</u> <p>Milestone 5.1.2. The BIE has published protocols and delivered professional development for BIE to support engagement regarding language and culture at the local level. <u>Page 50.</u></p>

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	<p>kids understand English. That’s no longer the case. We are on the preservation and survival mode for our language and culture, and how they interface with the tribal education departments is very, very important in that. In fact, you might want them to lead on that part. [School Board Representative].</p> <p>5. “...in terms of language...we are looking at a plan also, particularly because I think you can’t separate language out from that...So that needs to be a thread that’s going through everything...we need to build flexibility in creating a plan...We have a BIE operated school, and that is a school on our reservation, also a charter school and a public school. The BIE school has the most...certified teachers and Tas, but yet their focus on English language literacy and proficiency by the third grade is defeating our language immersion efforts at the early childhood level, and it’s frustrating because it’s a tribal priority, but yet, the message coming to our parents from our own educators, from our own community is that our Head Start isn’t preparing our kids well enough for kindergarten. And that’s the reality, because we are not focusing on English language literacy. Our focus is strengthening the language...how do we create a win-win where we are all coming to the table to support the priority” [Tribal Leader].</p> <p>6. “...the language part, that is so critical to us and that is so important to us, because what we are finding out is, kids that have language and cultural do better in life than those that don’t have it. So it’s the grounding. It’s the grounding of who these kids are going to be in the future...” [Tribal Leader].</p>	

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	<p>7. “The whole issue on language...our priority is to relearn and maintain our language, because our language is our culture and who we are as a people...One of the programs that we wanted to look at was to have a 100 percent...language immersion program for students from two to three years old up to four or five...I’m not sure about the other tribes, but certainly [my] Tribe is interested in.” [Tribal Leader].</p> <p>8. “In regard to language revitalization and a culturally appropriate curriculum...The plan needs to be able to allow the [Tribes] to meet the shifting needs and cultural values of the students served and the ability to foster a school system...grounded in...language[,] culture and language history development. [Tribal Leader].</p> <p>9. “Our focus is strengthening the language. And so when we look at these things, we need to really rethink education and say, instead of creating conflicts within communities, within our own tribes and families, how do we create a win-win where we are all coming to the table to support the priority that's been identified by the tribe, and really beginning to look at language as an asset.” [Tribal Leader].</p> <p>10. “Talking about language programs also, it's important for every tribe, especially today, because every tribe is at a certain point where they are losing their languages.” [Tribal Leader].</p> <p>11. “...you just mentioned tribes that are unique, they each have their own cultural language, and you just said -- and you can correct me if I am</p>	

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	<p>wrong -- but it sounded like you said that BIE would be willing to cater specifically for the language program." [Tribal Leader].</p> <p>12. "To revitalize and maintain cultures, we need to hold parents responsible for learning their language and culture too. It is hard to teach culture and teach the English language in all content areas within a school day." [BIE Employee].</p> <p>13. "Native languages and culture. I strongly feel that the students, starting for birth learning the native language rest and the responsibility of the family and tribe need to come up with a program through the community to keep the language alive. We only have 6 hours per day to get our student ready for the real world where English is the language that will help them survive." [BIE Employee].</p> <p>14. "Native language and cultures be provided by the BIE tribe at the chapter house." [Unidentified].</p> <p>15. "Native language and culture, create an immersion program that will introduce cultural identify for each respective tribe. [BIE Employee].</p> <p>16. "...there should be mention of dual language programs or full-fledged bilingual education as the most ideal vehicles for second language acquisition.... We also recommend including language about sharing materials on culturally relevant language instruction with educators and staff serving native students in non-BIE schools. There should also be a mention of partnering</p>	

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	<p>with tribal organizations and tribal members who may not be part of BIE network to further enhance the development of such materials and resources.” [Education Organization].</p> <p>17. “Highlighting the importance of native languages and culture for academic success is another area that strengthens this plan and shows an understanding of the need for students and the educators and staff who work with them to be culturally competent and to take pride in native cultural and linguistic heritage.” [Education Organization].</p> <p>18. “Prioritize the revitalization and integration of Native languages...: a. Adopting a collective effort to ...communally develop curricula and instruction standards via the TED/TEA. B. Supporting...tribal communities...efforts related to immersing skills...c. Developing the dissemination and access of native languages using technology.” [Education Organization].</p> <p>19. “We would also suggest including a component that mirrors the later section about language revitalization and the effectiveness of second language acquisition, which ties into the goal of tribal sovereignty. [Education Organizations x2].</p> <p>20. Supporting how tribal communities make concerted efforts related to immersing skills and behaviors ensuring language revitalization. [Education Organization].</p>	
<p>Strategy 5.2 <u>If</u> the BIE, in partnership with tribes, identifies resources and supports needed to</p>	<p>1. “Recommends that BIE provide a basic outline of what the agency proposes to do to</p>	<p>Strategy 5.2 <u>When</u> the BIE, in partnership with tribes, identifies resources and supports needed to</p>

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<p>implement effective educational programs, <u>then</u> tribes will have resources and supports to oversee and implement successful educational programs which contribute to the future of their sovereign nations</p>	<p>strengthen self-determination overall.” [Education Organization].</p> <p>2. “Strategy 5.2 include additional language that references the Tribally Controlled Schools Act of 1988 (Public Law 100-297) and the Indian Self-Determination and Education Assistance Act of 1975 (Public Law 93-638), language on flexibility for tribes to explore options of what tribal school choice means to each community.” [Education Organization].</p> <p>3. “The BIE’s Strategic Plan makes no mention of Tribal Education Departments or Tribal Education Agencies. We have asked in our meetings that you help ensure TEAs/TEDs receive annual funding to increase tribal capacity. This is not included in this plan.” [Tribal Leader].</p> <p>4. “...when the BIE offered the SIE grant and TED grant to move the tribe forward so that they can build their capacity to basically operate their schools...[BIE] offered no assistance in this capacity...[w]e got some assistance from the BIA, but not from the BIE...we do not want to reinvent the wheel. We want to know what is working for the BIE, rather than what's not working by reinventing the wheel, and incorporate it into the process of moving forward for my tribe.” [Tribal Leader].</p> <p>5. “...the other aspects in terms of working towards self-determination is this SIG or the TED grants, Tribal Education Department grants. I think the bureau needs to continue assisting tribes in building capacity at the tribal level so that we have an office that can oversee schools...[so</p>	<p>implement effective educational programs, then tribes will have resources and supports to oversee and implement successful educational programs which contribute to the future of their sovereign nations. <u>Page 30.</u></p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 5.2.1. The BIE has established collaborative partnerships to identify resources and supports for increasing capacity for tribal education stakeholders. Page 50.</p> <ul style="list-style-type: none"> ○ Action 5.2.1.4. Establish working group, initiate meetings to identify technical assistance needs and inform established practices and protocols for technical assistance for capacity building. Page 50. <p>Milestone 5.2.2. The BIE has established and published standard guidance for providing support to tribes as they assume educational programs. Page 50.</p> <p>Milestone 5.2.3. The BIE has developed technical assistance training modules to increase internal capacity for engaging tribes and implemented trainings on a continuous basis. Page 50.</p> <p>Milestone 5.2.4. The BIE has identified priorities and developed pilots to share successes and best practices. Page 51.</p> <p>Milestone 5.2.5. The BIE has created, published and disseminated modules to support tribal capacity to assume functions of their local BIE schools. Page 51.</p>

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	<p>TEDs] can operate their own schools and administer like central districts. So, I mean, it's something that we would like BIE to think about." [Tribal Leader].</p> <p>6. "The final Strategic Plan should also discuss the importance of having tribes provide technical assistance and oversight to operate and administer their own tribally controlled schools by operating Technical Assistance Centers through 638 Contracts." [Tribal Leader].</p> <p>7. "Include specific language on the importance of self-determination and provide a general mechanism through which tribes can be utilized to strengthen our own sovereignty within our education systems. And as a gentleman earlier mentioned, with the BIE grant schools, there is more of that kind of authority that tribes have, but for those of us that have BIE operated schools, strengthening that mechanism of that tribal involvement at the school and at the local level is ensuring that is in place." [Tribal Leader].</p> <p>8. "Through these strategies, the BIE seeks to provide tribes with the resources and support necessary to implement their own educational programs for their students. In line with the goals of these strategies, the BIE should concentrate on emphasizing tribal self-determination." [Tribal Leader].</p> <p>9. "Formalizing departmental-agency frameworks for TED/TEAs to implement cross-program." [Education Organization].</p>	

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	<p>10. “Assist in the codification of TED/TEA authorities, by: Increasing the administrative knowledge base around the importance of adopting and enforcing tribal education ordinances.” [Education Organization].</p> <p>11. “Provide professional development for TED/TEA Student Data and management systems.” [Education Organization].</p> <p>12. “Navigating the Family Educational Rights and Privacy Act (FERPA) to strengthen data-sharing efforts and continued protection of information.” [Education Organization].</p> <p>13. The proposed strategic plan clearly describes the agency’s vision, however lacks explaining practical implementation strategies that comprehensively partner with Tribal Education Departments (TEDs) in the fulfillment of the Bureau’s ultimate strategic direction. [Education Organization].</p> <p>14. “Capacity is not just about money...[t]he BIE has to address the cultural marginalization, health concerns, socioeconomic anchors, and other varieties of disenfranchisement that these children face in order to lay a foundation that can double as a springboard to success.” [BIE Employee].</p> <p>15. “And then, just the last point in terms of your goal number five in terms of leadership development...we need to help elevate that...when we talk about the leadership component, I think we do need to address staff and supporting staff and administration in terms of that aspect of that -- in terms of the</p>	

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	<p>educational components because, again, those are tied very closely together.” [School Board Representative].</p> <p>16. “...the proposed Strategic Plan appears to fail in taking into account the geographic, organizational, and socioeconomic realities of tribally controlled schools. The BIE should not continue to perpetuate a one size fits all approach for both BIE operated and tribally controlled schools.” [Tribal Leader].</p>	
<p>Strategy 5.2 If the BIE implements an effective system of support aligned to the education needs of tribally controlled schools, <u>then</u> tribes will have the capacity to effectively oversee and support their BIE funded schools in providing high quality education to their students</p>	<p>1. “Why doesn't the BIE reach out to educators from tribes? You have some good people in this room that know Indian education that can help BIE train school boards that can help develop and implement educational programs for native students.” [Tribal Leader].</p> <p>2. “...we know that there's a ton of requirements in the ESSA on educating children. We have Native educators that know the responsibilities of school boards and what they should be doing to educate children. The BIE needs to partner with some tribes that have these educators that can help them train school boards, because school boards, a lot of them do not require qualifications to sit on the school board...If we are talking about a partnership, these are true partnerships that you can look at for BIE to begin developing with tribes and native educators.” [Tribal Leader].</p> <p>3. “...we have a lot of really knowledgeable educators that BIE can potentially contract with in lieu of hiring permanent staff.” [Tribal Leader].</p>	<p>Now numbered as 5.3 because 5.1 was moved from Goal 3. Input is included in the following milestones and actions:</p> <p>Milestone 5.3.1. The BIE has developed and piloted a system of support for assisting tribes in their oversight of tribally-controlled schools. <u>Page 51.</u></p> <ul style="list-style-type: none"> ○ Action 5.3.1.1. Establish outreach, strengthen relationships to inform research for developing system of support for tribally-controlled schools. <u>Page 51.</u> ○ Action 5.3.1.2. Identify existing BIE policies, practices and procedures as well as human capital capacity, such as specialized skills like special education, cultural and language supports, grants management, etc., for developing system of support for tribally-controlled schools. <u>Page 51.</u> ○ Action 5.3.1.3. Publish policies and procedures to comprise system of support. <u>Page 51.</u>

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	<p>4. "One of the things that I wanted to offer is some perspective from the community grant school level...we encourage the BIE Strategic Plan to emphasize the need to engage as partnering with community controlled tribal grant schools." [Tribal Leader].</p> <p>5. "...strengthening tribal sovereignty, self-determination, and self-governance needs to be the foundation of this plan. This plan also does not address how BIE plans to build a collaborative relationship that facilitates the effective transfer of...students moving between bureau funded schools to tribally controlled schools and public schools. Failure to develop effective collaboration could undermine the programs and the initiatives of these schools." [Tribal Leader].</p>	<ul style="list-style-type: none"> ○ Action 5.3.1.4. Create an effective and ongoing communication plan, such as requesting technical assistance, provided through the system of support to strengthen capacity. Page 51. ○ Action 5.3.1.5. Train pertinent BIE staff on system of support. Page 51. <p>Milestone 5.3.2. The BIE has piloted and implemented system of support for assisting tribes in their oversight of tribally-controlled schools. Page 52.</p>
<p>5.3 New Student Sovereignty Strategy</p>		
	<p>1. "The document speaks to self-determination. However, it is devoid of language that would ensure that students are provided education to support their understanding of the sovereign governmental status of tribes and the historic origins of that sovereignty." [Tribal Leader].</p> <p>2. "This strategic plan would be improved by giving students a voice in the process. As students become partners in their own education they will be developing skills Tribes need...[i]f we expect our Tribal students to be contributing members of our communities they need to see themselves</p>	<p><u>Based on consultation, there is now an additional strategy and associated milestones and actions to address the comments provided:</u></p> <p>Strategy 5.4. <u>When</u> the BIE, in partnership with Tribes, supports education needed to increase students' knowledge of Tribal sovereignty, <u>then</u> students will have supports needed to help them become contributing members of Tribal communities <u>and</u> all students will develop the knowledge, skills, and behaviors needed to lead their sovereign nations to a thriving future through self-determination. Page 31.</p>

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	<p>as being part of the development team. They need to have the experience and training of making decision(s) that apply to their community and make significant changes to their Tribe...[i]ncluding students makes them allies and decision makers in their education and prepares them for roles they will assume in the Tribe after finishing their education.” [Tribal Leader].</p> <p>3. “...self-determination is an important skill for students to develop yet it does not guarantee that it will build the capacity of each tribe to address educational needs this phrase should be removed as self-determination can benefit students in many ways.” [BIE Employee].</p> <p>4. “...Strategy 5.1 and 5.2 contextualize provision of support as an overture extended to the tribe at large as opposed to students. ...Any strategy...of self-determination should be authored in the express interest of positioning present and future generations of Indian children to avail themselves of maximum opportunities for individual self-determination...the focus should be on the student...I believe the wording on this particular goal should telescope more definitively on the student.” [BIE Employee].</p> <p>5. “What curricula will we offer to prepare our students for self-determination, such as history, sociology civics, political science, bilingual education leadership, ethics, etc. We should mention types of partnerships with the tribal government and BIE schools.” [BIE Employee].</p> <p>6. “Knowing background of culture and language to develop identity, self-respect, determination,</p>	<p>Strategy Explanation <i>Tribal self-determination is an important concept for students to understand. As students become partners in their own education they will develop skills necessary to become contributing members of their communities. Students need to see themselves as being part of the community and have the knowledge, experiences and training to make decisions that apply to themselves and their community.</i> Page 31.</p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 5.4.1. The BIE has developed and published a framework to support Tribes, as desired, or partner with local schools to incorporate their individual languages, cultures, histories and Tribal governance models and strengthen student self-advocacy. Page 51.</p> <ul style="list-style-type: none"> ○ Action 5.4.1.1. Identify key stakeholders for each tribe served by a school to support individual languages, cultures, histories and tribal governance models and strengthen student self-advocacy. Page 51. <p>Milestone 5.4.2. The BIE has utilized SIPI and Haskell higher education institutions to develop educator resources and competencies to increase school personnel who can incorporate tribal languages, cultures, histories and governance models and strengthen student self-advocacy. Page 52.</p> <p>Milestone 5.4.3. The BIE has engaged and provided workshops to tribes regarding tribal engagement in non-BIE schools that serve Native students. Page 52.</p>

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	<p>appreciation; increase opportunities for cultural identities in community; need for hands on experiences..." [BIE Employee].</p>	
<p>Strategy 6.1 If the BIE develops and implements an employee system of support that includes policies, best practices, and data, <u>then</u> all staff will have the capacity to proactively provide services to students, schools, and tribes, <u>and</u> all students will benefit from an education system that is effective, efficient, transparent, and accountable.</p>	<ol style="list-style-type: none"> 1. "...principals need a whole lot of training regarding what's in the CFR and the 62-BIEM in terms of how to implement a plan at the local level... one I think is very commendable is a staff development plan...[w]e see a whole lot of lack of knowledge on the use of procedures and laws that are in place right now in the BIE system and that they are not being used...because they have not been trained to be a principal at a BIE operated or BIE funded school." [School Board]. 2. "...employees need training that is up to date and outside the box, resources for burnout, rust out, compassion fatigue, stress management." [BIE Employee]. 3. "Lack of relevant and supportive orientation process..." [BIE Employee]. 4. "There is no mention of incorporating the input and advice of the experts in the field - the staff and educators...professional development, professional learning process, procedures and policies, all of which affect teaching and learning." [Education Organization]. 5. "We get answers half the time a couple weeks later. Especially right now, with the tribal transition for a lot of these governors, they may see no answers." [Tribal Leader]. 6. "To truly support employees, and to maximize workplace productivity and efficiency, work 	<p><u>Input is included in the following milestones and actions:</u></p> <p>Milestone 6.1.1. The BIE has established a uniform and consistent employee orientation program. Page 52.</p> <p>Milestone 6.1.2. The BIE, in collaboration with field staff, has established. by position, employee professional development and ongoing training program. Page 52.</p> <p>Milestone 6.1.3. The BIE has established an employee support initiative which, at a minimum, addresses: employee burnout, stress management. Page 53</p> <ul style="list-style-type: none"> o Action 6.1.3.1. Complete and implement an anti-harassment initiative. Page 53.

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	<p>environments must be free of harassment. The results of a recent BIA Work Environment Survey were shocking...reflects many of the complaints and issues that FISE fields from BIE employees...there exists a culture of fear and intimidation at most BIE worksites...BIE schools must proactively address cultures of harassment where they exist... [Education Organization].</p>	
<p>Strategy 6.2 If the BIE develops a comprehensive data management system, <u>then</u> accurate data will be used to improve education services and supports, <u>and</u> all students will benefit from an education system that is effective, efficient, transparent, and accountable</p>	<ol style="list-style-type: none"> 1. "It's the qualitative piece. There's a data piece to this, too, but we need trained data people, as well, not just data management." [TCU President]. 2. "I think that data management overall: We call it that, but it's really data entry to make sure that's accurate. And then, there's data analysis and report writing. And we need to have information that's consistent and available to all levels within our communities, within our schools. And that needs to go out and inform our tribal leaders." [TCU President]. 	<p><u>Input is included in the following milestones and actions:</u></p> <p>Milestone 6.2.3. The BIE has ensured that all BIE staff members duly understand the data system and its operations; Established a comprehensive, consistent and regular training program for BIE and school level employees; Provided school staff members with necessary supports and resources (including training) to work with the data system. Page 54.</p> <p>Milestone 6.2.4. The BIE has developed data collection and reporting methods that minimize data collection and reporting burdens; Established a data collection and reporting calendar to communicate precisely when data is to be collected and reported; Provided schools, parents, and community members with information about the data system; Established regular communications to support data system implementation and maintenance. Page 54.</p> <p>Milestone 6.2.5. The BIE has determined how data is collected and stored to guide data system development and use; Established BIE's principles for data cataloging and storage. Page 55.</p>

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<p>Strategy 6.3 <u>If</u> the BIE establishes clear, consistent communication processes that model and facilitate two-way communication, <u>then</u> all stakeholders will have up-to-date reliable information and an avenue for timely input to assist BIE in providing effective leadership and supports to improve education, <u>and</u> all students will benefit from an education system that is effective, efficient, transparent, and accountable.</p>	<ol style="list-style-type: none"> 1. "Strategy 6.3 we would suggest changing the term "two-way" communication to "multilateral, reciprocal communication among all stakeholders involved". [Education Organization]. 2. "To improve communication between local education agencies and BIE...we suggest recommend an EPA or ADD attend agency school board meeting when invited. Update members on current information." [School Board Representative]. 	<p>Strategy 6.3 <u>When</u> the BIE establishes clear, consistent communication processes that model and facilitate multilateral, reciprocal communication, <u>then</u> all stakeholders will have up-to-date reliable information and an avenue for timely input to assist BIE in providing effective leadership and supports to improve education, <u>and</u> all students will benefit from an education system that is effective, efficient, transparent, and accountable. <u>Page 34.</u></p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 6.3.1. The BIE has established a comprehensive communications plan, including internal, external, and emergency communications sections. <u>Page 58.</u></p> <p>Milestone 6.3.3. The BIE has created and implemented an ERC School Board engagement schedule. <u>Page 58.</u></p>
<p>6.4 New Accountability Strategy</p>	<ol style="list-style-type: none"> 1. "Furthermore, the BIE has identified a set of core values that will apply to all their employees. How will these be enforced and what will be the consequences of failure to adhere to these values?" [Tribal Leader]. 	<p><u>Based on consultation, there is now an additional strategy, and associated milestones and actions to address the comments provided:</u></p> <p>Strategy 6.4. <u>When</u> the BIE develops and implements a comprehensive system for a BIE</p>

Strategic Direction Element	Suggestions	Final Version
	<p>2. "With regard to employees, we have a thing...that's called the dancing lemons. These principals, they go around and around... and they do things here, get a SCAN report, nobody can touch them, and they go to the next school. They have a contract signed with that school board for a BIE school, and they breach it, and they go to another BIE school, and they move. They keep moving. That's a problem we have had.</p> <p>And before I forget...a code of conduct for [BIE] employees. They ought to be held to the highest standard of integrity and ethics when it comes to working with our local folks...the code of conduct is important in how they relate to the 25 CFR and the 62 BIEM. I am very concerned about these employees' conduct." [School Board].</p> <p>3. "BIE funds some professional development, however school leaders should be held accountable for allotting and maximizing those funds." [Tribal Leader].</p> <p>4. "...there is an absence of language that speaks to effective personnel management to ensure that a highly motivated, competent, and capable workforce is developed and maintained by the BIE. This would include substantive BIAM-62, timely and accurate performance evaluations, and the removal or demotion of individuals that cannot perform their duties efficiently and effectively." [Tribal Leader].</p> <p>5. "Also, the Strategic Plan does not address BIE's internal lack of accountability for non-compliant and non-cooperative ADDs...[w]e need clarity on which department (Associate</p>	<p>accountability plan that includes policies, best practices, and data, then BIE will be equipped to ensure that its responsibilities are being fulfilled effectively and efficiently, and all students will benefit from an education system that is effective, efficient, transparent, and accountable. <u>Page 34.</u></p> <p><i>Strategy Explanation</i> When a school, district or overall education system has a strong culture of continuous improvement with accountability processes, measures and supports, improvement of the staff, students, and the organization itself is supported and embraced as an everyday routine. A comprehensive system includes aligned policies, effective practices, routine examination of data, and focused action with supports that integrates improvement efforts from external and internal stakeholders. This can result in rapid school improvement which results in improved student outcomes. <u>Page 34.</u></p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 6.4.1. The BIE has developed and implemented a strategic system (processes and tools) which that tracks the milestones and actions of the strategic performance plan. <u>Page 59.</u></p> <p>Milestone 6.4.2. The BIE has created and is implementing the financial and program oversight policy. <u>Page 59.</u></p> <p>Milestone 6.4.3. The BIE has established quality and aligned performance appraisals for all BIE employees on a timely basis. <u>Page 60.</u></p>

Strategic Direction Element	Suggestions	Final Version
	<p>Deputy Directors...Division of Performance and Accountability, School Operations, and the Bureau of Indian Affairs, and of course, the BIE Director) will be held accountable for these strategic goals." [Tribal Leader].</p> <p>6. "...in order for the Strategic Plan to stay on track and come to fruition, there needs to be an accountability system in place...recommends that the BIE utilize an enforcement mechanism to monitor the finalized Strategic Plan." [Education Organization].</p> <p>7. "Integrity-Although this seems like a great statement, the BIE has been accused of unprofessionalism and a lack of high standards of character for years. And the accusations have not always been unfounded. This may be rewritten to reflect that this is what we are striving for." [BIE Employee].</p> <p>8. Where is the accountability on the partnerships of families to meet the school and staff? [Unidentified].</p> <p>9. "Process for accountability if not overseen effectively." [BIE Employee].</p> <p>10. "Accountability (this needs its own section)." [BIE Employee].</p>	<p>Milestone 6.4.4. The BIE has maintained the strategic performance management system to adjust the strategic plan and address implementation issues in a timely manner. Page 60.</p> <p>Milestone 6.4.4. The BIE has maintained the strategic performance management system to adjust the strategic plan and address implementation issues in a timely manner. Page 60.</p> <p>Milestone 6.4.5. The BIE has maintained its financial oversight of all programs as required. Page 60..</p> <p>Milestone 6.4.6. The BIE continues to complete performance appraisals and provide resources for improvement to maintain an effective workforce. Page 60.</p>
6.5 New Facilities Strategy	<p>1. "Thirty-one BIE funded school are listed in poor condition. Our students have no choice but to learn in dilapidated school buildings. The strategic plan does not reference how BIE plans to ensure safe and effective school operation</p>	<p>Based on consultation, there is now an additional <u>strategy, and associated milestones and actions to address the comments provided:</u></p> <p>Strategy 6.5. When the BIE, in partnership with its Indian Affairs partners, supports effective facilities</p>

Strategic Direction Element	Suggestions	Final Version
	<p>and where those funds will come from.” [Tribal Leader].</p> <p>2. “Crucial to...ensure that BIE and tribally controlled schools have well-maintained, up-to-date facilities. For these reasons, the Tribe believes that the final Strategic Plan should emphasize the importance of maintaining, repairing, and rebuilding BIE and tribally controlled schools to maximize student well-being and academic performance. [Tribal Leader].</p> <p>3. “The BIE strategic Plan should also contain the long-range comprehensive school construction and maintenance called for by Congress....The so-called plan does not address the long range. Comprehensive school facilities construction and maintenance plan that the Congress has repeatedly requested.” [Tribal Leader].</p> <p>4. “Unfortunately, because many BIE schools are older, they are ill equipped to offer the classes. A strategic plan should be developed by BIE for the modernization of their schools.” [Tribal Leader].</p> <p>5. “Facilities management is not included in the document entitled strategic direction. I understand the BIA, not the BIE, has oversight in running and controlling BIE schools and program facilities. However, this is a vital part of providing a culturally relevant high quality education. Everything you're talking about here, you have to have adequate facilities to house these programs.” [Tribal Leader].</p> <p>6. “Broadband services, somebody mentioned that. We still see that \$64 million is missing from</p>	<p>management, <u>then</u> schools will provide students with a quality and safe learning environment, <u>and</u> all students will benefit from an education system that is effective, efficient, transparent and accountable. <u>Page 34.</u></p> <p>Strategy Explanation <i>The learning environment has a significant impact on student learning and staff recruitment and retention. It is crucial that every school is a safe, nurturing positive environment that provides rich learning experiences for all students. This strategy emphasizes the importance of maintaining, repairing, and rebuilding BIE and tribally controlled schools through strong inter- and intra-agency coordination, collaboration and communication.</i> <u>Page 34.</u></p> <p><u>Input is also included in the following milestones and actions:</u></p> <p>Milestone 6.5.1. The BIE has created a facilities work group which developed a service level agreement between BIA and BIE. <u>Page 60.</u></p> <ul style="list-style-type: none"> ○ Action 6.5.1.1. Identify and assign technical experts within BIE, BIA, DFMC, and IA needed to conduct gap analysis. <u>Page 60.</u> ○ Action 6.5.1.2. Identify and assign roles and responsibilities to be shared within each agency. <u>Page 60.</u> ○ Action 6.5.1.3. Conduct a gap analysis between school ratings and school safety inspections. <u>Page 61.</u> ○ Action 6.5.1.4. Workgroup reviews findings and presents analysis and proposed Service Level Agreement to BIE, BIA, DFMC, and IA leadership for review approval. <u>Page 61.</u>

Strategic Direction Element	Suggestions	Final Version
	<p>the infrastructure in classrooms where there are all these computers, but very few kids can be on it at the same time for testing.” [Tribal Leader].</p> <p>7. “The document does not speak to the need to bring BIE information technology into the 21st century. Schools are still faced with tremendous challenges and connectivity to broadband services and connectivity with the world beyond their locations. There is yet to be developed a viable plan that would establish process and actions to provide connectivity, power supply, and replacement of equipment that has become outdated or been in use far beyond the equipment's life expectancy.” [Tribal Leader].</p> <p>8. “Facilities Management is not included in the document titled “Strategic Direction.” I understand the BIA, not BIE, has oversight and financial control of the BIE school and program facilities; however this is a vital part of providing a culturally relevant, high quality education.” [Tribal Leader].</p> <p>9. “In regards to school facilities, they also remain a high priority.” [Tribal Leader].</p> <p>10. “Broadband services, somebody mentioned that. We still see that \$64 million is missing from the infrastructure in classrooms where there are all these computers, but very few kids can be on it at the same time for testing. [Tribal School Board Representative].</p> <p>11. “The document does not speak to the need to bring BIE information technology into the 21st century. Schools are still faced with tremendous challenges and connectivity to</p>	<p>Milestone 6.5.2. The BIE has established a consistent and regular inter-agency coordination and communications procedure between BIE personnel, BIA regional facility managers and DFMC (Division of Facilities Management Construction). Page 61.</p> <ul style="list-style-type: none"> ○ Action 6.5.2.1. Identify and assign facilities coordination and communications representatives from BIE, BIA, DFMC, and IA. Page 61. ○ Action 6.5.2.2. Review current coordination and communications models and best practices. Page 61. ○ Action 6.5.2.3. Produce a report identifying said coordination and communication models and best practices. Page 61. ○ Action 6.5.2.4. Draft and implement facilities coordination and communication protocol between BIE, BIA, DFMC, and IA. Page 61. ○ Action 6.5.2.5. Establish regularly scheduled bi-weekly coordination and communications meetings. Page 61. <p>Milestone 6.5.3. The BIE continues to address facilities needs, including internet connectivity, through service level agreements, inter-agency coordination and routine communications. Page 61.</p>

Strategic Direction Element	Suggestions	Final Version
	<p>broadband services and connectivity with the world beyond their locations.” [Tribal Leader].</p> <p>12. “Facilities management is not included in the document entitled strategic direction. I understand the BIA, not the BIE, has oversight in running and controlling BIE schools and program facilities. However, this is a vital part of providing a culturally relevant high quality education. Everything you're talking about here, you have to have adequate facilities to house these programs.” [Tribal Leader].</p> <p>13. “...schools are so isolated and rural and isolated that they can't have Internet, then that should be a high priority because the world can come to them through the Internet.” [Education Organization].</p> <p>14. “...in regard to the facilities work...our buildings have, kind of, outlived their time...we have to have up-to-date facilities in order to do that work. We have to have technology included within those buildings...we're a little confused sometimes because, what happens is that we're BIE, but we have to use BIA, the BIA process, for when we want to put some new windows in.” [TCU President].</p>	
<p>New Glossary Section for Proposed Terms</p>	<p>1. Clarify the Identification and Navigation of Learning Environment Barriers (Goal 1: Strategy 1.1) [Education Organization].</p> <p>2. “The plan proposes partnerships with early education development organizations, tribes, tribal colleges and universities. However this is too limiting. There is great potential benefit</p>	<p><u>Input is included as terms defined in the Glossary section:</u></p> <p>1. <u>Add “barriers” to the Glossary.</u></p> <p>“Barrier(s)” is defined as any factor that impedes students from accessing a culturally relevant, high-quality education.” Page 62.</p>

Strategic Direction Element	Suggestions	Final Version
	<p>from developing partnerships form non-profit organizations, tribally controlled, public and private k-12 schools, and public and private colleges and universities." [TC Superintendent].</p> <p>3. "The term wellness should be explained or defined more specifically." [Education Organization].</p> <p>4. "...the term "behavioral health" should be more specifically defined ...it should state that behavioral health includes indicators such as: Positive school climate, evaluated by students, staff and families; policies and practices for school discipline and behavior change that are implemented with equity; and adequate staffing of psychologists, counselors, social workers and nurses..." [Education Organization].</p> <p>5. "...those terms should be explained or defined more specifically. For example, physical health and safety includes indicators such as universal immunization for infectious diseases; adequate staffing of school nurses, nurse aides, special educators, and paraprofessionals; comprehensive building plans for environmental health. In addition, students need enrollment in health insurance, so they are covered for hospitals outside of the reservations. [Education Organization].</p> <p>6. Add "staff" to the Glossary. Many of the milestones relate to providing training and resources to superintendents, principals, teachers and staff. [BIE Employee].</p> <p>7. "...recognizing that career readiness and being aware and helping with those pathways -- you</p>	<p>2. <u>Add "early childhood development organizations" to the Glossary.</u></p> <p>"Early Childhood Development Organization" is defined as any tribal, federal, state, or private entity which provides pre-kindergarten educational services." Page 65.</p> <p>3. <u>Add "wellness" to the Glossary.</u></p> <p>"Wellness" is defined as a student's optimal quality of physical and mental health supported through physical activity, good nutrition, safe learning environments, and access to cultural resources. Page 75.</p> <p>4. <u>Add "Behavioral Health" to the Glossary.</u></p> <p>"Behavioral Health" is defined as the emotions, behaviors and biology relating to a student's mental well-being, ability to function in every-day life, and concept of self." Page 63.</p> <p>5. <u>Add "Physical Health and Safety" to the Glossary.</u></p> <p>"Physical health refers to physical activity, nutrition and diet, rest and sleep, and general ability to address minor ailments/injuries or seek emergency care as needed. Safety refers to having the skills and behaviors to keep yourself and others safe." Page 68.</p> <p>6. <u>Add "Staff" to the Glossary.</u></p>

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	<p>know, career pathways. And sometimes, it's not post-secondary. Sometimes, again, it might be technical college or trade schools. It might be a lot of different things. But yet, at the same time, identifying those." [School Board Representative].</p> <p>8. "Capacity building. What does this mean?" [BIE Employee].</p>	<p>"Staff" is defined as BIE and Tribally Controlled school and Ethics in Government Act of 1978 Title V employees <u>other than superintendents, principals and teachers.</u> <u>Page 71.</u></p> <p>7. <u>Add "Post-Secondary" to the Glossary</u></p> <p>"Formal classes and learning after high schools in a variety of public and private institutions and settings."</p> <p>Post-Secondary" is defined as any education beyond high school. <u>Page 69.</u></p> <p><u>Add "Career Ready" to the Glossary</u></p> <p>"Career Ready" is defined as the attainment of competencies that broadly prepare graduates for successful transition into the workplace." <u>Page 63.</u></p> <p>8. <u>Add "Capacity Building" to the Glossary</u></p> <p>"Capacity Building" is defined as the process of developing and strengthening the skills, instincts, abilities, processes and resources that Tribes, TEDs, schoolboards, schools, and staff need to provide students with a high quality, culturally relevant education." <u>Page 63.</u></p>
<p>New Introduction Section for Background Information, History, and Planning Processes</p>	<p>1. "...there needs to be truth in the history of the Indian relationship with the United States. Our relationship did not begin with the Indian Self-Determination Act or the Indian Reorganization Act." [Tribal Leader].</p>	<p><u>Input is included in the Introduction sections to provide context to the Strategic Direction. Pages i – vi.</u></p>

Strategic Direction Element	Suggestions	Final Version
	<p>2. "...the BIE should include a discussion on how the trust responsibility will guide and influence the BIE's actions, and how the BIE will ensure that it fulfills its fiduciary duties in the upcoming years." [Tribal Leader].</p> <p>3. "...an accurate history of what occurred to the tribes over the years...in regard to the treaties and the trust responsibilities, and why we have that. And I think that there's a lack of understanding... if we're going to be good leaders, we need to know what happened in regard to that in order to have an accurate history of what happened. [Tribal Leader].</p> <p>...the federal trust responsibility for BIE students. And perhaps that could become part of the document of why we -- why this education is being provided to them as part of the ceding of millions of acres to the federal government in regard to the provision of education for us." [TCU President].</p> <p>4. "Other social determinants that have an impact on health - such as access to clean water, the deleterious impacts of poverty, devaluation of culture and language, and generational trauma as a result of past boarding school practices - must also be acknowledged." [Education Organization].</p> <p>5. "While tribal sovereignty is essential for self-determination, the role of BIE should not be undermined. School governance, finance and administration are the responsibility of the BIE and underscore the stewardship established by the federal government to ensure that native</p>	

Strategic Direction Element	Suggestions	Final Version
	<p>students thrive by having guaranteed access to high-quality education, instruction and resources." [Education Organization].</p> <p>6. "It is through the US federal government's treaty obligations and trust responsibilities that the promise to provide quality, effective education programs to the Native American people should be fulfilled by the DOI/BIE...[w]hile tribal sovereignty is essential for self-determination, the role of the BIE should not be undermined. School governance, finance and administration are the responsibility of the BIE and underscore the stewardship established by the federal government to ensure Native students thrive by having guaranteed access to high-quality education, instruction and resources". [Education Organization].</p> <p>7. "...should also recognize the history of institutional racism and assimilation practices in the BIE system, Employees need to understand how these past practices impact the families of their current students." [Education Organization].</p>	

Consultation Response Summary

Comment	BIE Response
<p>"Being able to get your presentation a little bit faster timeframe so that people have more opportunity for comment because generally that's why they're coming." [Tribal Leader].</p>	<p>This was noted at the time the comment was submitted and subsequent consultation sessions incorporated this feedback.</p>
<p>"Process-you talked early on to have this done and implemented by spring of 2018, but there's some big ticket items that aren't implemented in initial planning between January and spring-expectation that things will change in the spring. Things are not going to change in the spring. I think your objectives are to start change." [Unknown].</p>	<p>We recognize that change will take time to fully achieve, which is why the Strategic Direction will be implemented over a five (5) year timeframe.</p>
<p>"...missing what your intent is once you get everything and how you are going to finalize the document." [Unknown].</p>	<p>The BIE amended the Draft Strategic Plan Proposal in light of its thorough review of all comments submitted during the consultation process. Beginning on July 1, 2018 the BIE will begin its implementation efforts through a five (5) year timeframe.</p>
<p>"...if there is follow through with regard to lower educational levels, preschool, kindergarten elementary...would really benefit a lot of students, we see a lot of students here with missing rungs on their ladder." [BIE Employee].</p>	<p>BIE agrees that expanding access to early childhood education opportunities would greatly benefit Indian students. Thank you for validating the importance of High-Quality, Early Childhood Education Mission Area of the Strategic Direction.</p>
<p>"if this is available for playback at a later time?" [Tribal Leader].</p>	<p>Documentation and recordings of the BIE consultation sessions are available online.</p>
<p>"What's in place currently in terms of a strategic plan? There was no formal plan. And if there is one, what are the goals and priorities in terms of how they got roped into this?" [School Board Representative].</p>	<p>No strategic plan is currently in place. Previously the BIE undertook preliminary planning efforts, but such planning activities never culminated in a finalized plan. This Strategic Direction will serve as a completed, formal strategic plan to be implemented for the BIE.</p>

<p>"Is this the first round all around? This is the first time this has gone out or is this the second draft?" [BIE Employee].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction.</p>
<p>"...what is the requirement of the schools going to be? Like, you said you were going to measure it, but what if I measure -- I am measuring something different for my behavioral health because the behavioral health of my students means something different up here in the north versus in the south? So how do you plan on having a system of measurement...how does that translate down to the schools...when it comes to behavioral health or student wellness, what are we using that measure that?" [Unknown].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management, including measurements related to behavioral health. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p>
<p>"How is the Bureau going to measure that? You know what I mean? It seems like it's being kind of -- no, he was going to...what's going to happen to the kids?" [Unknown].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p> <p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>

<p>"...the data management piece...[i]f the data's not there, we need to do a better job of it. But it's just getting a plan of what data you need and how do we submit it and what timeframes do we submit it so that we can get that part down to translate -- trickle that down to us." [Unknown].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management, including the creation of a regular data reporting procedure and calendar.</p>
<p>"Well, first thing starting off again is the GAO report from 2013. Again, I know it's a strategic plan, but item number one is high leadership turnover. And I think there's a direct variable or a connectivity between those two points. In order to accomplish a strong strategic plan, you have to have strong leadership all the way through the system. And so, to me, again, that's red flag number one. So that, to me, is something that I think I haven't seen specifically written within the plan. But yet, at the same time, I think it's important that there be further areas of leadership being addressed, and that that's totally separate. leadership needs to be addressed through a stronger leadership strategy." [School Board Representative].</p>	<p>BIE agrees that highly-effective leadership is needed in order to successfully implement the Strategic Direction. Mission Area 6, Performance Management, and its accompanying strategies, milestones and actions are designed to address this critical leadership need.</p>
<p>"...you stated that there hasn't been a plan in place prior and that this is...concern I would have, again, is: What are the next steps? ...this being a living process -- is how this will be updating as you progress forward...if you don't make plans for how to update this ahead of time, and then you get two or three years down the road, then all of a sudden, you know, you're in a predicament...I appreciate the consultation and the tweaking that's going to happen." [Unknown].</p>	<p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p> <p>As part of each yearly evaluation of milestones and actions, the BIE will provide reporting information for Tribes, school boards, employees and other stakeholders to inform their feedback and input for the mid-cycle status update during Year Three. This process is intended to ensure transparent and ongoing collaboration and coordination with Tribes, school boards, employees and other stakeholders as future year milestones and actions are identified and implemented pursuant to the Strategic Direction's goals and strategies.</p>

<p>"And then, going through your strategies -- your document's a little bit hard to read because you have your goals separated from your strategies. Where, if you had them right on the top of the page, it would be a lot easier to reference." [Unknown].</p>	<p>The final version of the Strategic Direction utilizes formatting that includes goals being listed alongside accompanying strategies.</p>
<p>"And I know that we're a connected system, but I think that we need to start having the conversation how different a K-6 or a K-8 program is from a 9-12 program in terms of the academic goals; in terms of the behavior goals; in terms of the skill goals that are going on." [BIE Employee].</p>	<p>Goals 1, 3 and 4 identify, delineate, and connect early childhood, K-12 and post-secondary education to ensure a coordinated pathway for students to achieve their goals.</p>
<p>"That the first round of this draft is good. I appreciate parts of it. I appreciate having a voice now in it." [BIE Employee].</p>	<p>BIE appreciates all comments received through the strategic planning process.</p>
<p>"...I would like to see a piece in your next steps where, if you're supplying us with a strategic plan and you have an overall mission and goal, that maybe you're providing some type of technical assistance to our schools and/or to our tribal nations or both of something that's an action plan-orientated...so that might be a suggestion for next steps. technical assistance to schools-system of support as a strategy or milestones-school improvement-could be goal 3 or goal 6." [BIE Employee].</p>	<p>Upon review of all input provided through the consultation process, the BIE added technical assistance strategies for both schools and Tribes through Strategies 3.8, 5.2 and 5.3.</p>
<p>"This is the first time we've ever heard of the opportunity to come to the table...as a BIE employee, can I draft comments, written comments, without fear of reprimand? Do I have to get it approved by my -- up the chain of command, or can I just submit?" [BIE Employee].</p>	<p>As was communicated during the consultation in response to this inquiry, all stakeholders, including BIE employees, had the opportunity to submit comments through January 13, 2018. BIE employees did not require supervisor approval to submit such comments.</p>
<p>"Ensure clarity and transparency in the rollout process. I think you guys are doing a good job of that: You being here, and you sharing that with the group...What are the outcome measures to show that we are actually having success for each thing that we've changed for these areas, these goals, these strategies...What are our measures, the evaluation component of these goals and these strategies, that are being put forth? How do we know? What's the timeline for that? How do we know if we're having success, or if we're failing on that, or have not completed it yet? Or, in</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p>

<p>our evaluation of this objective or this goal or this strategy, that more time is needed to further refine that process?" [TCU President].</p>	<p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>"...If we're going to provide a school, if we're going to provide education, we have to have up-to-date facilities in order to do that work. We have to have technology included within those buildings...we're a little confused sometimes because, what happens is that we're BIE, but we have to use BIA, the BIA process, for when we want to put some new windows in. And we know that BIE is separate from BIA, you know, so no one's really accountable to one another..." [TCU President].</p>	<p>Upon review of all input provided through the consultation process, the BIE added a facility specific strategy at 6.5, which includes specific milestones and actions designed to facilitate coordination with other federal entities. Additionally, through implementation of Strategy 6.3 the BIE will be equipped to better communicate and coordinate with its facility partners.</p>
<p>"That leaders-to-leaders is so important for us...but some of the time, our elected officials are not being knowledgeable in educational practices. So you want your educational leaders at the table in order to provide that comment and then take that information back to their elected officials." [TCU President].</p>	<p>BIE is committed to working with its Tribal partners on a government-to-government basis. Through Strategy 6.3 the BIE will be equipped to better engage in multifaceted communication with Tribal leadership.</p>
<p>"I think everybody would agree with me -- is the line budget to BIE's Strategic Plan. There's got to be some funds connected to this. We're short already. We've been short. This is what happens when we do these things that we need to do. We need to hire people and pay them a good salary." [TCU President].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"Do you have a timeline? I know you said December. Can you tell us what goes on after that, how many years or is it months?" [Tribal Leader].</p>	<p>The BIE amended the Draft Strategic Plan Proposal in light of its thorough review of all comments submitted during the consultation process. Beginning on July 1, 2018 the BIE will begin its implementation efforts through a five (5) year timeframe.</p>

<p>"I think you're getting there especially with goal one because I think the earlier we start with the pre K, kindergarten, getting them on an educational plan, letting them have the vision that they can be whatever they want to be and I think you're getting there. And so it just takes time." [Public School Teacher].</p>	<p>BIE appreciates the support for the High-Quality, Early Childhood Education Mission Area.</p>
<p>"All of the schools that are in each of the states, why are they not given the same assessments and following the curriculum if they're in that state?" [Public School Teacher].</p>	<p>Under current regulations BIE administers twenty-three (23) state assessments. BIE students are tested according to each state where its schools are located. Pursuant to the Every Student Succeeds Act (ESSA) BIE has been directed to establish standards, assessments and accountability system through negotiated rulemaking. The BIE is currently pursuing such a system through its negotiated rulemaking efforts.</p>
<p>"So on careers, is that focused on trade schools? Do the BIE schools actually interact with the vocational schools instead of individual students?" [Tribal Leader].</p>	<p>In both Goals 3 and 4, college and career ready includes opportunities for students to attend trade schools should they wish to do so.</p>
<p>"On all the goals you've got all students are going to do this and that. How can you make a flat statement like that because not all kids have access to the kind of family that can actually support them and so forth? So, I mean, to me that's an ambiguous term all." [Tribal Leader].</p>	<p>The Strategic Direction utilizes the term "all" to represent all students to reflect the BIE's commitment to each of its students. The plan is ambitious and strives to improve the outcomes of all students.</p>
<p>"...each different location would have some flexibility in accomplishing these goals. I'm glad that you don't have it well defined because that leads me as long as you keep giving them flexibility..." [Unidentified].</p>	<p>The Strategic Direction is intentionally designed to allow for flexibility in each local context while building a strong education system for all.</p>
<p>"...but I think we still have concerns about the reorganization of the BIE... can we have time to talk about our office in Oklahoma City and where we are on the restructure?" [Tribal Leader].</p>	<p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>

<p>"a (sic) teacher exchange program a teacher from one BIE tribal school can exchange with another teacher for at least a year to broaden teacher's teaching perspective." [Public School Teacher].</p>	<p>The BIE views this as an example of an activity that could be part of an action step; however, the focus on recruitment and retention in the plan goes beyond individual activities to larger long-term strategies to effectively address the issue of recruiting and retaining highly-effective teachers.</p>
<p>"...would also like to reiterate the importance of BIE changing all of the "If" statements in the proposed Strategic Plan to "When" action oriented statements." [Education Organization].</p>	<p>The BIE's reasoning for utilizing "if" statements in the Draft Strategic Plan Proposal was to ensure that Tribal leaders and stakeholder understood that, as presented, the document was subject to change in light of input received through the consultation process. As originally intended, the Strategic Direction replaces all "if" statements with "when" action-oriented statements.</p>
<p>"...recommend[] that BIE ensure that there is alignment between BIE's current Reform and its proposed Strategic Plan. This includes having culturally appropriate support systems at the school, tribal, regional, and national level." [Education Organization].</p>	<p>In light of consultation comments received, the BIE added a robust introductory section between pages i and 13 of the Strategic Direction, which includes specific references the ongoing Reform. Additionally, the BIE has worked to ensure that the Reform is embedded into its Goals, Strategies, Milestones and Actions.</p>
<p>"Greater integration can also be accomplished by connecting the proposed six goals to early learning all the way to college and beyond." [Education Organization].</p>	<p>Goals 1, 3 and 4 identify, delineate, and connect early childhood, K-12 and post-secondary education to ensure a coordinated pathway for students to achieve their goals.</p>
<p>"BIE has a long history of making determinations of what is best for Native students without input from tribal leaders and the unique school communities the agency serves. BIE needs to provide an explanation of how recommendations from local communities whose children attend BIE funded schools will be incorporated. Furthermore, [we] request[] that BIE provide a justification for recommendations that were not included." [Education Organization].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts, the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to</p>

	<p>execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"...recommend[] there be a clear alignment between BIE's Strategic Plan and the agency's internal budget requests that Native organizations also advocate for annually." [Education Organization].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"Having done a lot of research on Wellness (2.1) and a little on personal competencies (3.6), it is apparent to me that there is going to be some redundancy...[i]deally we want both concepts to complement each other without redundancies." [BIE Employee].</p>	<p>The BIE intentionally designed each milestone and action for strategies 2.1 and 3.6 to minimize duplication and build upon mutual successes.</p>
<p>"Integrity-Although this seems like a great statement, the BIE has been accused of unprofessionalism and a lack of high standards of character for years. And the accusations have not always been unfounded. This may be rewritten to reflect that this is what we are striving for." [BIE Employee].</p>	<p>The Strategic Direction is aspirational, yet realistic, and the Values Statement represents what BIE expects in its employees moving forward.</p>
<p>"Strategy 1.1 explanation Tribes and tribal programs are familiar with the unique barriers that are present in their individual communities, the BIE should not be attempting to tell Tribes what those barriers are or how to address them." [BIE Employee].</p>	<p>The Strategy 1.1 explanation emphasizes BIE's commitment to having strong partnerships with Tribes, and its other partners, in order to cooperatively identify and address barriers to high-quality early childhood education.</p>
<p>"1.3 Are we taking responsibility from the tribes who have early education programs? This should be removed particularly when it states in the strategy</p>	<p>No. This strategy does not supplant any existing Tribal, federal, or state programs; rather, the purpose of this Strategy is to explore whether the BIE</p>

<p>explanation that there are possible funding mechanisms that might be available.” [BIE Employee].</p>	<p>can supplement existing programs by providing an early childhood education initiative.</p>
<p>“Strategies 2.1 and 2.3 sound very familiar and could be combined since they both strive to address the knowledge, skills and behaviors necessary for physical, mental and emotional well being (sic).” [BIE Employee].</p>	<p>BIE appreciates this suggestion; however, after substantive review it has been determined that the Strategic Direction will be implemented more effectively by differentiating individual student wellness from physical safety practices and interventions.</p>
<p>“2.2 refers to behavioral health services, will additional funding be provided for these services?” [BIE Employee].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>“Strategy 3.1 This has not happened in the past, how will this be addressed?” [BIE Employee].</p>	<p>The BIE recognizes that the full implementation of the Strategic Direction, including Strategy 3.1, will require a systemic change. Each milestone and action associated with each given strategy identifying specific steps that will be taken in order to achieve full implementation.</p>
<p>“3.3 notes standards this is a term associated with the Common Core and should be removed so that the whole strategy is not tied to Common Core since that theory of instruction could change in the future.” [BIE Employee].</p>	<p>As utilized in Strategy 3.3, the term “standards” refers to levels of skill attainment for students, not specifically the Common Core State Standards. Although some states have moved away from Common Core State Standards, the term “standards” is being used because each state has adopted specific standards that define what a student needs to progress through school.</p>
<p>“4.4 if we are trying to work with tribes throughout the country then we should not be excluding their tribal colleges by specifying Haskell and SIPI. It would be better to refer to tribal colleges and universities which would include Haskell and SIPI.” [BIE Employee].</p>	<p>Strategy 4.4 does explicitly includes Tribal Colleges and Universities in its language. The Strategy is not narrowly limited to Haskell and SIPI.</p>

<p>"5.1 explanation does this mean that tribes and school boards will now be in charge of overseeing the Bureau operated schools in their area?" [BIE Employee].</p>	<p>No. It is the responsibility of BIE to oversee BIE operated schools. However, BIE will work collaboratively with interested Tribes to build their capacity to exercise sovereignty over education should they chose to do so.</p>
<p>"5.2 explanation-will the Bureau change its funding structure to match/align and support (give more money to) tribal education programs (and therefore give less to schools) throughout the country whether the tribal education program operates in accordance with federal law or not?" [BIE Employee].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"6.1 as federal employees aren't we already supposed to have this in place? If this is not the case than (sic) why aren't employees being supported?" [BIE Employee].</p>	<p>BIE recognizes the need to support its staff while also building their capacity to be responsive to the needs of our students, families and Tribes. The milestones and actions related to Strategy 6.1 are designed to strengthen what the BIE already has in place.</p>
<p>"6.3 communication includes "assist BIE in providing effective leadership" (sic) This gives the appearance that we do not already have effective leadership. And initiates the question, why don't we have effective leadership?" [BIE Employee].</p>	<p>Even the strongest leadership teams have room for improvement. Leadership turnover impacts the cohesiveness and effectiveness of leadership teams. Strategy 6.3 focuses on communication to mitigate the impact of turnover and increase leadership effectiveness across the Agency, not just at the top.</p>
<p>"It should be noted that this strategic plan is still in the INPUT and MODIFICATION stage, and that the full application/implementation of the strategic plan will take about 5 years." [BIE Employee].</p>	<p>The BIE amended the Draft Strategic Plan Proposal in light of its thorough review of all comments submitted during the consultation process. Beginning on July 1, 2018 the BIE will begin its implementation efforts through a five (5) year timeframe.</p>
<p>"Why aren't the goals and strategies written in such a manner that they can be understood without an explanation being necessary?" [BIE Employee].</p>	<p>It is often difficult to find the right words to reach all audiences, therefore an explanation is provided for each goal and strategy so all audiences can understand the thought and reasoning behind the selection of each goal and strategy.</p>

<p>"in reference to the Vision statement]...sounds more like definition of what BIE is." [BIE Employee].</p>	<p>The Vision Statement describes what the organization strives to be in the future.</p>
<p>"[in reference to the Values statement]... the way these are stated is how BIE is doing things, (sic) rather than what the BIE values. The last bulleted item sounds like a top down or us and them statement; (sic) the BIE supports schools, We (sic) are the BIE we are all stakeholders." [BIE Employee].</p>	<p>The values are written in present tense because they reflect the values needed every day to carry out the Mission and achieve the Vision.</p>
<p>"goal [1] explanation should not try to justify, but should briefly state how this will happen, such as through birth -age 4 educational programs. Perhaps even mention some of the types of pre-school programs, i.e. Montessori, Waldorf, Bank Street, High Scope." [BIE Employee].</p>	<p>The plan is flexible to allow for the selection of specific programs at the local level based on local context and needs. Therefore, specific programs are not mentioned in the goals or strategies.</p>
<p>"2.2 may give a sense of negligence on the part of BIE." [BIE Employee].</p>	<p>BIE recognizes the urgent need to address the behavioral health issues of students, families and even staff. Despite great efforts by many, data continues to show the need for more training, supports and services to build resilience, strong self-esteem and coping skills so that students are able to learn and perform at high levels.</p>
<p>"the (sic) [Goal Two] explanation should include how we can make this happen; such as programs in health physical education, music, art, counseling, extracurricular athletics, etc." [BIE Employee].</p>	<p>The plan is flexible to allow for the selection of specific programs at the local level based on local context and needs. Therefore, specific programs are not mentioned in the goals or strategies. Milestones and actions may refer to general initiatives as part of local choice.</p>
<p>"goal (sic) 6 is okay but should mention how we will be transparent. Mention how we will measure stakeholder satisfaction." [BIE Employee].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p> <p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional</p>

	<p>silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>"I do not understand why you included If and then statements. It gives a sense of uncertainty. The explanations seem redundant, it would be better to limit the explanation to either the goal or strategies. If a needs assessment was to be included it should have been placed at the beginning of the document, and not inserted within the document." [BIE Employee].</p>	<p>The BIE's reasoning for utilizing "if" statements in the Draft Strategic Plan Proposal was to ensure that Tribal leaders and stakeholder understood that, as presented, the document was subject to change in light of input received through the consultation process. As originally intended, the Strategic Direction replaces all "if" statements with "when" action-oriented statements. Additionally, BIE felt it was important to include the "then" statements in order to describe expected outcomes of the work.</p>
<p>"Maximizing Human Capital through best practices in human resource, especially in recruitment and retention, professional development opportunities, mentorships, scholarships, and alternative program for teacher and leader certifications." [BIE Employee].</p>	<p>BIE understands that highly effective principals, teachers and staff are essential to delivering students a high-quality education. Strategy 3.1 and 3.2 address such human capital needs.</p>
<p>"Funding our Programs and Services Efficiently and Equitably (sic). (this would mean having highly effective grant writers with the initiative to explore all sources of funding such as grants and donations so that all our students will benefit whether school programs for teacher and leaders are performing or in a state of improvement. Also training all of our business techs to work effectively with little supervisions)." [BIE Employee].</p>	<p>The Strategic Direction identifies specific work, not positions. In many cases the work will be completed through collaborative teams, not just one position.</p>
<p>"Incorporating administrative services under direct leadership and supervision of one specialist for each ERC so that principal can focus on instructional leadership to enhance teacher quality and student learning." [BIE Employee].</p>	<p>After reviewing all comments received through the consultation process the BIE added Strategy 3.8 which directly addresses a system of school improvement, technical assistance and support.</p>

<p>"[In reference to the Values statement] Integrity-This has to happen rather than be merely a philosophy...the process of applying, rating, interviewing, and selecting prospective candidates must be revisited." [Unknown].</p>	<p>The Strategic Direction is aspirational, yet realistic, and the Values Statement represents what BIE expects in its employees moving forward.</p>
<p>"The BIE and the FACE program need to collaboratively address this issue, as the FACE program limits the children allowed to be enrolled...the Head Start Programs on the Navajo Reservation are operated in a sporadic manner when funding is available. What is needed is a comprehensive preschool program in all BOE schools." [Unknown].</p>	<p>Implementation of Goal One will not supplant any existing Tribal, federal, or state programs; rather, the purpose of the entire Goal is to holistically identify and remove barriers to student access to high-quality early childhood education, including the establishment of an early childhood education initiative.</p>
<p>"Families have to be willing to strive for self-determination and independence, relinquishing the hold on them by the mindset of learned helplessness. Schools and outside resources can only be as effective as the families allow." [Unknown].</p>	<p>After reviewing all comments received through the consultation process the BIE added Strategy 3.7 which identifies the need to work collaboratively with schools, communities and families. The BIE is committed to working collaboratively and transparently with its Tribal and education partners, including families and communities.</p>
<p>"A necessary condition required of all students, native or otherwise, is resiliency and other strategies to act on their worlds in a manner most beneficial to themselves and their tribes...we need to teach students the strategies, and provide them with the resources to repudiate that which will push them off course." [Unknown].</p>	<p>BIE acknowledges the need for students to acquire personal competency skills, practices and behaviors. Strategy 3.6 focuses on the specific means by which the Agency will work to provide such skills, practices and behaviors.</p>
<p>"I wonder how the word preeminent was selected...It is doubtful we can be preeminent with the issues surrounding schools with lack of resources, funding for construction, and low attendance graduation rates. I suggest 'The BIE provides the services and supports to foster lifelong learning in all our schools to enhance student success.'" [Unknown].</p>	<p>The Strategic Direction is aspirational, yet realistic, and the Vision Statement represents what BIE expects to achieve through its implementation work.</p>
<p>"As I read the draft mission statement these words stood out provide, prepare, preserve. The draft mission statement in my opinion is inclusive and can aptly apply to all of BIE's programs and services." [Unknown].</p>	<p>BIE appreciates the validation of the Strategic Direction's Mission Statement.</p>

<p>“The four priority areas and the core values are essentially the same. The primary difference in the proposed values is the emphasis on core value and end outcome. It would be helpful to note how the current plan's goals/priorities fared. Were they accomplished? Was there work in progress? Were there success stories?” [Unknown].</p>	<p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p> <p>As part of each yearly evaluation of milestones and actions, the BIE will provide reporting information for Tribes, school boards, employees and other stakeholders to inform their feedback and input for the mid-cycle status update during Year Three. This process is intended to ensure transparent and ongoing collaboration and coordination with Tribes, school boards, employees and other stakeholders as future year milestones and actions are identified and implemented pursuant to the Strategic Direction's goals and strategies.</p>
<p>“Strategic Plan I would like us to think about Student Voice (sic) in the Strategic Plan as one way to give direct ways in which students k-higher ed (sic) in the empowerment of what they want in the BIE.” [BIE Employee].</p>	<p>Although students were not separately engaged through formal communication, the BIE undertook a robust communications outreach while formulating the Strategic Direction. From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p>

	<p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary. The BIE welcomes comments from stakeholders, including students, during the mid-cycle status update process.</p>
<p>"It should read "The Bureau of Indian Education (BIE) is the preeminent provider of high-quality educational services and supports to students at BIE funded schools to foster lifelong learning." The vision statement is poorly chosen. BIE is already the preeminent provider...because BIE is the only provider of services and supports." [TC Superintendent].</p>	<p>The Strategic Direction is aspirational, yet realistic, and the Vision Statement represents what BIE expects to achieve through its implementation work.</p>
<p>"The core value of Respect is laudable, but I am not aware of any BIE-supported school communities. For instance, there are several BIE funded schools on the Hopi reservation, and I have not seen a BIE -led efforts to support our "mutual regard and collaboration." [TC Superintendent].</p>	<p>The Strategic Direction is aspirational, yet realistic, and the Values Statement represents what BIE expects in its employees moving forward.</p>
<p>"I agree with the Bureau of Indian Education Strategic Direction document. The document has affirmed that change is needed in all recommended areas. I believe in educational opportunities, support of funding, effective leadership and program supports is greatly need (sic) for our learners." [TC School Representative].</p>	<p>The BIE appreciates your validation of the Strategic Direction and is committed to effectively implementing its goals and strategies to improve the education of our students.</p>
<p>"Will there be funding available for contract specialists for behaviors? How are we holding tribes grant school accountable just like bureau operated schools?" [BIE Employee].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels,</p>

	the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.
"Will funding be available for all sections of the initiative. Are we providing more work for employees as they already wear many hats in our small school?" [BIE Employee].	The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.
"I think early childhood should be at every BIE school because right a lot of students (sic) have academic problem. Most kindergarten students have no preparation for education." [Unidentified].	BIE agrees that expanding access to early childhood education opportunities would greatly benefit Indian students. Thank you for validating the importance of High-Quality, Early Childhood Education Mission Area of the Strategic Direction.
"I have no comments on the Goal and Strategies. I have read and also been in a discussion with other over the mission area and goals." [Unidentified].	BIE appreciates the time you committed to reading and discussing the Draft Strategic Plan Proposal.
"Will the BIE plan have specific guidelines regarding age when kindergarten starts." [Unidentified].	The BIE will ultimately provide such details with regard to eligibility requirements as work on the potential BIE Early Childhood Initiative matures.
"I especially like the Core Values because it describes the way we thrive to do our best for our Native American students." [Unidentified].	BIE appreciates the time you committed to reading and discussing the Draft Strategic Plan Proposal and is committed to implementing its Core Values.
"Overall the plan is well written. It is well thought out plan, if any changes needed it will be minor." [Unidentified].	BIE appreciates the time you committed to reading and discussing the Draft Strategic Plan Proposal.
"All BIE schools should have pre-k program and funding for pre-k. Funding for all 3 to 4 year old children should be able to have a (sic) opportunity to attend access preschool, Pre-k or FACE programs. Not just very low income children to develop funding, also provide highly qualified early childhood teachers and paraprofessionals." [Unidentified].	BIE agrees that expanding access to early childhood education opportunities would greatly benefit Indian students. Thank you for validating the importance of High-Quality, Early Childhood Education Mission Area of the Strategic Direction.

<p>"I feel it is important to communicate the expectations of school to parents so that they can prepare their child for schools. Parents need training and some guidance on how to help their child in school, about development, and what to look for if their child is not progressing or developing according to age. Thank you for your support." [Unidentified].</p>	<p>After reviewing all comments received through the consultation process the BIE added Strategy 3.7 which identifies the need to work collaboratively with schools, communities and families. The BIE is committed to working collaboratively and transparently with its Tribal and education partners, including families and communities.</p>
<p>"Schools must provide programs and interventions to assist students. It is not an IF!" [Unidentified].</p>	<p>The BIE's reasoning for utilizing "if" statements in the Draft Strategic Plan Proposal was to ensure that Tribal leaders and stakeholder understood that, as presented, the document was subject to change in light of input received through the consultation process. As originally intended, the Strategic Direction replaces all "if" statements with "when" action-oriented statements.</p>
<p>"[Referencing Goal Four] [m]ore needs to be implemented in this area. More exposure for students to take advantage of such as summer programs or internships at universities or colleges." [Unidentified].</p>	<p>Goal Four of the Strategic Direction includes expanding learning opportunities, supporting transitions and career planning.</p>
<p>"I feel this goal is vast and all involved need to buy into the idea as well as engage in opportunities to model this." [Unidentified].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts, the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement</p>

	<p>milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"This is an ongoing process and our school seems to be doing well in this area although we are a large school and a lot of the activities are by department rather than as a whole school." [Unidentified].</p>	<p>BIE appreciates the time you committed to reading and discussing the Draft Strategic Plan Proposal and looks forward to collaboratively working with your school as we implement its goals and strategies.</p>
<p>"Provide state and local level support outlets, if local not available recommend state interventions; keep consistent and ongoing communication with health promotions; Coordination with SPARK movement program and fitness-gram encourages positive wellbeing (sic)." [BIE Employee].</p>	<p>The plan is flexible to allow for the selection of specific programs at the local level based on local context and needs. Therefore, specific programs are not mentioned in the goals or strategies.</p>
<p>"Recommend a school psychologist per department Character Building program, support group sessions through counseling (need more counselors and group sessions), need to follow-up on students who get services at TCBS." [BIE Employee].</p>	<p>Strategy 2.2 of the Strategic Direction provides specific milestones and actions regarding the implementation of behavioral health supports and service.</p>
<p>"Physically utilize/increase health promotion programs and wellness (on school site, i.e. nutrition, cooking, etc.), intramurals for students who do not want to complete food desert-lack of healthy affordable/cheap options, outdoor play limited, dogs, dangerous." [BIE Employee].</p>	<p>Goal Two of the Strategic Direction provides specific strategies, milestones and actions regarding the implementation of student wellness supports and service.</p>
<p>"Communication on all levels with all stakeholders, teachers included in decision-making for funding, appropriation, IT, curriculum/supplies, equipment." [BIE Employee].</p>	<p>Goal Six is specifically designed to equip the BIE with the tools necessary to become a data driven decision making organization which provides accurate and timely multilateral communication. BIE is committed to improving its</p>

	<p>communications with all stakeholders. Strategy 6.3 identifies concrete work that furthers the Agency’s work to improve such communication.</p>
<p>“Meet criteria school wide; be real on implementing all voices to be heard-data driven decision making - use real people voices not technology data; communication needs to be clear; teachers never see the end product.” [BIE Employee].</p>	<p>Goal Six is specifically designed to equip the BIE with the tools necessary to become a data driven decision making organization which provides accurate and timely multilateral communication. BIE is committed to improving its communications with all stakeholders. Strategy 6.3 identifies concrete work that furthers the Agency’s work to improve such communication.</p>
<p>“The strategic plan does not indicate which actions are currently in place already and the strategic plan is repackaging old programs and making them look new again. For example, your program of early education sounds like your FACE program. FACE is failing our schools and students. We need a program that impacts more youth. FACE programming has too many rules for families. We need a better program.” [Tribal Leader].</p>	<p>No strategic plan is currently in place. Previously the BIE undertook preliminary planning efforts, but such planning activities never culminated in a finalized plan. This Strategic Direction will serve as a completed, formal strategic plan to be implemented for the BIE.</p> <p>With regard to Goal One, the Goal does not supplant any existing Tribal, federal, or state programs; rather, the purpose of this Goal is to explore whether the BIE can supplement existing programs, such as FACE, with other programs such as Head Start and a BIE early childhood education initiative.</p>
<p>“The strategic plan lacks timelines and metrics for stakeholders to show when the goals have been achieved. A simple tool like the SMART would be a helpful way of understanding who, what, when, and how your strategic plans will be achieved. SMART is defined as being specific, measurable, achievable, results-focused, and time-bound.” [Tribal Leader].</p>	<p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year’s progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p> <p>As part of each yearly evaluation of milestones and actions, the BIE will provide reporting information for Tribes, school boards, employees and</p>

	<p>other stakeholders to inform their feedback and input for the mid-cycle status update during Year Three. This process is intended to ensure transparent and ongoing collaboration and coordination with Tribes, school boards, employees and other stakeholders as future year milestones and actions are identified and implemented pursuant to the Strategic Direction's goals and strategies.</p> <p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p> <p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>"The BIE's Strategic Plan is repackaging old programs and making them look new again. For example, your program of early education sounds like your FACE program. FACE is failing our schools and students. We need a program that impacts more youth. FACE programming has too many rules for families. We need a better program." [Tribal Board of Education].</p>	<p>No strategic plan is currently in place. Previously the BIE undertook preliminary planning efforts, but such planning activities never culminated in a finalized plan. This Strategic Direction will serve as a completed, formal strategic plan to be implemented for the BIE.</p> <p>With regard to Goal One, the Goal does not supplant any existing Tribal, federal, or state programs; rather, the purpose of this Goal is to explore whether the BIE can supplement existing programs, such as FACE, with other programs such as Head Start and a BIE early childhood education initiative.</p>
<p>"It does not clarify who is responsible for each goal in the Strategic Plan. The Strategic Plan must be specific to the Director, Area Division Directors, Bureau of</p>	<p>BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a</p>

<p>Indian Affairs Director. Also, the Strategic Plan does not address BIE’s internal lack of accountability for non-compliant and non-cooperative ADDs. There are several departments that operate out of step with the Director’s goals. We need clarity on which department...will be held accountable for these strategic goals.</p> <p>The BIE’s Strategic Plan lacks timelines and metrics to show when the goals have been achieved. The BIE impacts many educational entities on the Navajo Nation and it’s not clear how each entity will work in a unified manner to meet our goals as a nation. The Navajo Nation Board of Education demands that a simple tool like the SMART would be a helpful way of understanding who, what, when, and how your strategic plans will be achieved. SMART is defined as being specific, measurable, achievable, results-focused, and time-bound.</p> <p>The BIE’s Strategic Plan does not distinguish between federal mandated requirements required by your funding to a streamlined goal that will avoid duplication of services and duplicate demands on schools.” [Tribal Board of Education].</p>	<p>collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities. BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau’s data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction’s implementation.</p> <p>The Strategic Direction is intentionally designed to minimize duplication and build upon mutual successes. Cross collaborative teams working on related milestones will work cooperatively to ensure that implementation is carried out comprehensively and efficiently.</p>
<p>“One of the things that should be included as part of the strategic planning is the funding, how we should be assisted in how we acquire or want to get funding.” [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>“And that's where we go wrong sometimes, and they don't listen to us no matter what we say. I mean, we have gone through different comments about everything, and a lot of times they don't listen to us. Until we set whatever planning is in place, they set a comment period, we send comments. A lot of times, they don't respond. A lot of times they don't listen to what we say. I am glad you are saying you are going to at least put everything down, whatever comment there is, why we might want to implement it and why not. Those are important. Thank you.” [Tribal Leader].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p>

	<p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"...The overarching question is funding, and you are looking to implement plans and strategies. Do you have the funding available?" [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"The premise of any strategic plan is to first and foremost have a firm foundation on which to build. The BIE in its current state is not firm with regard to understanding of what their role is and much less what the role and expectations of tribally controlled schools should be. The BIE needs to recognize that any plan they create can only apply to the BIE operated schools." [Tribal Leader].</p>	<p>Effective implementation of the Strategic Direction will require the BIE to work collaboratively on a government-to-government basis with Tribes. The BIE looks forward to working in close partnership with its Tribal partners through the Strategic Direction.</p>
<p>"...the BIE cannot require they implement these goals and strategies. The BIE can best support tribally controlled schools by providing funding to support the tribe's and the school's initiatives in a timely manner which is making these funds available at the beginning of the school year. We are concerned that the BIE's continued lack of funding and the on and off again reorganization efforts...[a] continued failure is the appropriation of funds.</p>	<p>Effective implementation of the Strategic Direction will require the BIE to work collaboratively on a government-to-government basis with Tribes. The BIE looks forward to working in close partnership with its Tribal partners through the Strategic Direction.</p> <p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels,</p>

<p>The current foundation of the BIE misappropriates, or at best, allocates unequally the BIE resources between BIE schools and tribally controlled schools...[m]ore than half, 67 percent, of BIE resources for technical assistance and support have been assigned to BIE operated schools, even though they have less than 50 percent of the funded schools...tribally controlled grant schools make up the vast majority of schools. However, the BIE has assigned and allocated less than half the number of staff to assist with technical assistance and support.” [Tribal Leader].</p>	<p>the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p> <p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>
<p>“...hope that, you know, whatever plans that are put forth really are focused on students first, on the students and how we want to serve them and how we are going to bring them up to the level where we have, like our mission statements and our vision statements and our values, so that they can be successful in their own ways, in their own tribally described ways.” [Tribal School Board Representative].</p>	<p>BIE acknowledges that there is great need to improve. Change is difficult, and will not happen instantly. Nonetheless, the BIE Strategic Direction is intentionally student focused and is designed to be a practical and realistic tool to improve the educational services provided by the BIE over the course of five years.</p>
<p>“One of the things is that I looked at the Strategic Plan that was proposed in 2014 onto '18...which looked like it's ending in 2018...proposal proposed one or more that never came off...</p> <p>I would like to see a whole lot of funding allocated toward all of the goals that you have regarding 1 to 6...</p> <p>So your staff development emphasis in the first one, I thought that was the first one that you were highlighting on your employees. And I find that a little bit of a problem when an organization starts looking at pleasing and appeasing their employees before they even look at students...</p> <p>The other thing about it is the BIE reorganization, that is halfway approved. That is not fully approved. It is being treated as if it is completely approved...</p> <p>The other one I think is very commendable is a staff development plan...</p> <p>The other one is that the education program administrator is not equal to an education line officer, so they cannot be responsible for the performance of the school principals.</p>	<p>No strategic plan is currently in place. Previously the BIE undertook preliminary planning efforts, but such planning activities never culminated in a finalized plan. This Strategic Direction will serve as a completed, formal strategic plan to be implemented for the BIE.</p> <p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p> <p>The BIE is committed to improving the services delivered by its employees. Strategy 6.1 and 6.4 are intentionally designed to equip our employees with the tools necessary to provide high-quality services while simultaneously ensuring accountability, including guaranteeing that all applicable statutory and regulatory requirements are fulfilled. Moreover, the Values Statement represents what BIE expects in its employees moving forward.</p> <p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction</p>

<p>The other one that concerns us is just ignoring the law, ignoring the provisions that are based on law 95-561. And then in 95-561, there is a whole lot of excellent verbiage and language in there on how the secretary is going to administer this plan for schools and how students are going to be served and the quality...</p> <p>The other one is on communication. I like all your goals. I think they are very good goals. But in terms of communication and transparency, you sound very good on paper right here. But out there, we are still asking a lot of questions...</p> <p>...there is a Department of the Interior and perhaps an education department under BIE for a code of conduct for its employees. They ought to be held to the highest standard of integrity and ethics when it comes to working with our local folks...</p> <p>Otherwise, I like the document. I like where there is, all students are going to do this, and I really look forward to that action plan as to when and how we are going to measure these things, who is going to be responsible, when is it going to be evaluated and how is it going to gauge the performance..." [Tribal School Board Representative].</p>	<p>focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p> <p>Goal Six is specifically designed to equip the BIE with the tools necessary to become a data driven decision making organization which provides accurate and timely multilateral communication. BIE is committed to improving its communications with all stakeholders. Strategy 6.3 identifies concrete work that furthers the Agency's work to improve such communication.</p> <p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p> <p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>"[Referencing SCAN reports] [t]hey are reported at the school level, and they stay there, and statutorily they are not supposed to, but they are. Maybe it's the lack of this, where is this other 42 percent? What is that? How many are missing? Over 50 percent that have not been hired and put in place." [Tribal School Board Representative].</p>	<p>Through implementation of the Strategic Direction the BIE will work towards improving its internal process and procedures, including those involving SCANS reporting. With regard to staffing levels, the BIE is continues to work to increase its human capital capacity to provide high-quality educational services.</p>

<p>"...Education Resource Centers...are not fully functional. I am wondering where is this money that was supposed to go there? ...The latest I heard from Interior over Thanksgiving dinner was that there is about \$12 million in the BIE that needs to be spent and justified. Otherwise, it goes back to the treasury. That is not good news for Indian Country. So that's my comment on that one." [Tribal School Board Representative].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"When you guys talk about consensus, how are you defining consensus? Because what does that equate to? One person, two persons, up to 10? So there is really no way to create consensus when all of the tribes here are very different. So are you asking for us to define that for you, or are you developing your own way? So that's my question." [Tribal Leader].</p>	<p>100 percent unanimous agreement is not possible. However, the goal of the strategic planning consultation process was to establish general support across Indian Country regarding the themes addressed in the Strategic Direction.</p>
<p>"And then lastly, to ensure continuous transparency during this tribal consultation process in the sessions. And then what is done with all these recommendations, you said you would share back with the stakeholders, so moving that forward and staying true to that whole issue of voice of transparency to ensure that collaboration and coordination does continue beyond just the sessions in the final plan being put together." [Tribal Leader].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>

<p>"I hope you don't use the Public Law 638, Indian Self-Determination, because that law was passed to allow tribes to become self-determined, but what did they do? They told the tribes, here is how you are going to become self-determined. They put rules and regulations, standards, and all of those things as part of the requirement to become self-determined." [Tribal Leader].</p>	<p>BIE is committed to working with each individual tribe to support their right to educational self-determination. Tribes have the sole power to decide whether to assume direct control over their schools. Additionally, Tribes have the sole power and discretion to choose how such assumption of management and control takes place, whether through P.L. 297 or P.L. 638.</p>
<p>"This is straightforward and simple. I like this idea, and maybe because I am a guy for strategic planning to reach our goals and objectives, because it makes it work. And I like the way you formatted it, because now you are looking at education, not just as education, but inclusive of all of the other things that need to be part of that educational process." [Tribal Leader].</p>	<p>BIE agrees that acknowledging the history of Indian education is important. As a result of this comment and others, the BIE has drafted and included a historical introductory section to the Strategic Direction.</p>
<p>"My question is, so the deadline for comments is January 13th, and then from there to September 2018 you are going to develop this plan. So what happens between January 13th and September, are you going to come back to us and say this is the document that we put together, what do you think of it? Or are we going to have a continued say in this whole process, or is there a cutoff line where this is it? So this becomes the BIE Strategic Plan?" [Tribal Leader].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones;</p>

	<p>and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"At the beginning of your presentation, you had said that these are guidelines of BIE schools' employees, so if you talk about language and culture, how is that BIE school going to be able to determine what is in the best interests of their students? If you set guidelines that this is for BIE schools -- and for grant schools, then that's different. I can see that transition, because they have a voice. But for BIE programs, I don't really see the school having a voice, like a board that is more of an advisor than they are the leaders and the visionaries of the school." [Unidentified].</p>	<p>After reviewing all comments submitted through the consultation process, the BIE amended the language strategy to reflect the input received. Specifically, the Strategy was moved from Goal Three to Goal Five. Additionally, the Strategy is intentionally designed to allow the BIE to work with individual Tribes regarding how they want BIE to support culture and language.</p>
<p>"...it's really kind of disheartening to hear that this strategic plan is being developed because of an audit from the general accounting office...we should have done a strategic plan without being told to do so. The other thing is, you in particular keep referencing this as an aspirational document. We aspire to be here. The problem with that is our issues in our schools are real. They are today...</p> <p>You talk about behavioral health. A lot of our students face behavioral health issues, at least at home. Those issues need to be dealt with...</p> <p>...right now the proposed 2018 budget is cutting BIE funding by \$105 million. Early childhood alone is being cut by \$10 million." [Tribal Leader].</p>	<p>No strategic plan is currently in place. Previously the BIE undertook preliminary planning efforts, but such planning activities never culminated in a finalized plan. This Strategic Direction will serve as a completed, formal strategic plan to be implemented for the BIE.</p> <p>Strategy 2.2 of the Strategic Direction provides specific milestones and actions regarding the implementation of behavioral health supports and service.</p> <p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"...the plan that you have been sharing with us is very broad. We are missing the actual steps in how we are actually going to implement achieving these goals...we have to have the resources at the school level to be able to implement steps to begin to work toward these aspirational goals that you are talking about. One of the areas where we really need some help funding wise...</p> <p>There are behavioral issues, and then when we try to deal with behavioral issues, there are not enough resources to deal with behavior." [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p> <p>Strategy 2.2 of the Strategic Direction provides specific milestones and actions regarding the implementation of behavioral health supports and service.</p> <p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of</p>

	<p>the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p> <p>As part of each yearly evaluation of milestones and actions, the BIE will provide reporting information for Tribes, school boards, employees and other stakeholders to inform their feedback and input for the mid-cycle status update during Year Three. This process is intended to ensure transparent and ongoing collaboration and coordination with Tribes, school boards, employees and other stakeholders as future year milestones and actions are identified and implemented pursuant to the Strategic Direction's goals and strategies.</p>
<p>"We felt this was very important, because it's a consultation hopefully that we have our words and feelings known to BIE. I know, something I mentioned earlier this morning, sometimes we don't get that far. We don't get a response. I have gone to many consultations, and they tell us they will follow back up, and we never get a response back from them." [Tribal Leader].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement</p>

	<p>milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"Is the money available? ...my question is, this strategic plan, once it's approved or comments are done in January, how much of an impact will the budget have on this plan itself, along with the technical assistance?" [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"I support the initiatives to transform the BIE into an effective national education agency. This agency should be configured, managed, and operated in a manner that ensures the very best educational, social, cultural, and economic outcomes for Indian students. The determining factor in this transformation lies in the ability of the leadership of the Department of the Interior and the BIE to provide a professional proactive environment that supports these goals." [Tribal Leader].</p>	<p>The BIE appreciates your validation of the Strategic Direction and is committed to effectively implementing its goals and strategies to improve the education of our students.</p>
<p>"There is no language in the document that speaks to the BIE and the Department of the Interior's responsibility to maintain effective levels of funding to support the diverse needs of Indian students..." [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"The document is also devoid of language that speaks to enhancing the appropriation of funds to support facilities improvement repair, maintenance improvement and repair, and new school replacement..." [Tribal Leader].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>

<p>“The document appears to be well intended. However, it will need some refining in the areas that I spoke to and what other tribes and stakeholders recommend. The document, as has been stated, provides a 50,000 foot level view and strategic direction for the BIE to move into the 21st century... the management structure of the BIE is left up to the political whims of changing administrations. These whims fail to include the needs of Indian tribes and Indian students. This transience in leadership cannot be solved until the truth is put on the table and for political agendas to be left out of the primary need to provide Indian students a free and appropriate public education.” [Tribal Leader].</p>	<p>The Strategic Direction provides specific milestones and actions designed to achieve the Vision of the Strategic Direction. The issues raised regarding political concerns cannot be effectively addressed through implementation of the Strategic Direction.</p>
<p>“...[G]oal 1 for the early childhood...doesn't align with ESSA. If you look at Title I funding, which can be used for early childhood, the ESSA plan doesn't mention early childhood. All it mentions is juvenile for Title I. So we are getting this plan over here, and this ESSA plan has nothing to do with early childhood. Looking at that, that's a key.” [Tribal Leader].</p>	<p>The BIE will align its State Plan pursuant to ESSA to the Strategic Direction, including Title I of ESSA and Goal One of the Strategic Direction. This will occur during the separate State Plan formulation and consultation process.</p>
<p>“...talking about transparency, the Strategic Plan or a comment was made earlier that BIE was recognized as an additional state. That's not true. If you pull up the BIE's strategic plan or an ESSA plan, it specifically states that on the first pages. That is not true. You are talking about transparency, looking at that, we are being asked to consult on the BIE's Strategic Plan, but at the same time, BIE is making that ESSA plan, which is supposedly being submitted to Congress. Yes, this plan is going to GAO, but that plan could possibly go to ESSA on our behalf, and we are not able to consult on that plan. So you are talking about communication and transparency, and that is a key issue that I find concerning, especially because communication should be No. 1, but it's very down, 6.3, you know.” [Tribal Leader].</p>	<p>As stated during the consultation session, the BIE apologizes for the misinterpretation of its status as an State Education Agency (SEA). For the narrow purposes of utilizing the services of Comprehensive and Content Centers the Department of Education considers the BIE as an SEA. The BIE will work to align its State Plan pursuant to ESSA to the Strategic Direction, including Title I of ESSA and Goal One of the Strategic Direction. This will occur during the separate State Plan formulation and consultation process.</p>
<p>“...[T]he mission, the BIE mission should emphasize that the BIE must rely on us as a partner and advocate in working with Congress to ensure adequate funding for BIE school officials as a whole.” [Tribal Leader].</p>	<p>The Mission of the BIE is defined by federal regulation, located at 25 C.F.R. 32.3. BIE cannot use the Strategic Direction to substantively change its pre-defined Mission.</p>

<p>"It is the belief reflected by Congress in its passage of the Tribal Control Act that we now call upon you to ensure that the BIE mission to provide decentralized decision-making and ensure BIE decisions are the best for the students and the school. Secondly, we have suggestions regarding the partnership ongoing consultation. It should be made and incorporated into the BIE Strategic Plan. To help institutionalize a service based focus, we recommend the department create an advisory committee for its Indian education program made up of local school officials whose schools operate under a tribally controlled grant school, Public Law 102-97, and other authorities. Such an advisory board would help foster school based reform that would benefit students and provide perspective from those of us on the ground which will keep the focus on improving services. We remain very concerned that the BIE officials have adopted the mistaken notion that consultation on Indian education policy only required BIE to consult with central tribal governments. So those are things that we want to bring out." [Tribal Leader].</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making. The Strategic Direction will address formal communications plans and procedures through strategy 6.3. Finally, the BIE recognizes that communication with Tribes, school boards, school leaders, and other stakeholders is critical to successfully achieve its Mission. As noted during each consultation session the order of goals and strategies are not associated with the order of priority for implementation.</p>
<p>"Schools have had a substantial engagement with the BIE reorganization effort that consumed considerable energy over the past years. Under the previous administration, the blueprint for BIE reform called for centralizing decision-making at the headquarters office rather than looking at the schools, local communities, and a correct place for the ideas of change. We believe that the department should consider lessons learned through this process. All parties involved in that effort, including BIE officials, now recognize that bosses moving around an organizational chart has not changed organizational performance...</p> <p>The other thing is that we agree we need to target and focus on improving services that will make a difference in improving school performance. We firmly believe that our parents and our elected school board officials are best suited making these decisions regarding the services and the approach that need to be made to improve school performance based on our familiarity with the unique circumstances affecting our students." [Tribal Leader].</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making. The Strategic Direction will address formal communications plans and procedures through strategy 6.3. Finally, the BIE recognizes that communication with Tribes, school boards, school leaders, and other stakeholders is critical to successfully achieve its Mission.</p> <p>After reviewing all comments received through the consultation process the BIE added Strategy 3.8 which directly addresses a system of school improvement, technical assistance and support.</p>
<p>"...unfortunately we have heard rumors that some officials are considering transferring BIE funds and responsibilities to the states. Not only would that force us to work with three states and create additional layers of bureaucracy added to our educational system, in the end it would harm our children. We are instead working to assume much of the federal responsibility ourselves. We want to</p>	<p>This issue is outside the scope of the Strategic Direction consultation. However, as stated during the Southwest consultation session, the BIE is unaware of any plans to transfer any funds or responsibilities to states.</p>

<p>continue working with BIE to improve our systems, standards, and pursuant to that, so that we can better manage our own children's education. We hope these rumors are not taken seriously. However, if there is any consideration of limited transfer of funds or responsibilities to the states[] [we] strongly oppose[] such a transfer which would undermine federal tribes' responsibility. Thank you." [Tribal Leader].</p>	
<p>"...just acknowledging that, you know, the focus is limited to your employees...you can't dictate to sovereign nations how they work...</p> <p>...And then I am wondering if with language and culture, I mean, I think it's fine in academics, but I think oftentimes we compartmentalize it as separate, like the focus on math and English and then language. But my wondering and suggestion is maybe it belongs with self-determination, but that self-determination shouldn't be 5. It should be No. 1 in the goals..." [Educational Organization].</p>	<p>Effective implementation of the Strategic Direction will require the BIE to work collaboratively on a government-to-government basis with Tribes. The BIE looks forward to working in close partnership with its Tribal partners through the Strategic Direction.</p> <p>As noted during each consultation session the order of goals and strategies are not associated with the order of priority for implementation.</p>
<p>"...in your assessments, when you do your assessments, one of your strategies for 3.5 is, design a course to meet the needs of where the kids are at academically. You can't design a plan to say you are going to meet their needs if you don't have a plan in place to meet their needs, an action plan to do that." [Unidentified].</p>	<p>Strategies 3.3, 3.4 and 3.5 of the Strategic Direction provides specific milestones and actions regarding the implementation of curriculum and assessments.</p>
<p>"So when I look at your strategic plan, I want to think, if I was in fifth grade, I would have asked you this: Where am I in this plan? Where do I belong in this plan?" [Unidentified].</p>	<p>BIE acknowledges that there is great need to improve. Change is difficult, and will not happen instantly. Nonetheless, the Strategic Direction is intentionally student focused and is designed to be a practical and realistic tool to improve the educational services provided by the BIE over the course of five years.</p>
<p>"And then also the people that take on the leadership to lead our people, we should be able to talk to them and they should be able to answer. They put on that shirt, they put on that jacket, for us, in our tradition, if you take on leadership, you put on a shirt, and we call it "ogle tanka un." And when you are a shirt wearer, you are supposed to have that experience to lead. I appreciate you telling us that you are a strategic planner and telling us what you are capable of doing and reaching out and doing this with the tribes." [Unidentified].</p>	<p>Effective implementation of the Strategic Direction will require the BIE to work collaboratively on a government-to-government basis with Tribes. The BIE looks forward to working in close partnership with its Tribal partners through the Strategic Direction, especially with regard to Tribal sovereignty over education in Goal Five.</p>

<p>“As I get older, I am learning, I am also learning communication with states, and sometimes that this is done -- it was done in our state, but it wasn't really done with consultation of the tribe. It was just at a meeting, and then whatever tribe showed up, we wrote them down and that was it. That even trickles down to the district level. I don't know how it's been at the tribal level. That meeting with St. Francis, they set a date that is not friendly to the public, it's not friendly to the parents...” [Unidentified].</p>	<p>The quality of consultations between the State of South Dakota and Tribes is outside the scope of the Strategic Direction. Nonetheless, BIE is committed to working collaboratively on a government-to-government relationship with Tribes as it works to implement the Strategic Direction.</p>
<p>“The Tribe believes the proposed strategic plan is well-developed and aligned to the latest education research.” [Tribal Leader].</p>	<p>BIE appreciates your timely review and substantive comments regarding the Strategic Direction and earnestly looks forward to working with Indian Country as it begins implementation.</p>
<p>“The order [Secretarial Order 3334] was aimed at providing more assistance to tribally education departments, but also reducing and eventually eliminating assistance to BIE funded schools. The order resulted in the elimination of Education Line Officer (ELO) positions, which are required by 25 United States code 2006c...[t]he BIE has established Education Resource Centers (ERC) based on a bizarre pattern where BIE operated schools report to an office in Albuquerque and tribally operated schools report to an office in Minneapolis. The geographic organization is unworkable...there has been little or no definition of functions and duties of the Education Program Administrator (EPA) positions, leading to a loss of communication. The ELOs were required to be certified as school superintendents. The EPAs are not required to have superintendent certification. The EPAs seem to be unsure of their roles and responsibilities. The BIE "blueprint" stated that the reorganization would result in an agile and innovative organization. That has not happened. In fact, training, technical assistance and communication have stopped...</p> <p>We recommend that the organizational structure of the BIE be reestablished as it was prior to Secretarial Order 3334 and that the Educational Line Officers be re-established and that the BIE fill the Education Line Officer positions...be filled with qualified personnel who have education superintendent certificates and experience. All ELO positions be filled with people of competence and integrity and that any BIE organizational structure must comply with and facilitate the objectives of P.L. 95-561.” [Tribal Leader].</p>	<p>As correctly stated in the comment, Secretarial Order 3334 is outside the scope of the Strategic Direction consultation. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>

<p>“The BIE Strategic Plan should contain the Every Student Succeeds Act requirements for educational standards, assessment, and accountability systems. Goal 3 includes standards and assessment.” [Education Organization].</p>	<p>Under current regulations BIE administers twenty-three (23) state assessments. BIE students are tested according to each state where its schools are located. Pursuant to the Every Student Succeeds Act (ESSA) BIE has been directed to establish standards, assessments and accountability system through negotiated rulemaking. The BIE is currently pursuing such a system through its negotiated rulemaking efforts which will align to the Strategic Direction.</p>
<p>“We recommend that the BIE work with tribes and schools to develop a four-year strategic plan to strengthen the education of Indian children in BIE-funded schools. ...We cannot emphasize enough the need for the BIE to work with the schools and not establish goals unilaterally...” [Education Organization].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts, the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year’s progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>“The so-called "strategic plan" meets none of the criteria of a Strategic Plan. There are no baseline indicators of student achievement from which to identify performance measures in a Strategic Plan. There are no objective, quantifiable, or</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau’s data management. As work</p>

<p>measurable goals or objectives. There are no outcome (student-oriented) or output (administrative) goals. There are no explanations of how the schools and the tribes would achieve the goals (if there were any goals).” [Education Organization].</p>	<p>matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction’s implementation.</p> <p>Additionally, BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>“Most importantly the BIE has not worked with the stakeholders-school boards, school administrators, teachers, parents, and tribes- to develop the plan. The BIE is simply presenting its document and going through the motions of pretending to listen to input from tribes.” [Education Organization].</p>	<p>From March through September 2017, the BIE engaged in a strategic performance management process convening local, regional, and Central Office personnel to formulate a Draft Strategic Plan Proposal. Between October 2017 and January 2018, the Draft Strategic Plan Proposal was shared through listening sessions, Tribal consultation and input, comments, and suggestions were gathered to strengthen the draft. The BIE then reconvened local, regional, and Central Office personnel to review and incorporate Tribal consultation input to finalize the Strategic Direction. Following these efforts, the BIE prepared this report in order to facilitate transparent communication with its partners regarding how recommendations were incorporated and/or otherwise responded to.</p> <p>Additionally, BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year’s progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones;</p>

	and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.
<p>"Most concerning is the absence of a realistic discussion or at least acknowledgement of the cost of high-quality pre-K programming and the importance of having a well-prepared and justly compensated workforce...An acknowledgement of the importance of adequate funding would be beneficial because inadequate funding impacts program quality and affordability for families." [Education Organization].</p>	<p>The Strategic Direction will be used to inform and align a budget. However, funding specific initiatives continue to be dependent on annual congressional appropriations. Regardless of future appropriations levels, the BIE is committed to efficiently and effectively utilizing the funding provided annually by Congress.</p>
<p>"...students appear to be the most accountable for developing "the knowledge, skills and behaviors necessary instead of placing that responsibility on schools, community partners and other adult stakeholders in charge of running these programs..." [Education Association].</p>	<p>The Strategic Direction is intentionally student focused and is designed to be a practical and realistic tool to improve the educational services provided by the BIE over the course of five years. The Strategic Direction provides the BIE a roadmap for improving its service delivery to Tribes, schools, stakeholders, and students.</p>
<p>"Interventions should not just be individualized but made schoolwide and there should be more specificity in describing them." [Education Association].</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making.</p>
<p>"Strategy 3.1 We recommend defining and specifying specific actions for "effective process" to recruit, hire, induct and retain principals, teachers and staff." [Education Association].</p>	<p>Strategy 3.1 of the Strategic Direction provides specific milestones and actions regarding the recruitment of principals, teachers and staff.</p>
<p>"Strategy 3.2 more should be said about how to develop career pathways for current employees to gain licensure in their areas. This could include on-site classes, tuition reimbursement, and time student teaching and administrative internships. ...it does not mention a specific structure for teachers to develop their own instructional practices, engage in professional learning or mentorship." [Education Association].</p>	<p>Strategy 3.2 of the Strategic Direction provides specific milestones and actions regarding the development of principals, teachers and staff.</p>
<p>"Strategy 3.3 the plan did not mention the specific standards it is referencing...we would recommend having a uniform set of standards. Regarding culturally relevant instruction and curriculum, this is an opportunity for BIE and tribal stakeholders to augment and supplement core academic subjects." [Education Association].</p>	<p>Under current regulations BIE administers twenty-three (23) state assessments. BIE students are tested according to each state where its schools are located. Pursuant to the Every Student Succeeds Act (ESSA) BIE has been directed to establish standards, assessments and accountability</p>

	<p>system through negotiated rulemaking. The BIE is currently pursuing such a system through its negotiated rulemaking efforts.</p>
<p>“Strategy 6.1 there is no mention of incorporating input and advice of experts in the field - staff and educators, many of whom are represented by labor unions, such as the Federation of Indian Service Employees Union. Collective bargaining agreements pave the way for labor and administrators/management to agree on working conditions, professional development opportunities, professional learning processes, procedures and policies, all of which affect teaching and learning.” [Education Association].</p>	<p>The BIE recognizes transparent communication with its stakeholders, including FISE, is critical to its success. As such, the BIE will implement strategy 6.3 in order to facilitate the multilateral communication of professional feedback.</p>
<p>“Given that Native American, Alaska Native and Native Hawaiian students have the nation's highest dropout rates, lowest graduation rates and highest youth suicide rates, we commend the BIE's efforts on a strategic plan to address these challenges. ...we share the BIE's goal of educational excellence and equity for native students - to ensure they are able to meet the same challenging college- and career-ready standards required of all students. The strategic plan aspires to meet the academic, health and social needs of these students.” [Education Association].</p>	<p>BIE appreciates your timely review and substantive comments regarding the Strategic Direction and earnestly looks forward to working with Indian Country as it begins implementation.</p>
<p>“We would like to point out that the prevalent, consistent use of “if/then” statements under each strategy of the strategic plan implies many of these goals have no solid commitment from relevant leaders. The plan needs to go beyond an aspirational mode and be assertive in its language.” [Education Association].</p>	<p>The BIE’s reasoning for utilizing “if” statements in the Draft Strategic Plan Proposal was to ensure that Tribal leaders and stakeholder understood that, as presented, the document was subject to change in light of input received through the consultation process. As originally intended, the Strategic Direction replaces all “if” statements with “when” action-oriented statements.</p>
<p>“Finally we would like to propose community schools as a model that would support all the mission areas in the strategic plan...We need a research-based solution like community schooling with a proven track record to help students overcome obstacles to success in school districts across the nation facing high poverty and low student achievement....For example the community schools in the Union Public Schools, a district in Tulsa Okla. could be an outstanding model for BIE schools.” [Education Association].</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making.</p>

<p>“Under Secretarial Order No. 3334, published June 12, 2014, the BIE must restructure its Education Line Offices (ELOs) and rename them Education Resource Centers (ERCs)...ELOs are a crucial part of the BIE's system of educating young, native students. The Tribe is concerned that the BIE will be unable to provide improved technical assistance and comprehensive educational services to the Tribe and its school 150 miles away. The Tribe believes that an ERC should be located closer to the Tribe...[t]he Draft Strategic Plan does not contain any discussion of ELOs or ERCs.” [Tribal Leader].</p>	<p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>
<p>“The Draft Strategic Plan is far too general. It is only nine pages, the BIE lays out very broad-brush visions and goals. In order to ensure that the BIE can fully benefit from this expertise, the BIE must provide the Tribe with a detailed plan, not just broad-brush concepts. The Tribe would appreciate an opportunity to review and comment on a fleshed-out draft strategic plan ("a second draft") before the BIE releases a final Strategic Plan. Additionally, as written, the Draft Strategic Plan allows the BIE to escape any accountability because there are no specific goals which could be used to hold the BIE accountable for future failures or deficiencies.” [Tribal Leader].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau’s data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction’s implementation.</p> <p>BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p> <p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year’s progress and: 1 adjust planned milestones for</p>

	<p>the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>“Schools, in collaboration with community partners (community-based organizations, parent and caregiver groups, tribal organizations, etc.) should be the main agencies tasked with developing policies, procedures and programs that provide the knowledge, skills and modeling behaviors necessary for physical, mental and emotional well-being of students.” [Education Organization].</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making.</p>
<p>“We must emphasize the role of organized labor as a partner in pursuing a CTE plan...partnership idea could lead to a successful grow-your-own approach for developing students into highly qualified, well-prepared employees ready to work in areas needed by the various federal agencies, such as teaching, accounting, finance, land management, land preservation, real estate, gaming hospitality, business management and other positions where it has been difficult to find qualified Native job candidates.” [Educational Organization].</p>	<p>The BIE recognizes transparent communication with its stakeholders is critical to its success. As such, the BIE will implement strategy 6.3 in order to facilitate the multilateral communication of professional feedback.</p>
<p>“Accountability and transparency in decision-making and communications; building collaboration with organizations as well as with community partners; using data and scientific research to drive decisions and creating a support system for employees are imperative. However, the processes described in the plan are not clear about taking into consideration the feedback or input of all stakeholders involved.” [Educational Organization].</p>	<p>The BIE recognizes transparent communication with its stakeholders is critical to its success. As such, the BIE will implement strategy 6.3 in order to facilitate the multilateral communication of professional feedback.</p> <p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau’s data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction’s implementation.</p> <p>BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the</p>

	<p>implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p> <p>BIE will provide Tribes, school boards, employees and other stakeholders a mid-cycle status update during Year Three of the implementation phase of the Strategic Direction. As part of its effort to execute mid- and long-term goals and strategies, the BIE will implement milestones and actions for Year One, with progress tracked and transparently reported through strategic performance management. In addition, the BIE will utilize feedback from Tribal consultation in the implementation, tracking and reporting of milestones and actions for Year Two. Before July 1 of each year the BIE will evaluate its previous year's progress and: 1 adjust planned milestones for the upcoming year, as necessary; 2 identify necessary additional actions to complete milestones; and 3 establish subsequent yearly milestones to support and expand existing work and identify new initiatives where necessary.</p>
<p>"It is not apparent from this plan what the process will be for consistent evaluation of these goals and strategies. We recommend identifying measurable objectives that would be evaluated periodically, and the participation of all stakeholders involved in supporting these goals and strategies..." [Educational Organization].</p>	<p>BIE is committed to becoming a data driven decision making organization. Strategy 6.2 and its accompanying milestones identify the concrete path forward towards improving the Bureau's data management. As work matures regarding data the cross-collaborative BIE team assigned to Strategy 6.2 will identify specific metrics regarding the effectiveness of the Strategic Direction's implementation.</p> <p>BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or to address noted challenges in a timely manner, keeping the implementation process on track. Through the use of progress data, staff will be more responsive to the needs of students and Tribal communities.</p>
<p>"...propose community schools as a model that would support all the mission areas in this strategic plan. BIE schools, not unlike many public schools, continue to wrestle with low student achievement; punitive, ineffective ways to address discipline and safety issues; a lack of social, emotional and healthcare services; staff</p>	<p>The BIE is committed to working with schools at the local level through its Education Resource Centers and Associate Deputy Director Offices, including appropriate local level decision-making.</p>

<p>turnover and poor morale; retaliation against whistleblowers; opaque rather than transparent decision-making; and a lack of true accountability.” [Educational Organization].</p>	
<p>“Organizational restructuring should have as a fundamental goal the facilitation of clear, open communication that enables organizational learning and clarifies accountability for results...opportunity for the Bureau of Indian Education to decentralize administrative services from Washington D.C. to the central U.S. and create savings through decreased locality pay, per diem rates, travel and other business-related costs. The process of decentralization can substantially improve efficiency, transparency, accountability, and responsiveness of service provision compared with centralized systems. The decentralized education provision promises to be more efficient, better reflect local priorities, encourage participation, and, eventually, improve coverage and quality and programs with fiscal constraints are enticed by the potential of decentralization to increase efficiency.” [Tribal Leader].</p>	<p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>
<p>“Structure. As we move forward, the BIE has a unique opportunity to demonstrate effectiveness and relevance to the Native American people of the South and Eastern United States by not only preserving, but supporting the expansion of the BIE-Oklahoma Area Education Office in Oklahoma City, Oklahoma to serve as a senior management level office providing administrative support services and technical assistance for a broad service area of the BIE in the United States...[a]ny realignment proposal should include strategic changes that build capacity to better support programs and strengthen how BIE delivers education to students through a new organizational structure that: improves service by meeting the comprehensive and diverse needs of federally operated schools and tribally operated grant school; places resources and support services closer to schools; clearly defines responsibilities to provide expert support services; assists in building the capacity of tribal nations to operate programs; establishes a cost-saving structure through staff locations (locality pay), travel costs and office/facilities lease and/or rental by partnering with one or more of the 38 federally recognized tribal nations located in Oklahoma; aid in the delivery and efficiency of administrative services across American Indian and Alaska Native communities through enhanced logistics. [Tribal Leader].</p>	<p>The BIE structural reorganization is beyond the scope of the Strategic Direction and its associated consultation sessions. The Strategic Direction focuses on the work of the Agency regardless of how the Agency is structurally organized. Nonetheless, the BIE recognizes that strong collaboration will be needed across the Agency, as well as with our Tribal partners, in order to successfully achieve the Vision of the Strategic Direction.</p>

<p>"...supports the strategic planning, realignment and streamlining efforts, provided they honor previous commitments to positive and significant opportunities for the Bureau of Indian Education (BIE) and Bureau of Indian Affairs (BIA) to find pragmatic, progressive and sustainable solutions to provide adequate resources and policy proposals that will improve education opportunities for Native Americans." [Tribal Leader].</p>	<p>BIE appreciates your timely review and substantive comments regarding the Strategic Direction and earnestly looks forward to working with Indian Country as it works to implement the Direction.</p>
<p>"Collaboration and Blueprint for Reform. Where is the alignment between the proposed Strategic Plan with the current BIE Blueprint for Reform?" [Tribal Leader].</p>	<p>In light of consultation comments received, the BIE added a robust introductory section between pages i and 13 of the Strategic Direction, which includes specific references the ongoing Reform. Additionally, the BIE has worked to ensure that the Reform is embedded into its Goals, Strategies, Milestones and Actions.</p>
<p>"Addressing Rumors of State Takeover. Unfortunately, we have heard rumors that some officials are considering transferring BIE funding and responsibilities to states. I hope these are horribly uninformed rumors that should not be taken seriously. However, if there is any consideration of any limited transfer of responsibilities to states, I am here to strongly oppose such a transfer that will undermine the federal trust responsibility. Furthermore, such a transfer would undermine the government-to-government relationship that the Navajo Nation has with the federal government." [Tribal Leader].</p>	<p>This issue is outside the scope of the BIE Strategic Plan consultation. However, as stated during the Southwest consultation session, the BIE is unaware of any plans to transfer any funds or responsibilities to states.</p>
<p>"Mission (pg): Too long, condense." [School Board Representative].</p>	<p>The Mission of the BIE is defined by federal regulation, located at 25 C.F.R. 32.3. The Mission Statement contained in the Strategic Plan is a condensed version of the regulatory mission which makes no substantive changes. BIE cannot use the strategic planning process to make substantive changes to its pre-defined Mission.</p>
<p>"1b. Sustaining implementation practices despite staff turnover at both macro and micro levels within departmental-agency hierarchies (Goal 3: Strategy 3.1). [Education Organization]."</p>	<p>BIE staff at all levels of the organization, and across all divisions, will work in integrated teams to implement the Strategic Direction. Working in such a collaborative manner will overcome traditional silos and create a strong learning environment responsive to the needs of its students. Each team will report monthly regarding progress on actions. BIE senior leaders will use the data from monthly progress reports to make informed adjustments and/or</p>

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