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Havasupai Elementary School Annual Report

FEBRUARY 11, 2025

Background and Overview

In 2023, the Bureau of Indian Education entered a settlement agreement with Plaintiffs in *Stephen C., et al. v. Bureau of Indian Education, et al.*, No. 3:17-cv-08004-SPL (D. Ariz.). The Settlement Agreement resolves claims concerning BIE's compliance with 13 regulations at Havasupai Elementary School (HES). The thirteen regulations cited in the Settlement are found at [25 C.F.R Part 36](#) Minimum Academic Standards for the Basic Education of Indian Children and National Criteria for Dormitory Situations. The specific regulations subject to this Settlement Agreement include 25 C.F.R. §§ 36.11, 36.20, 36.21, 36.22, 36.23, 36.30, 36.31, 36.40, 36.41, 36.42, 36.43, 36.50, and 36.51.

Under Section B of the Settlement Agreement, DOI, BIE was tasked with creating a Compliance Specialist position responsible for overseeing the implementation of compliance measures at HES (Section B-1). Additionally, the Compliance Specialist must issue an initial compliance assessment within three months of assuming the position (Section B-2). This initial assessment was completed on February 12, 2024, and is available [here](#).

According to Section B-2-b, the Compliance Specialist must draft a written work plan outlining how HES would meet the 13 regulations within thirty days following the initial assessment. The initial work plan was completed by March 13, 2024, with continuous updates posted online every 90 days. The first work plan was released on April 12, 2024, followed by updates on July 11, 2024, October 9, 2024, and January 7, 2025.

Per Section B-2-c of the Settlement Agreement, beginning one year from the initial assessment date, the Compliance Specialist will issue an annual report on the status of BIE's compliance with the 13 regulations. The draft of this report is due by February 12, 2025, with the final report expected to be posted online by March 13, 2025.

Havasupai Elementary School Annual Report

Since the initial assessment in February 2024, Havasupai Elementary School has established and enhanced systems, routines, and procedures to achieve and maintain regulatory compliance. Despite challenges encountered at the beginning of the 2024-2025 school year, the school has consistently demonstrated a commitment to meeting the needs of its students, staff, and community.

This annual report details the school's progress since the initial assessment in February 2024. It aims to foster transparency and accountability by highlighting compliance statuses, actions taken, challenges faced, and recommendations for continued improvements. Data for this report and assessment of compliance with the 13 identified regulations was collected through the activities outlined below between February 2024 to February 2025.

Activities Completed by the Compliance Specialist

To prepare the annual report, the Compliance Specialist completed the following activities:

1. **Review of Regulations:** Conducted a thorough review of each of the 13 regulations to identify necessary data points and evidence for determining compliance.
2. **Site Visits:** Completed six site visits to HES to support the school and gather relevant data during the following weeks: February 11, 2024; March 17, 2024; August 7, 2024; October 8, 2024; December 9, 2024; and January 6, 2025.
3. **In-Person Support:** Provided additional support to school leadership through meetings and training sessions during the following weeks: May 5, 2024; June 21, 2024; and September 7, 2024.
4. **Classroom Walkthroughs:** Conducted classroom visits and facilitated discussions with teachers regarding compliance measures.
5. **Regular Meetings:** Held weekly meetings with the school principal to assess progress and offer ongoing guidance.

6. **Community Engagement:** Collaborated to organize a community meeting to provide an overview of compliance efforts and gather feedback from community members and stakeholders. Attended a Tribal council meeting to give an overview of the compliance specialist role and work.
7. **Document Review:** Reviewed various documentation, including curriculum materials, lesson plans, classroom management plans, school handbooks, enrollment documents, NASIS reports, SharePoint school documents, trackers, teacher credentials, ISEP review data, and schedules.
8. **Collaborative Consultation:** Participated in biweekly meetings with the Western Educational Equity Assistance Center at WestEd consultant to enhance compliance strategies and efforts.

These comprehensive activities have been essential in ensuring HES remains focused on compliance while fostering an engaging educational environment for students and all stakeholders.

Compliance Status

The overall compliance rate for Havasupai Elementary School has improved. The 13 regulations consist of 101 specific regulatory requirements. Of these, 20 were found to be compliant, 71 were non-compliant, and 10 were deemed not applicable. For many of the 71 non-compliant requirements, the school has taken actions toward compliance in alignment with the written work plan, as detailed in the information below. Additionally, this report outlined challenges and setbacks encountered, and recommendations to inform the next written work plan.

Areas of Growth: Compliance rate improvements were observed in three of the 13 regulations:

- **25 CFR 36.11 - Administrative Requirements:**
 - Compliance improved through effective maintenance of student-to-staff ratios and updates to enrollment and attendance policies.
- **25 CFR 36.41 - Textbooks:**
 - Compliance growth was achieved by creating an inventory of textbooks and instructional materials.
- **25 CFR 36.42 - Counseling:**
 - Increased compliance was facilitated by implementing the BIE Assessment for end-of-year school-wide summative assessments and sharing testing data with stakeholders.

Based upon the direct observation of the Compliance Specialist and a review of administrative procedures, HES has strengthened the following areas since the initial assessment:

1. **School-Wide Routines and Procedures:** The implementation of school-wide routines and behavior expectations has significantly improved the overall school atmosphere. Clear procedures provide consistency, reduce anxiety, and foster a more conducive learning environment.
2. **Administrative Efficiency and Record Keeping:** Enhancements in administrative tasks and record keeping have been achieved through improved attendance tracking practices and the effective use of the SharePoint site. Streamlined procedures have led to accurate data management and better communication within the school.
3. **Safety and Facility Improvements:** Significant enhancements have been implemented to bolster campus safety at Havasupai Elementary School. Key improvements include the repair of the perimeter fence, which strengthens security, and consistent efforts to maintain a clean and welcoming campus. Additionally, the sidewalks and walkways have been creatively painted with Havasupai language hopscotch, a large multiplication table, and a protractor, infusing cultural relevance and educational value into the environment. To further ensure safety, the front entrance remains closed at all times, providing an added layer of security for students and staff. Over the

past year, the school has undertaken numerous repairs and beautification projects, all aimed at creating a safe, engaging, and aesthetically pleasing educational environment for everyone.

Identified Areas for Improvement

Upon assessing compliance with the 13 regulations, several needs were identified. Among the overarching challenges impacting compliance—including staff housing, the need for additional instructional classrooms, and teacher recruitment and retention—three urgent areas for improvement emerged and should be prioritized:

1. **Instructional Leadership:** Strong instructional leadership is crucial for fostering an effective learning environment at HES. Improvements in this area include:
 - Supporting teachers to implement curricula that align with BIE standards and incorporate culturally relevant content.
 - Focus on developing structured lesson plans that incorporate best practices, ensuring clarity of objectives, differentiation for diverse learners, and assessments aligned with state standards.
 - Utilizing data to guide teaching practices and identify student improvement areas.
 - Conducting regular classroom observations and providing actionable feedback.
 - Establishing a clear vision for instructional goals and enhancing communication among staff.
 - Create procedural documents and a structured documentation system to track the submission of teacher lesson plans. Additionally, this data could be utilized to provide performance feedback, promoting accountability and continuous improvement within the educational framework.
2. **Tribal and Community Involvement:** Strengthening engagement with the Havasupai Tribe and the wider community is vital for creating a supportive educational atmosphere. Areas to focus on include:
 - Collaborating with tribal leaders to ensure curriculum relevance and promote student engagement.
 - Actively involving parents and community members in school initiatives to foster a sense of ownership.
 - Leveraging community resources to enhance student learning experiences.
 - Involving tribal leaders and community members in decision-making processes to prioritize community values.
3. **Student Non-Academic Needs:** Addressing the non-academic needs of students is essential for their overall development and success. Key areas for improvement include:
 - Transition support: Establishing a transition support program to prepare students for high school, which may include progress trackers and small group sessions with a counselor to provide personalized support.
 - Extracurricular activities: Developing a diverse activity program tailored to student interests and needs, promoting engagement and growth through relevant extracurricular opportunities.
 - Student leadership opportunities: Creating more avenues for student leadership to empower students and foster confidence, helping them develop essential skills and a sense of responsibility.
 - Increased counseling time: Creating more time for individual and group counseling sessions to address personal issues students may face and equip them with valuable tools and coping strategies.

Conclusion

In conclusion, Havasupai Elementary School has made progress in numerous areas. Addressing identified needs in instructional leadership, community engagement, and student needs will be essential for continued growth. The school continues to demonstrate commitment to fostering a nurturing educational environment that meets the diverse needs of its students and the broader community. Moving forward, HES should prioritize these areas to enhance compliance and optimize educational outcomes for all of its students.

Submitted by:

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February 11, 2025

HES Annual Report Timeline 2025

TIMELINE	ACTIVITY	RESPONSIBILITY
February 12, 2025	Issue annual report on the status of BIE's compliance with 13 regulations at issue	Compliance Specialist, BIE
February 18, 2025	Copy of annual report provided to Assistant Secretary-Indian Affairs and BIE Director	Compliance Specialist, BIE and Management Analyst, BIE
February 24, 2025	Copy of annual report provided to Facilitator, Plaintiffs, and Tribal Council.	Compliance Specialist, BIE; Solicitor, BIE; and Education Program Administrator, BIE
March 14, 2025	Post annual report at Havasupai Elementary School Bureau of Indian Education (bie.edu)	Compliance Specialist, BIE, and Communications Director, BIE

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25 CFR §36.11 Standard II - Administrative Requirements

25 CFR § 36.11, Standard II for Administrative Requirements falls under Subpart B - Educational Management. There are seven core requirements outlined in § 36.11.

During this assessment, it was determined that 2 out of 7 requirements are compliant, 2 out of 7 are non-compliant, and 3 out of 7 are not applicable. For the applicable requirements, HES has achieved a 50% compliance rate for §36.11. This marks an improvement from the initial assessment, which indicated a zero percent compliance rate for this regulation.

Legal Citation: 25 CFR §36.11(a)(1)

Staffing. Each school shall, at a minimum, meet the following requirements:

The overall school ratio of regular program students to regular program teachers in self-contained classrooms shall not exceed the following except under the conditions set forth in paragraphs (a)(4) (i) and (ii) of this section. Average daily membership (ADM) shall be used in meeting the following ratios.

Level	Ratio
Kindergarten	20:1
1 st grade-3 rd grade	22:1
4 th grade-high school	25:1

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This finding is noted as not applicable at the time of the annual report, as HES has not operated with self-contained classrooms during the 2024-2025 school year. Currently, all HES classes are structured as multi-grade classrooms. This requirement will be monitored and re-assessed if HES decides to establish self-contained classrooms in the future.

Legal Citation: 25 CFR §36.11(a)(2)

Multi-grade classrooms that cross grade-level boundaries (e.g., K-1, 3-4, etc.) shall use the maximum of the lower grade. In grades K-8, grades shall be consolidated to meet the teacher ratios listed above.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES has met this requirement because they have consistently been below the Ratios for their multi-grade classrooms since March of 2024 as evidenced by classroom walkthroughs, NASIS register report, and teacher attendance books.

Current class sizes are as follows:

Kindergarten/1st	13 (K-7, 1 st -6)
1 st /2 nd	12 (1 st - 6, 2 nd - 6)
3 rd /4 th	17 (3 rd - 9, 4 th - 8)
5 th /6 th	13 (5 th - 5, 6 th - 8)
7 th /8 th	13 (7 th -5, 8 th -8)

Legal Citation: 25 CFR §36.11(a)(3): - The daily teaching load per teacher in departmentalized classes shall not exceed 150 students (ADM) except in activity type classes such as music and physical education.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This is not applicable because HES does not offer departmentalized classes; the HES student population is less than 150.

Legal Citation: 25 CFR §36.11(a)(4) - Schools exceeding these specific staffing ratios for over 30 consecutive days during one school year shall submit a justification for a request for a waiver to the Director, through the Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, which may be approved for a period not to exceed one school year and for the following reasons:

- (i) Additional classroom space is not available for establishing another class; or
- (ii) The school, Agency, Area and Office of Indian Education Programs Applicant Supply File has been exhausted and the required teacher position cannot be filled. However, efforts to fill the vacancy shall be continued.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This is not applicable because HES has complied with regulation §36.11(a)(2) for the 2024-2025 School Year. HES did submit a request for a waiver for the 2023-2024 school year on May 15, 2024.

Legal Citation: 25 CFR §36.11(a)(5) - Each school shall provide, in the absence of a regular teacher, a certified substitute teacher who meets the State substitute teacher qualifications. In the event that such a substitute is not available, coverage will be provided by a school employee designated by the school supervisor. A class cannot have as a teacher an employee without teaching credentials for more than 20 school days during any one school year.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as non-compliant with this regulation due to the following reasons:

- The school counselor was assigned to teach the 3rd-4th grade classroom from September 3rd through December 20th. She does not possess teaching credentials, and this assignment exceeded the 20-day limit stipulated in the regulation.

Additionally, a school paraprofessional without teaching credentials is assigned to the kindergarten class from September 13th until the position is filled. This assignment also exceeds the 20-day requirement outlined in the regulation.

Actions Taken	The principal has implemented a substitute tracker that is regularly updated to monitor coverage for classes. Currently, two certified teachers have been assigned to the 3rd-4th grade classroom, with their positions commencing on December 2, 2024, and January 12, 2025.
Challenges Faced	HES has actively advertised for a local certified substitute teacher but has only received one application to date. Unfortunately, this applicant did not meet the closing deadline and did not reapply when the position reopened.
Recommendations	<ol style="list-style-type: none"> 1) Ensure that the recruitment of certified substitute teachers is a strategic component of the school’s recruitment and retention plan. This can help prioritize the filling of substitute positions and ensure compliance with the regulation. 2) Work closely with the community to engage and support tribal community members in the application process. This includes: <ul style="list-style-type: none"> • Providing information on educational requirements for the position. • Offering resources or support to help applicants meet state certification requirements. • Creating outreach programs that encourage local community members to consider becoming certified substitute teachers.

Legal Citation: 25 CFR §36.11(b):

(b) Written school enrollment and attendance policies. Each school shall have written school enrollment and attendance policies in compliance with and/or consistent with 25 CFR 31, Federal Schools for Indians, the statutes of the State, and tribal education ordinances.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES has a written enrollment policy outlined on pages 16-17 of the Policies and Procedures manual for students. Additionally, there is a written attendance policy on pages 18-21 of the same manual, as well as an attendance policy included in the staff handbook. HES has established protocols and is currently implementing these policies.

Legal Citation: 25 CFR §36.11(c)

(c) Immunization. School children shall be immunized in accordance with the regulations and requirements of the state in which they attend school or standards of the Indian Health Service.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as non-compliant with this regulation for the following reasons:

- While HES collects and uploads a copy of each student’s immunization record to the Native American Student Information System (NASIS) during student registration, there is no established system to monitor whether these immunizations meet the requirements outlined by the state or the Indian Health Service (IHS).
- During the 2024 Fall ISEP review, although all but a few students had documented immunizations, the school is still actively working to obtain the required immunization records for these students. The absence of a monitoring system compromises HES’s ability to ensure comprehensive compliance with the immunization requirements.

Actions Taken	HES partnered with the Indian Health Service (IHS) to conduct health screenings at the school, including an immunization review on September 10th and 11th, 2024. This partnership represents a proactive step towards improving student health and compliance with immunization requirements.
Challenges Faced	The school was unable to verify the results of the immunization screening conducted by IHS because the results were not shared with HES. This lack of communication limits the school’s ability to assess the compliance status effectively. Currently, there is no systematic approach at HES to ensure that immunizations are up to date according to state regulations or IHS standards.
Recommendations	<ol style="list-style-type: none">1) Review and potentially revise the current interagency agreement with IHS to include monitoring of immunization records. This expanded agreement should ensure that:<ul style="list-style-type: none">• IHS works closely with HES to notify parents and guardians when immunization records do not meet state or IHS requirements.• The agreement includes a structured plan for sharing immunization screening results with the school to enhance compliance tracking.2) Utilize a school nurse from another Bureau of Indian Education (BIE) school to support immunization monitoring efforts. Responsibilities of the school nurse should include:<ul style="list-style-type: none">• Reviewing and tracking student immunization records to ensure compliance with regulations.• Addressing other health-related needs within the school, thereby improving overall student health outcomes.• Establishing a regular reporting system to keep parents informed about their child’s immunization status and any outstanding requirements.

25 CFR §36.20 Standard V - Minimum Academic Programs/ School Calendar

25 CFR § 36.20, Standard V for Minimum Academic Programs/ School Calendar falls under Subpart C - Minimum Program of Instruction. There are seven core requirements under § 36.20.

During this assessment, it was determined that 2 out of 7 requirements are compliant, and 5 out of 7 are non-compliant. For the applicable requirements, HES has achieved a 28.57% compliance rate for § 36.11. This compliance rate is unchanged from the initial assessment, which also indicated a 28.57% compliance rate for this regulation.

Legal Citation: 25 CFR §36.20(a)

If an emergency arises from an uncontrollable circumstance during the school day which results in the dismissal of students by the school administration, the day may be counted as a school day provided that three-fourths of the instructional hours are met.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as compliant with this regulation for the following reasons:

Established Procedures for Emergency Closures: HES has met the requirement for this regulation because there is a calendar and established procedures for closing schools in the event of an emergency. Furthermore, NASIS is utilized to track school days, instructional minutes, and days of attendance, ensuring that records reflect compliance with instructional hour requirements.

Legal Citation: 25 CFR §36.20(b): The educational program shall include multi-culture and multi-ethnic dimensions designed to enable students to function effectively in a pluralistic society.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

Lack of Multi-Cultural and Multi-Ethnic Integration in the Curriculum: HES is rated as non-compliant due to the absence of clear expectations or plans for incorporating multi-cultural and multi-ethnic dimensions into the educational program. Although some elements of this perspective may be included in the selected curriculum, there are insufficient lesson plans to adequately demonstrate the effective implementation of these components.

Actions Taken	A training session focused on Native language preservation is scheduled for February 28, 2025, conducted by Sundance. This initiative is a step towards enriching the cultural content within the curriculum but does not fully address the multi-cultural and multi-ethnic educational requirements.
Challenges Faced	<p>Lack of Resources and Guidance: Teachers currently lack accessible resources and guidance on how to effectively incorporate multi-cultural and multi-ethnic dimensions into their instruction.</p> <p>Leadership Training Needs: There is a notable need for school leadership to receive training on effectively analyzing existing systems and implementing necessary changes to facilitate a more inclusive educational program.</p>
Recommendations	<ol style="list-style-type: none"> 1) Collaborate with educators, cultural experts, and community members to identify key cultural themes and topics that should be integrated into the curriculum. 2) Establish specific learning objectives and outcomes that reflect multicultural education principles. 3) Develop a resource guide for teachers that includes lesson plans, instructional materials, and references for multi-cultural education. Ensure that resources are culturally relevant and aligned with the educational standards.

Legal Citation: 25 CFR §36.20(b)(1): The school's language arts program shall assess the English and native language abilities of its students and provide instruction that teaches and/or maintains both the English and the primary native language of the school population. Programs shall meet local tribal approval.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as non-compliant with this regulation for the following reasons:

- While the school effectively assesses and provides instruction in English through various means, such as classroom instruction, i-Ready, and BIE assessments (including Pearson-Interim assessments), there is currently no data tracking system in place to monitor the assessments conducted within the Language and Culture program.
- Although the program has been submitted for tribal approval and received approval from the Tribal Council on January 29, 2025, there is a lack of documented assessments or evidence of student growth in the native language instruction.

Actions Taken	HES has adopted all BIE assessments for English, including the End of Year assessment and Interim Assessments. The also school utilizes i-Ready to monitor student growth in English. A contract has been established with Sundance to collaborate with the culture and language teacher in developing the culture and language curriculum.
Challenges Faced	The absence of a systematic approach to tracking data or assessments administered in the culture and language classes is a significant barrier. While the curriculum for the culture and language program has received tribal approval, the lack of evidence regarding assessments conducted means that student progress in the native language cannot be effectively monitored or addressed.
Recommendations	<ol style="list-style-type: none"> 1) Invest in professional development opportunities that focus on assessment practices specifically related to native language instruction. This training should include: <ul style="list-style-type: none"> • Best practices for designing and implementing formative and summative assessments that are culturally relevant. • Methodologies for effectively tracking and analyzing student performance and growth in both English and the native language.

Legal Citation: 25 CFR §36.20(b)(2): The school program shall include aspects of the native culture in *all* curriculum areas. Content shall meet local tribal approval.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

Insufficient Integration of Native Culture Across Curriculum Areas: HES is rated as non-compliant due to the lack of established expectations, plans, or identified resources to effectively integrate native culture across all curriculum areas. Although native culture is offered on a rotational basis for 45 minutes each day from Monday to Thursday, this instruction does not effectively connect or collaborate with classroom instruction in other subjects. While some teachers may incorporate aspects of Supai or Native culture into their lessons, these efforts are inconsistent and not formally expected or documented in lesson plans.

Actions Taken	A training session on Native language preservation is scheduled for February 28, 2024, conducted by Sundance. This initiative aims to enhance cultural awareness and education. The school has initiated efforts to incorporate the Havasupai language into the school environment, for example, by including a hopscotch game featuring numbers in the Havasupai language.
Challenges Faced	<p>Limited Collaboration Time: The language and culture teacher has a limited presence on campus, allocated only 45 minutes per day for instruction, which limits the ability to collaborate effectively with other subject teachers.</p> <p>Need for Resources and Training: There is a significant lack of resources, consultation opportunities, and training with cultural experts to support teachers in integrating native culture into their lessons.</p> <p>Absence of Established Expectations: Without clear standards or expectations, teachers are not documenting lessons that incorporate Native culture into their curriculum, resulting in inconsistent educational experiences for students.</p>
Recommendations	<ol style="list-style-type: none"> 1) Work with the language and culture teacher over the summer to develop resources and lesson plans that support the effective implementation of native culture across all subject areas. 2) Collaborate with the ADD BOS Culture and Language Specialist to create a toolkit for teachers that provides guidelines, activities, and materials aligned with Native culture. 3) Collaborate with the Facilitator to identify local community resources that can be integrated into the curriculum. After developing the materials and content, seek approval from the tribe to ensure cultural accuracy and relevance. 4) Offer professional development sessions for teachers focused on culturally inclusive instruction and available cultural resources. 5) Establish clear expectations for teachers to develop and document lesson plans that incorporate native culture effectively. 6) Aim to enrich the school environment by displaying the Havasupai language throughout the campus. Examples include: <ul style="list-style-type: none"> • Labeling restrooms, colors, and numbers in classrooms with Havasupai vocabulary.

- Creating signs in the Havasupai language for various campus areas, fostering a culturally immersive environment for students.

Legal Citation: 25 CFR §36.20(b)(3): The school program shall assess the learning styles of its students and provide instruction based upon that assessment. The method for assessing learning styles shall be determined at the local level.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as non-compliant with this regulation due to the following reasons:

- **Absence of Learning Style Assessment System:** HES has not yet implemented a system to assess the learning styles of its students, which is necessary to provide instruction based on those assessments.
- **Training Conducted but Insufficient:** While HES conducted training on January 10, 2024, focusing on Learning Styles and introduced the VARK learning styles assessment, challenges remain regarding the suitability of assessments for all grade levels.
- **Inappropriateness of Current Assessment Tools:** The VARK assessment is suggested for children aged 12 and older, raising concerns about its appropriateness for younger students, thereby necessitating a search for alternative assessments that are universally applicable across different age groups.

Actions Taken	HES conducted training on January 10, 2024, that focused on Learning Styles and introduced the VARK learning styles assessment as a possible tool for use in classrooms.
Challenges Faced	The school has encountered difficulties in identifying a learning style assessment suitable for all grade levels, particularly one that can automatically compile data on student learning styles. The VARK assessment is suggested for children aged 12 and older, raising concerns about its appropriateness for younger students, thereby necessitating a search for alternative assessments that are universally applicable across different age groups.
Recommendations	<ol style="list-style-type: none"> 1) Identify a range of culturally responsive and age-appropriate learning style assessment tools for teachers to select from and administer. 2) Establish a system for teachers to compile and maintain data on student learning styles in a dedicated data binder, facilitating easy access to this information for instructional planning. 3) Incorporate dedicated time into the school schedule for local Professional Learning Communities (PLCs). During these PLCs, teachers can: <ul style="list-style-type: none"> • Analyze the collected data on learning styles collaboratively. • Plan and design instruction based on the insights gained from their analysis, ensuring that instruction is tailored to meet the diverse needs of students. 4) Develop a lesson plan template that includes sections for documenting the learning modalities accessed during each lesson. This will: <ul style="list-style-type: none"> • Encourage teachers to reflect on the effectiveness of their instructional strategies. • Facilitate better tracking of how well different learning styles are being accommodated in classroom instruction.

Legal Citation: 25 CFR §36.20(b)(4): The school program shall provide for at least one field trip per child per year to broaden social and academic experiences.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is compliant with this regulation, as all students were provided with a field trip opportunity as part of their culture class. The field trip focused on the significant role that water plays in Havasupai culture, enhancing students’ social and academic experiences through real-world learning.

Field Trip Details

- **Field Trip Dates:**
 - **7th/8th Grade:** October 15
 - **Kindergarten/1st Grade:** October 16
 - **1st/2nd Grade:** October 17
 - **3rd/4th Grade:** October 21
 - **5th/6th Grade:** October 22

Each class participated on separate dates, ensuring that every child engaged in this enriching experience.

Legal Citation: 25 CFR §36.20(c): All intraschool programs (e.g., library, instructional labs, physical education, music, etc.) which are directly related to or affect student instruction shall provide services from the beginning of the school term through the final class period at the close of the school term.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is rated as non-compliant with this regulation due to the inability to provide all intraschool programs consistently from the beginning of the school year through to the end. While the school started with offerings in Physical Education (PE), Library, and Native Language and Culture, several issues affected the continuity of these programs:

- The library services were discontinued earlier in the year following the resignation of the contractor.
- PE was available from the beginning of the school year until December 2024; however, the contracted PE teacher resigned at the end of December 2024.
- There have been ongoing staffing shortages and no available housing for the required staff to support all intraschool programs.

Despite these challenges, HES has consistently provided Native Language and Culture classes to all students.

Actions Taken	HES established monthly contract meetings beginning October 3, 2024, to track and review all open and pending contracts for staffing in intraschool programs. The PE and librarian positions have been posted, aiming to permanently hire Bureau of Indian Education (BIE) staff for these roles. While candidates received tentative job offers, these were rescinded due to a federal hiring freeze.
Challenges Faced	Staffing Shortages: Resignations and the inability to hire staff due to the federal hiring freeze have severely impacted program delivery. Space Limitations: The school lacks adequate facilities, such as modular buildings or additional classrooms, to accommodate all intraschool programs, which limits the range of services that can be offered.
Recommendations	<ol style="list-style-type: none"> 1) Develop contingency plans to ensure continuity of services for all intraschool programs in the event of staff turnover. This may include: <ul style="list-style-type: none"> • Recruiting temporary or substitute staff to fill gaps temporarily. • Creating partnerships with local colleges or universities to provide student teachers or interns who can assist in running programs virtually. 2) Explore the potential for remote learning programs or virtual classes that can temporarily fill gaps in areas where in-person instruction is not available. This could be particularly useful for subjects like Library and certain Arts programs during transitional periods. 3) Collaborate with local community members to identify volunteers or resources that can temporarily support intraschool programs, reducing reliance on contracted staff. This can include: <ul style="list-style-type: none"> • Enlisting retired educators, community leaders, or tribal members to assist in delivering programs on a short-term basis.

25 CFR §36.21 Standard VI - Kindergarten Instructional Program

25 CFR §36.21, Standard VI - Kindergarten Instructional Program, falls under Subpart C - Minimum Program of Instruction. Six core requirements were assessed under §36.21.

During this assessment, it was determined that 0 out of 6 requirements are met, resulting in 6 out of 6 requirements being non-compliant. For the applicable requirements, HES has achieved a 0% compliance rate for §36.21. This marks a decline from the 2024 initial assessment, which indicated that HES had a compliance rate of 28.57% for this regulation.

Legal Citation: 25 CFR §36.21(a) - The curriculum for kindergarten shall provide children with experiences which emphasize language development, native language where necessary as determined by 25 CFR 39.11(g), and performance of the requirements in paragraph (b) of this section. Such programs shall assist children in developing positive feelings toward themselves and others.

Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for several key reasons:

- **Curriculum Implementation:** While HES uses the SAVVAS curriculum for kindergarten, which emphasizes language development, there are significant gaps in documentation and lesson planning.
- **Native Language Instruction:** Although Native language and culture are provided for 45 minutes every fifth full school day, there is no evidence of consistent lesson plans or documentation to demonstrate compliance with the required regulations.
- **Social-Emotional Learning (SEL):** The addition of a school counselor who provides SEL lessons for all students is a positive step towards helping students develop positive feelings toward themselves and others. However, the impact of this may not be fully integrated into the kindergarten curriculum due to a lack of structured, consistent lesson documentation and SEL classes starting in December 2024.

Actions Taken	HES contracted with Sundance Educational Consulting to create a Native Culture and Language program guide. The school also purchased the Character Counts program to be utilized During SEL lessons.
Challenges Faced	The previous school counselor’s assignment to teach in a 3rd/4th grade classroom for the first half of the school year delayed the initiation of SEL classes, leading to a gap in social-emotional instruction until December 2024.
Recommendations	<ol style="list-style-type: none"> 1) Require the development of comprehensive lesson plans for both long-term substitutes and permanent staff in the kindergarten program. Provide support and resources, such as: <ul style="list-style-type: none"> ○ Templates for lesson planning. ○ Professional development sessions focused on curriculum alignment and effective lesson delivery. 2) Develop a straightforward lesson planning template specifically for the Native Culture and Language teacher to ensure transparency and accountability. This template should include: <ul style="list-style-type: none"> • Documentation of lesson topics taught for each grade level. • Dates of instruction to maintain a clear record of what has been covered. 3) Provide training for teachers on how to integrate SEL principles across various subjects and daily activities, reinforcing the lessons learned in the Character Counts program.

Legal Citation: 25 CFR §36.21(b)(1-5)

A kindergarten instructional program shall include but not be limited to:

- (1) Language (observing, listening, speaking).
- (2) Exploration of the environment (number, space and time relationships, natural science).
- (3) Psychomotor and socialization development.
- (4) Development of imaginative and creative tendencies.
- (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69.

- Requirement Met
 Non-Compliance
 Not Applicable


Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

Curriculum Components: Although the SAVVAS curriculum encompasses components necessary for compliance, including language development, exploration of the environment, and socialization development, there is insufficient documentation (lesson plans) to substantiate implementation in each of these areas.

Physical Education and Health Education: While health education was covered through Physical Education (PE) during the first half of the school year, the absence of sufficient lesson planning limits the ability to demonstrate compliance.

Actions Taken	HES has adopted the SAVVAS curriculum for English Language Arts (ELA), Math, Science, and Social Studies, with ongoing training and support for its implementation. A contracted PE teacher provided health and PE instruction weekly until December 2024 by traveling into the canyon. The principal began collecting lesson plans and uploaded them to the school SharePoint site for review.
Challenges Faced	<p>Staffing Shortages: A paraprofessional currently teaches in the kindergarten classroom due to the resignation of the certified teacher, with a hiring freeze preventing the recruitment of a permanent replacement.</p> <p>Resigned PE Teacher: The contracted PE teacher also resigned in December, impacting the continuity of health education.</p> <p>Inconsistent Documentation: While the principal is collecting lesson plans, there is no requirement for lesson plans from the paraprofessional or the contracted PE teacher, leading to gaps in documentation.</p>
Recommendations	<ol style="list-style-type: none"> 1) Set expectations and provide resources for writing comprehensive lesson plans for long-term substitutes and staff members. This could include: <ul style="list-style-type: none"> • Training on how to create and implement effective lesson plans that align with the SAVVAS curriculum. 1) Develop a consistent lesson plan template that includes documentation of daily class activities, instructional tools, and strategies. This template should demonstrate how the curriculum components are being implemented and should be reviewed weekly with feedback provided to staff. 2) Establish an online learning management system where teachers can create, review, and store lesson plans. This system should include:

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- Easy access to templates and resources for lesson planning, facilitating collaboration and consistency across classrooms.
- 3) To enhance compliance and instructional quality, consider hiring an instructional leader, such as an assistant principal, coach, mentor, or teacher leader. This individual would be responsible for:
 - Providing oversight of curriculum implementation and ensuring regulatory compliance.
 - Supporting teachers in lesson planning and delivering effective instruction.
 - 4) Create a structured documentation system to track the submission of teacher lesson plans. Additionally, consider utilizing this data to provide performance feedback, promoting accountability and continuous improvement within the educational framework.

25 CFR §36.22 - Standard VII - Elementary Instructional Program

25 CFR § 36.22, Standard VII - Elementary Instructional Program falls under Subpart C - Minimum Program of Instruction. There are eleven core requirements assessed under § 36.22.

During this assessment, it was determined that 0 out of 11 requirements were met, resulting in 11 out of 11 requirements being non-compliant. For the applicable requirements, HES has achieved a 0% compliance rate for §36.21. This marks a decline from the 2024 initial assessment, which indicated that HES had a compliance rate of 18.18% for this regulation.


<p>Legal Citation: §36.22(a)(1-4)</p> <p>(a) The elementary instruction programs, <u>grades</u> one through six, shall include but need not be limited to:</p> <p>(1) Language arts.</p> <p>(2) Mathematics.</p> <p>(3) Social studies.</p> <p>(4) Sciences.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Curriculum Implementation:** The SAVVAS curriculum has been adopted for English Language Arts (ELA), Mathematics, Social Studies, and Sciences for the 2024-2025 school year. These subjects are included in the master schedule, but inconsistencies in lesson planning have been noted:
 - Lesson plans collected by the principal are often incomplete and lack sufficient detail. Many are printed from online resources, providing unclear execution timelines for when lessons are taught.
 - There is a significant absence of lesson plans for Social Studies and Science, affecting the ability to demonstrate compliance and effective curriculum delivery.

Actions Taken	HES has adopted the SAVVAS curriculum, which includes training and support for its implementation across ELA, Mathematics, Science, and Social Studies. The principal has initiated the collection of lesson plans, uploading them to the school SharePoint site for access.
Challenges Faced	Staffing Issues: The assignment of the school counselor to teach 3rd and 4th-grade classes due to an extended teacher absence has impacted class consistency and curriculum implementation.
Recommendations	<ol style="list-style-type: none"> 1) Set expectations and provide support for creating comprehensive lesson plans for long-term substitutes and assigned staff. This should include: <ul style="list-style-type: none"> • Guidance on aligning lesson plans with the SAVVAS curriculum and ensuring all essential components are accounted for. 2) Create a standardized lesson plan template that documents: <ul style="list-style-type: none"> • Daily class activities. • Instructional tools and strategies. • Clear alignment with curriculum standards. • Ensure these lesson plans are reviewed weekly with constructive feedback provided to staff. 3) Establish an online learning management system where teachers can create, review, and store lesson plans. This system should include: <ul style="list-style-type: none"> • Easy access to templates and resources for lesson planning, facilitating collaboration and consistency across classrooms.

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- 4) To enhance compliance and instructional quality, consider hiring an instructional leader, such as an assistant principal, coach, mentor, or teacher leader. This individual would be responsible for:
 - Providing oversight of curriculum implementation and ensuring regulatory compliance.
 - Supporting teachers in lesson planning and delivering effective instruction.
 - 5) Create a structured documentation system to track the submission of teacher lesson plans. Additionally, consider utilizing this data to provide performance feedback, promoting accountability and continuous improvement within the educational framework.

Legal Citation: §36.22(a)(5)

(a) The elementary instruction programs, grades one through six, shall include but need not be limited to:
(5) Fine Arts.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Fine Arts Instruction:** HES does not formally offer fine arts as part of its instructional programs. Although some staff may incorporate elements of fine arts into their lessons, there are no documented lesson plans or structured programming to demonstrate compliance with the requirement for fine arts education.
- **Importance of Fine Arts:** Fine arts are essential for fostering creativity and addressing the diverse needs of students and the community, but their absence is limiting the overall educational offerings.

Actions Taken	The school administration has begun exploring various programs to incorporate fine arts into the instructional program, including: <ul style="list-style-type: none">• Virtual opportunities.• Collaborations with college programs to bring in fine arts education, although these efforts are still in the exploratory phase.
Challenges Faced	Resource Limitations: HES currently lacks adequate classroom space, housing, and budget to employ a dedicated fine arts teacher, which inhibits the ability to develop a structured fine arts program.
Recommendations	<ol style="list-style-type: none">1) Consider hiring a fine arts teacher who can also take on additional roles in other program areas. For instance:<ul style="list-style-type: none">• The fine arts teacher could coordinate gifted and talented (GT) services, potentially generating additional funding for the school and expanding educational opportunities for students.2) Identify resources and materials for classroom teachers to effectively integrate fine arts lessons into their existing curriculum. This could include:<ul style="list-style-type: none">• Professional development workshops focused on arts integration strategies.• A resource bank of fine arts activities and lesson plans that teachers can access.3) Actively engage community and tribal members to provide fine arts education, particularly focusing on cultural arts and music. This could involve:<ul style="list-style-type: none">• Collaborating with local artists, musicians, and cultural experts to deliver workshops and instruction that honor and reflect the rich cultural heritage of the Havasupai community.• Creating partnerships with tribal organizations to facilitate cultural arts programs that enrich the curriculum and foster connections between students and their cultural identity.

Legal Citation: §36.22(a)(6)

The elementary instruction programs, grades one through six, shall include but need not be limited to:

(6) Physical Education.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Physical Education Services:** A contracted Physical Education (PE) teacher provided services from the start of the school year until December 2024. However, after her resignation, no PE services have been provided to students, hindering their physical education opportunities.
- **Insufficient Documentation:** There are no available lesson plans to document the PE instruction that occurred during the first half of the school year, leading to issues with compliance and accountability.

Actions Taken	The PE teacher position was advertised as a full-time position in the canyon, and a candidate was selected with a tentative job offer. Unfortunately, this offer was rescinded due to a federal hiring freeze, which has halted efforts to replace the contracted PE teacher. The school did assign a paraprofessional to provide PE instruction from January to February 10, 2025, when this staff member was reassigned to be the school cook.
Challenges Faced	Collecting and reviewing lesson plans has presented a challenge for the school. There may be inconsistencies in submissions, a lack of clarity in expectations, or issues related to timely collection that hinder effective oversight and feedback. Addressing these challenges is crucial for ensuring compliance and enhancing the quality of instruction.
Recommendations	<ol style="list-style-type: none">1) Establish a documentation system to track teacher lesson plan submissions and consider using this data when providing performance feedback.2) Until a PE teacher can be hired, work collaboratively to provide organized physical activities for students during the scheduled time. Document these activities in lesson plans.

Legal Citation: §36.22(b)(1-2, 4)

(b) Each school shall integrate the following content areas into its curriculum:

- (1) Career awareness
- (2) Environmental and safety education
- (4) Metric education

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Integration of Content Areas:** The Savvas curriculum is designed to effectively integrate various content areas into the core curriculum—specifically through:
 - Science curriculum including career connections and safety education.
 - Math and Science curriculums incorporating metric education— there is insufficient documentation to verify that these lessons are consistently taught in classrooms.
- **Lack of Lesson Plans:** The absence of consistent and detailed lesson plans means there is no sufficient evidence to show compliance with the integration requirements of career awareness, environmental and safety education, and metric education.

Actions Taken	HES has adopted the Savvas curriculum for English Language Arts (ELA), Math, Science, and Social Studies, with implementation supported by training and professional development throughout the school year. The selected curriculum effectively integrates these content areas. Teachers are expected to submit their lesson plans weekly on Mondays, and the principal uploads these plans to the school’s SharePoint site.
Challenges Faced	While teachers are submitting lesson plans, it is important to clarify and align expectations regarding their content. Some teachers are printing off sample lesson plans for each unit and submitting them to fulfill the weekly requirement, which does not reflect customized or detailed planning. Lessons should be dated and tailored to demonstrate how the curriculum is implemented daily. Additionally, there are few to no lesson plans submitted for Science and Social Studies.
Recommendations	<ol style="list-style-type: none">1) Create a standardized lesson plan template that ensures all required content areas are addressed. This template should include:<ul style="list-style-type: none">• Documentation of daily class activities, instructional tools, and strategies.• A clear way to demonstrate the integration of career awareness, environmental and safety education, and metric education.• Ensure that lesson plans are reviewed weekly, with constructive feedback provided to enhance instructional quality.2) Implement an online learning management system where lesson plans can be created, reviewed, and templates uploaded for easy access.3) To enhance compliance and instructional quality, consider hiring an instructional leader, such as an assistant principal, coach, mentor, or teacher leader. This individual would be responsible for:<ul style="list-style-type: none">• Providing oversight of curriculum implementation and ensuring regulatory compliance.• Supporting teachers in lesson planning and delivering effective instruction.

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| | 4) Create a structured documentation system to track the submission of teacher lesson plans. Additionally, consider utilizing this data to provide performance feedback, promoting accountability and continuous improvement within the educational framework. |
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Legal Citation: §36.22(b)(3)

(b) Each school shall integrate the following content areas into its curriculum:

(3) Health education (includes requirements contained in 24 Stat. 69),

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Health Education Integration:** Although Physical Education (PE) was taught during the first half of the school year and included components of health education, there is a lack of sufficient lesson plans to substantiate compliance with health education requirements. This absence of documentation makes it challenging to verify that all required components of health education are being adequately implemented.

Actions Taken	<p>A contracted Physical Education teacher provided PE and health instruction to all students weekly until December 2024, accommodating travel to the canyon for classes.</p> <p>The principal has initiated the collection of lesson plans and uploaded them to the school SharePoint site for access and review.</p>
Challenges Faced	<p>Inability to Fill the Vacant PE Position: Following the resignation of the contracted PE teacher in December due to a federal hiring freeze, HES has been unable to fill the position, leading to a gap in PE and health instruction.</p>
Recommendations	<ol style="list-style-type: none">1) Create a lesson plan template that meets all regulatory requirements and documents daily class activities, instructional tools, and strategies. The template should ensure:<ul style="list-style-type: none">• Clear tracking of health education components within PE instruction.• Lesson plans should be reviewed weekly, and constructive feedback should be provided to staff to enhance instructional practices.2) Implement an online learning management system where lesson plans can be created, reviewed, and templates uploaded for easy access.3) To achieve compliance with instructional program regulations, consider hiring an instructional leader, such as an assistant principal, instructional coach, or teacher leader. This individual would be responsible for:<ul style="list-style-type: none">• Overseeing the implementation of health education within PE and ensuring that curriculum standards are met.4) Establish a documentation system to track teacher lesson plan submissions and consider using this data when providing performance feedback.

Legal Citation: §36.22(b)(5)

(b) Each school shall integrate the following content areas into its curriculum:

(5) Computer literacy.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Insufficient Integration of Computer Literacy:** While some computer literacy programs are utilized in the school, such as i-Ready, Savvas curriculum activities, typing.com, and other resources, the implementation and monitoring of these programs lack clarity.
- **Lack of Documentation:** There are no lesson plans available that demonstrate how teachers are intentionally developing and integrating computer literacy skills into lessons and classroom instruction.

Actions Taken	The school has purchased typing.com as a resource for teachers to assist in integrating computer literacy into classroom instruction.
Challenges Faced	Inconsistent Usage of Resources: Typing.com is not consistently implemented in classrooms, and there is currently no expectation or requirement for teachers to document lessons focused on computer literacy through their lesson plans. This inconsistency hampers the effectiveness of the program.
Recommendations	<ol style="list-style-type: none">1) Develop a standard lesson plan template that includes specific documentation requirements for integrating computer literacy into lessons. This template should ensure that:<ul style="list-style-type: none">• All teachers are accountable for incorporating computer literacy into their curriculum.• Lessons are tracked to demonstrate how computer literacy skills are being developed through various activities and resources, including typing.com and other digital tools.2) Foster collaboration among teachers to share best practices and resources for effectively integrating computer literacy into their curriculum. This could entail:<ul style="list-style-type: none">• Organizing collaborative planning sessions or professional learning communities focused on technology integration.

25 CFR §36.23, Standard VIII - Junior High/Middle School Instructional Program

25 CFR § 36.23, Standard VII - Junior High/Middle School Instructional Program falls under Subpart C - Minimum Program of Instruction. There are fifteen core requirements assessed under § 36.23.

During this assessment, it was determined that 1 out of 15 requirements were met, 1 out of 15 is not applicable resulting in 13 out of 15 requirements being non-compliant. For the applicable requirements, HES has achieved a .07% compliance rate for §36.23. This marks a decline from the 2024 initial assessment, which indicated that HES had a compliance rate of 21.43% for this regulation.

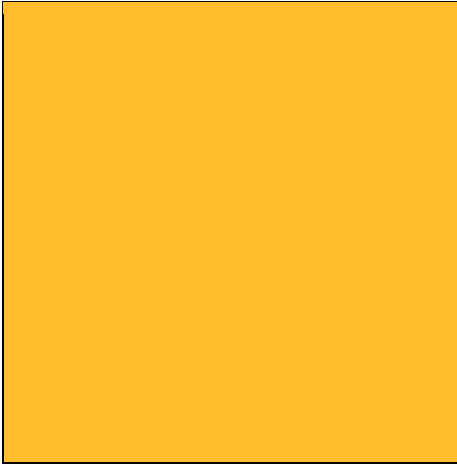
<p>Legal Citation: §36.23(a):</p> <p>(a) The instructional program shall reflect the school's philosophy and the needs of the students and the community. It shall be part of a progressive development that begins in the elementary program which precedes it and continues to the secondary program which follows.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Alignment with Community Needs:** The instructional program has not been intentionally aligned with the needs of the students and the community. Although a needs assessment was completed, it failed to incorporate comprehensive community input, limiting its effectiveness in addressing student needs.
- **Curriculum Utilization:** While the Savvas curriculum has been adopted for reading, math, science, and social studies, the effectiveness of its utilization remains unclear. This raises questions about how well the curriculum contributes to progressive development for students transitioning to secondary education.

Actions Taken	The Savvas curriculum has been adopted, and multiple training sessions have been conducted to assist in its implementation. The school’s BIE One Plan includes an analysis of community and student data, but it lacked specific information on community and student outcomes at the time of the needs assessment.
Challenges Faced	The arrival of a new principal in May 2024 posed challenges for the school improvement process—specifically the Needs Assessment, Root Cause Analysis, SMART goals, and program planning—due to a lack of valid data. After this school year, the school should have a clearer understanding of the needs of both students and the community to develop a meaningful plan.
Recommendations	<ol style="list-style-type: none"> 1) Collaborate with the facilitator, to effectively assess the needs of the community. This should involve: <ul style="list-style-type: none"> • Questionnaires or focus groups with community members to gather insights on their educational expectations and priorities for students. • Analyzing the collected data to identify key areas for improvement in the instructional program.

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- 2) Work in partnership with the ADD-BOS Curriculum Specialist to review and adjust curriculum maps. This effort should ensure that:
 - The curriculum is properly implemented in alignment with student needs and community expectations.
 - Any gaps in the curriculum that hinder progressive development are identified and addressed.
 - 3) Collaborate with Off-Reservation Boarding schools to create a plan that prepares students for the transition to high school.
 - 4) Form a team that includes all stakeholders—teachers, parents, community members, and students—to develop a school philosophy that reflects the needs of students and the community. This team should:
 - Use data collected from the comprehensive needs assessment to inform discussions and create actionable philosophies and goals that align with community values and student interests.

Legal Citation: §36.23(b)(1-4):

The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

- (1) Language arts. One unit shall be required of each student every year.
- (2) Social studies. One unit shall be required of each student every year.
- (3) Mathematics. One unit shall be required of each student every year.
- (4) Science. One unit shall be required of each student every year.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Curriculum Implementation:** HES has adopted the SAVVAS curriculum for English Language Arts (ELA), Mathematics, Social Studies, and Science for the 2024-2025 school year. These subjects are part of the master schedule; however, issues exist regarding:
 - Inconsistency in the completion of lesson plans, which are not adequately documented or reviewed.
 - Submitted lesson plans primarily consist of printed material from online resources, offering unclear insights on the timing and delivery of lessons.
- **Insufficient Evidence of Compliance:** The inadequacy of lesson plans means there is insufficient evidence to confirm that the curriculum is being effectively followed across required content areas.

Actions Taken	HES has adopted the Savvas curriculum for English Language Arts (ELA), Math, Science, and Social Studies, which is accompanied by ongoing training and support for its implementation. The principal collects lesson plans and uploads them to the school SharePoint site.
Challenges Faced	Lack of Clear Guidance on Lesson Plans: Although the expectation for weekly lesson plan submissions has been communicated, staff have not received clear guidelines or a structured template detailing the necessary components for these plans.
Recommendations	<ol style="list-style-type: none">1) Require and provide support for creating comprehensive lesson plans for long-term substitutes and assigned staff. This should include:<ul style="list-style-type: none">• Guidance on aligning lesson plans with the SAVVAS curriculum and ensuring all essential components are accounted for.2) Create a standardized lesson plan template that documents:<ul style="list-style-type: none">• Daily class activities.• Instructional tools and strategies.• Clear alignment with curriculum standards.• Ensure these lesson plans are reviewed weekly with constructive feedback provided to staff.3) Establish an online learning management system where teachers can create, review, and store lesson plans. This system should include:<ul style="list-style-type: none">• Easy access to templates and resources for lesson planning, facilitating collaboration and consistency across classrooms.4) To enhance compliance and instructional quality, consider hiring an instructional leader, such as an assistant principal, coach, mentor, or teacher leader. This individual would be responsible for:<ul style="list-style-type: none">• Providing oversight of curriculum implementation and ensuring regulatory compliance.• Supporting teachers in lesson planning and delivering effective instruction.

- 5) Create a structured documentation system to track the submission of teacher lesson plans. Additionally, consider utilizing this data to provide performance feedback, promoting accountability and continuous improvement within the educational framework.

Legal Citation: §36.23(b)(5):

(b) The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:
 (5) Fine arts and practical arts. One unit each shall be required of each student in the junior high/middle school instructional program.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Absence of Fine Arts and Practical Arts Instruction:** HES does not currently offer fine arts or practical arts as part of its instructional program. Although some staff may be incorporating elements of fine arts and practical arts into lessons, there are no formal, lesson plans available to demonstrate compliance with the regulatory requirement.
- **Importance of Arts Education:** Fine and practical arts are essential for addressing the holistic needs of students and fostering creativity and engagement, making their absence a significant gap in the educational offerings.

Actions Taken	The school administration has begun exploring programs to incorporate fine and practical arts into the instructional program, including virtual opportunities and collaborations with college programs.
Challenges Faced	Resource Limitations: HES currently lacks adequate classroom space, housing, and budget to employ a dedicated fine arts teacher, which inhibits the ability to develop a structured fine arts program.
Recommendations	<ol style="list-style-type: none"> 1) Consider hiring a fine arts teacher who can also take on additional roles in other program areas. For instance: <ul style="list-style-type: none"> • The fine arts teacher could coordinate gifted and talented (GT) services, potentially generating additional funding for the school and expanding educational opportunities for students. 2) Identify resources and materials for classroom teachers to effectively integrate fine arts lessons into their existing curriculum. This could include: <ul style="list-style-type: none"> • Professional development workshops focused on arts integration strategies. • A resource bank of fine arts activities and lesson plans that teachers can access. 3) Actively engage community and tribal members to provide fine arts education, particularly focusing on cultural arts and music. This could involve: <ul style="list-style-type: none"> • Collaborating with local artists, musicians, and cultural experts to deliver workshops and instruction that honor and reflect the rich cultural heritage of the Havasupai community. 4) Creating partnerships with tribal organizations to facilitate cultural arts programs that enrich the curriculum and foster connections between students and their cultural identity.

Legal Citation: §36.23(b)(6):

(b) The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

(6) Computer literacy. One unit shall be required of each student in the junior high/middle school instructional program.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Insufficient Integration of Computer Literacy:** While computer literacy is integrated into various programs such as i-Ready, Savvas curriculum activities, typing.com, and other teacher-initiated programs, the implementation and monitoring of computer literacy education lacks clarity.
- **Lack of Documentation:** There are no lesson plans documenting how teachers are developing and integrating computer literacy into their lessons, making it difficult to ascertain whether students are receiving the required instruction.

Actions Taken	The school has purchased typing.com as a resource for teachers to assist in integrating computer literacy into classroom instruction.
Challenges Faced	Inconsistent Usage of Resources: Typing.com is not consistently implemented in classrooms, and there is currently no expectation or requirement for teachers to document lessons focused on computer literacy through their lesson plans. This inconsistency hampers the effectiveness of the program.
Recommendations	<ol style="list-style-type: none">1) Develop a standard lesson plan template that includes specific documentation requirements for integrating computer literacy into lessons. This template should ensure that:<ul style="list-style-type: none">• All teachers are accountable for incorporating computer literacy into their curriculum.• Lessons are tracked to demonstrate how computer literacy skills are being developed through various activities and resources, including typing.com and other digital tools.2) Foster collaboration among teachers to share best practices and resources for effectively integrating computer literacy into their curriculum. This could entail:<ul style="list-style-type: none">• Organizing collaborative planning sessions or professional learning communities focused on technology integration.

Legal Citation: §36.23(b)(7)

The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

(7) Physical education. One unit shall be required of each student in the junior high/middle school instructional program.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Physical Education Services:** HES had a contracted Physical Education (PE) teacher who provided services from the beginning of the school year until December 2024. However, after her resignation, no PE services have been provided to students, resulting in a gap in required instruction.
- **Insufficient Documentation:** There are no available lesson plans documenting any PE instruction for the first half of the school year, which complicates compliance verification with the physical education requirements.

Actions Taken	The PE teacher position was advertised as a full-time position in the canyon, and a candidate was selected with a tentative job offer. Unfortunately, this offer was rescinded due to a federal hiring freeze, which has halted efforts to replace the contracted PE teacher.
Challenges Faced	Collecting and reviewing lesson plans has presented a challenge for the school. There may be inconsistencies in submissions, a lack of clarity in expectations, or issues related to timely collection that hinder effective oversight and feedback. Addressing these challenges is crucial for ensuring compliance and enhancing the quality of instruction.
Recommendations	<ol style="list-style-type: none">1) Establish a documentation system to track teacher lesson plan submissions and consider using this data when providing performance feedback.2) Until a PE teacher can be hired, work collaboratively to provide organized physical activities for students during the scheduled time. Document these activities in lesson plans.

Legal Citation: §36.23(c)(1-4):

(c) The following content areas shall be integrated into the curriculum.

- (1) Career exploration and orientation.
- (2) Environmental and safety education.
- (3) Metric education.
- (4) Consumer economics (including personal finances).

Requirement Met

Non-Compliance

Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Integration of Content Areas:** While the Savvas curriculum is designed to effectively integrate various content areas, including career exploration, environmental and safety education, metric education, and consumer economics, there is a significant lack of consistent lesson plans that document when and how these topics are taught in the classroom.
- **Insufficient Evidence of Compliance:** The absence of detailed and customized lesson plans means there is inadequate evidence to demonstrate compliance with the requirements for integrating these essential content areas.

Actions Taken	HES has adopted the Savvas curriculum for English Language Arts (ELA), Math, Science, and Social Studies, with implementation supported by training and professional development throughout the school year. The selected curriculum effectively integrates these content areas. Teachers are expected to submit their lesson plans weekly on Mondays, and the principal uploads these plans to the school’s SharePoint site.
Challenges Faced	Inconsistent Lesson Plans: Although some teachers are submitting lesson plans, there is a lack of clarity regarding the expectations for content. Many teachers submit generic or sample lesson plans that do not reflect tailored, detailed planning specific to their classrooms. Additionally, lessons are not consistently dated or reflective of daily implementation.
Recommendations	<ol style="list-style-type: none"> 1) Create a standardized lesson plan template that ensures all required content areas are addressed. This template should include: <ul style="list-style-type: none"> • Documentation of daily class activities, instructional tools, and strategies. • A clear way to demonstrate the integration of career awareness, environmental and safety education, and metric education. • Ensure that lesson plans are reviewed weekly, with constructive feedback provided to enhance instructional quality. 2) Implement an online learning management system where lesson plans can be created, reviewed, and templates uploaded for easy access. 3) To enhance compliance and instructional quality, consider hiring an instructional leader, such as an assistant principal, coach, mentor, or teacher leader. This individual would be responsible for: <ul style="list-style-type: none"> • Providing oversight of curriculum implementation and ensuring regulatory compliance. • Supporting teachers in lesson planning and delivering effective instruction. 4) Create a structured documentation system to track the submission of teacher lesson plans. Additionally, consider utilizing this data to

	provide performance feedback, promoting accountability and continuous improvement within the educational framework.
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Legal Citation: §36.23(c)(5): (c) The following content areas shall be integrated into the curriculum. (5) Health education (includes meeting the requirements contained in 24 Stat. 69).	
<input type="checkbox"/> Requirement Met <input checked="" type="checkbox"/> Non-Compliance <input type="checkbox"/> Not Applicable	

Finding:
 Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- Lack of Documentation for Health Education:** While Physical Education (PE) was taught during the first half of the school year and included health education, there are insufficient lesson plans available to demonstrate compliance with health education requirements. The absence of adequate documentation makes it challenging to verify whether all required components of health education were adequately implemented.

Actions Taken	A contracted Physical Education teacher provided PE and health instruction to all students weekly until December 2024, accommodating travel to the canyon for classes. The principal has initiated the collection of lesson plans and uploaded them to the school SharePoint site for access and review.
Challenges Faced	Inability to Fill the Vacant PE Position: Following the resignation of the contracted PE teacher in December due to a federal hiring freeze, HES has been unable to fill the position, leading to a gap in PE and health instruction.
Recommendations	<ol style="list-style-type: none"> 1) Create a lesson plan template that meets all regulatory requirements and documents daily class activities, instructional tools, and strategies. The template should ensure: <ul style="list-style-type: none"> • Clear tracking of health education components within PE instruction. • Lesson plans should be reviewed weekly, and constructive feedback should be provided to staff to enhance instructional practices. 2) Implement an online learning management system where lesson plans can be created, reviewed, and templates uploaded for easy access. 3) To achieve compliance with instructional program regulations, consider hiring an instructional leader, such as an assistant principal, instructional coach, or teacher leader. This individual would be responsible for: <ul style="list-style-type: none"> • Overseeing the implementation of health education within PE and ensuring that curriculum standards are met. 4) Establish a documentation system to track teacher lesson plan submissions and consider using this data when providing performance feedback.

Legal Citation: §36.23(d)

Languages other than English are encouraged to be offered as a content area beginning at junior high/middle school level.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School offers a Havasupai culture and language specials class, with each student scheduled for 45 minutes once every five full instructional days.

Legal Citation: §36.23(e)

Student enrollment in any laboratory or vocational exploration class shall be consistent with applicable health and safety standards.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Not Applicable, as HES does not offer any laboratory or vocational exploration classes.

25 CFR §36.30, Standard X - Grading Requirements

25 CFR § 36.30, Standard X - Grading Requirements falls under Subpart D - Student Instruction Evaluation. There are five core requirements assessed under § 36.30.

During this assessment, it was determined that 2 out of 5 requirements for §36.23 were met, resulting in 3 out of 5 requirements being non-compliant. For the applicable requirements, HES has achieved a 40% compliance rate for §36.23. This rate remains unchanged from the 2024 initial assessment, which also indicated that HES had a compliance rate of 40% for this regulation.


<p>§36.30(a)</p> <p>Each school shall implement a uniform grading system which assesses a student's mastery of the prescribed objectives of the courses of study undertaken. The mastery of prescribed course objectives shall be the primary measure of academic attainment for reporting student grades on report cards.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- Lack of Grading Policy:** HES has a grade level promotion policy stating that “a student advances to the next level based on measurable mastery of instructional objectives for the current grade,” as outlined in the Student Handbook. However, there is no grading policy present in either the teacher or student handbook, leaving it unclear whether grades are based on mastery of prescribed objectives. Currently, common assessments are not used, and assessments are not reviewed by the administration or during Professional Learning Communities (PLCs).

Actions Taken	Teachers are inputting and updating grades.
Challenges Faced	There are no clear expectations or procedures established for teachers regarding grade book maintenance, which may result in inconsistencies in how student performance is evaluated and reported.
Recommendations	<ol style="list-style-type: none"> 1) Update the teacher handbook to include specific grading policies and procedures, which should encompass: <ul style="list-style-type: none"> • Frequency of Grade Input: Specify how often assignments and assessments should be entered into the grade book. • Grading Timeline: Outline the timeline for grading assessments after they are given. • Assignment Identification: Provide guidelines on how different types of assignments (e.g., homework, quizzes, projects) should be categorized and identified within the grade book. • Linkages to Standards: Establish clear connections between assessments, assignments, and relevant academic standards to ensure that grading reflects mastery of prescribed objectives. 2) Implement a system to periodically monitor grade books to verify that teachers adhere to the established grading expectations and procedures. This may involve:

- 
- Regular reviews by administration or designated staff to ensure that grades are recorded consistently and accurately.
 - Providing feedback to teachers based on these reviews to reinforce best practices in grade book maintenance.

Legal Citation: §36.30(b)

(b) The information derived from student instructional evaluations shall be shared with the student and with the parents and shall be used to give teachers and students direction for subsequent learning activities.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Established System for Sharing Assessment Data:** HES hosted parent-teacher conferences from October 28-31, 2024, to share grades and information with parents. However, there is no established system or expectation indicating that teachers are formally using assessment data to adjust learning activities. While some teachers may implement this practice, it is not consistently monitored or documented through lesson plans. Additionally, parents currently do not have access to the parent portal in NASIS, which limits their ability to track their children's academic progress.

Actions Taken	To improve the efficiency of parent-teacher conferences, teachers scheduled their time with parents whenever possible, while also accommodating parents who attended without an appointment. Additionally, report cards are mailed home to parents at the end of each quarter, ensuring that they receive regular updates on their children's academic performance.
Challenges Faced	Assessment practices have not been standardized or consistently applied across all grade levels, making it difficult to collect meaningful data that can be shared with parents effectively.
Recommendations	<ol style="list-style-type: none">1) Contact the BIE NASIS Specialist to assist in providing parents with access to the NASIS system, enabling them to track their children's academic progress more effectively.2) Set the expectation for all staff to maintain a contact log for interactions with parents, documenting attempts to share student assessment information to foster communication and accountability.3) Create local PLCs to support teachers in using data to inform their instruction effectively. These communities can provide collaborative environments for teachers to share best practices and strategies based on assessment data.4) Set the expectation for all instructional staff to document in their lesson plans how they will adjust lessons based on student data, ensuring that evaluation results influence instructional strategies.5) Plan to host parent-teacher conferences in the spring, in addition to the fall, to provide ongoing opportunities for parental engagement and communication regarding student progress.

Legal Citation: §36.30(c)

(c) Parent/teacher and parent/teacher/student conferences focused on the student's instructional progress and development shall be held, where feasible and practical, to provide an additional means of communication between home and school. Residential schools may meet this standard by documenting the communication of student grades on report cards to parents.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as compliant with this regulation for the following reasons:

- **Parent-Teacher Conference:** HES hosted parent-teacher conferences from October 28-31, 2024, during which grades, and information were shared with parents. These conferences provided an important means of communication between the school and home regarding student instructional progress and development. Additionally, it's noted that HES does not have a residential program, which aligns with the compliance expectations outlined in the regulation.

Legal Citation: §36.30(d) (1-3)

(d) Each school shall issue a report card to parents of students who are under the age of eighteen (18) and to students eighteen (18) years of age and older on a regular basis, but not less than four (4) times yearly. The report card shall include, but not be limited to, the following sections:

- (1) Recommendations and probable promotion status;
- (2) Appropriate signatures and request for return of report cards; and
- (3) Student attendance record.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Incomplete Report Card Information:** HES does issue report cards, but they do not contain all the required information as specified in the regulation. Currently, there are no signatures present on the report cards. Additionally, the probable promotion status will only appear on the final report card at the end of the school year.

Actions Taken	Report cards are being mailed home to parents on a quarterly basis. The school has also worked to develop record-keeping protocols concerning attendance and the accuracy of assigned teachers in the NASIS system. Furthermore, both the school-level NASIS coordinator and the administrator have received training in NASIS to improve data collection through this system.
Challenges Faced	In the previous school year, HES struggled with maintaining accurate attendance records and faced inconsistencies with grade books. Furthermore, issues arose with students not being assigned to the correct teachers due to staffing inconsistencies and a lack of training for the effective use of NASIS.
Recommendations	<ol style="list-style-type: none"> 1) Establish and keep a school-level log for documenting communications with parents, including the sending home of report cards. This log should help illustrate consistency in communication and ensure that all required elements of the report card process are being addressed moving forward. 2) Revise the report card format to include all necessary sections, specifically ensuring that signatures are obtained and recorded, and incorporate recommendations and probable promotion status to meet regulatory requirements.

Legal Citation: 36.30(e)

A summary of each year's final card shall become part of the student's permanent school record.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as compliant with this regulation for the following reasons:

- **Proper Maintenance of Report Card Data:** The data from report cards are maintained in the NASIS system. At the end of the school year, the school will file the final report card in the student's cumulative file, ensuring it becomes part of the student's permanent school record.

25 CFR §36.31, Standard XI - Student Promotion Requirements

25 CFR § 36.31, Standard XI - Student Promotion Requirements falls under Subpart D - Student Instruction Evaluation. There are four core requirements assessed under § 36.31

During this assessment, it was determined that 0 out of 4 requirements were met, resulting in 4 out of 4 requirements being non-compliant. For the applicable requirements, HES has achieved a 0% compliance rate for §36.31. This remains unchanged from the 2024 initial assessment, which indicated that HES had a compliance rate of 0% for this regulation.

Legal Citation: 25 CFR § 36.31:

Each school shall establish and implement a promotion policy which shall be submitted to and approved by the local school board and Agency Superintendent for Education or Area Education Programs Administrator, as appropriate.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Approval and Compliance Issues:** There is a promotion policy included in the handbook that has been approved by the school board; however, there is currently no documentation indicating that the Education Program Administrator approved the policy as well. Additionally, the existing policy is missing the criteria specified in part b of this section. Although the policy exists in the handbook, HES is not fully implementing the promotion policy as outlined.

Actions Taken	There is a school board in place that has reviewed the handbooks. They requested certain changes, which were subsequently made, and the revised handbooks received their approval. This process indicates that the school board is actively involved in ensuring that the policies and procedures are up-to-date and aligned with the school's goals.
Challenges Faced	HES has struggled with inefficient systems for record-keeping, as well as documenting and tracking data. To achieve compliance with this regulation, HES needs to establish clear expectations for assessing students and updating grade books.
Recommendations	<ol style="list-style-type: none"> 1) Update the handbooks to include all components of the promotion policy as outlined in the regulation. Ensure that the criteria specified in part b of this section are incorporated and clearly defined. 2) Establish a systematic approach to document the approval process of the promotion policy by the Education Program Administrator, ensuring compliance with regulatory requirements.

Legal Citation: 25 CFR § 36.31(a):

Each grade level or equivalent shall have a minimum criteria for student promotion based primarily on measurable mastery of the instructional objectives.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Implementation Issues with Promotion Criteria:** While measurable mastery of instructional objectives is included in the approved grade-level promotion policy, it is not being fully implemented. The instructional program and assessments do not effectively measure grade-level instructional objectives, leading to discrepancies in how student mastery is evaluated.

Actions Taken	Grades are being recorded in the grade book; however, these grades do not necessarily reflect mastery of the grade-level instructional objectives.
Challenges Faced	HES has not established clear expectations for what constitutes “measurable mastery,” resulting in inconsistencies in grading and promotion criteria across grade levels. This lack of clarity hinders the effective implementation of the promotion policy.
Recommendations	<ol style="list-style-type: none">1) The Administrator should collect and review all assessments alongside weekly lesson plans to ensure that instructional objectives are being assessed appropriately. This will help align grading practices with the established promotion policy and support more consistent outcomes for student advancement.2) Provide training for instructional staff on effective assessment practices that align with the grade-level objectives. This training should focus on developing assessments that accurately reflect student mastery and inform grading decisions.

Legal Citation: 25 CFR § 36.31(b):

Criterion-referenced tests that evaluate student skills shall be utilized for measuring the mastery of instructional objectives. The evaluation results shall form the basis for the promotion of each student.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Absence of Evaluation Criteria in Promotion Policy:** The requirement for criterion-referenced tests to evaluate student skills is not included in the school's promotion policy. While HES has reviewed and revised its handbook and policies, this specific sub-regulation was overlooked during the update process.

Actions Taken	HES did review and revise the handbook and policies; however, this specific sub-regulation was not included in the promotion policy.
Challenges Faced	The new administration at HES had to review all school policies, procedures, and practices to work toward compliance, which created challenges in ensuring that all necessary regulations were addressed.
Recommendations	1) Revise the promotion policy to include this sub-regulation. Additionally, develop and document procedures and protocols to properly implement the updated policy, ensuring that all aspects of the promotion criteria are clearly defined and communicated.

Legal Citation: 25 CFR § 36.31(c):

A student who has not participated, either directly or through approved alternative instructional methods or programs, in a minimum of 160 instructional days per academic term or 80 instructional days per semester without a written excused absence shall not be promoted. A school board or a school committee may review a promotion decision and, if warranted due to compelling and/or extenuating circumstances, rescind in writing such action on a case-by-case basis. Alternative instructional methods shall be submitted in writing for approval by the Agency Superintendent for Education or Area Education Programs Administrator, as appropriate.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Implementation Issues with Attendance Requirements:** Although this requirement is included in the approved Grade Level Promotion Policy, it has not been fully implemented. All students who do not meet the minimum attendance requirements should have documented meetings with the school board or a committee to review their promotion decisions.

Actions Taken	A policy is in place, and there is now an established school board. The school has also implemented systems for maintaining accurate attendance records, which is essential for assessing compliance with the promotion policy.
Challenges Faced	The school has faced difficulties in keeping accurate attendance records in previous years, which has complicated adherence to this regulation. Now that attendance is being verified and documented, the school can more accurately assess promotion status.
Recommendations	<ol style="list-style-type: none"> 1) Create a committee to review promotion decisions at the end of the school year for students who do not meet the attendance requirements. This will ensure proper oversight, accountability, and adherence to the established promotion policy. 2) Create a dedicated team to track and provide interventions for chronically absent students, helping to address attendance issues proactively and support student success.

25 CFR §36.40, Standard XIII - Library/Media program

25 CFR § 36.40, Standard XIII - Library/media program falls under Subpart E - Instructional Support. There are eight core requirements assessed under § 36.40.

During this assessment, it was determined that 0 out of 8 requirements were met, resulting in 8 out of 8 requirements being non-compliant. For the applicable requirements, HES has achieved a 0% compliance rate for §36.40. This remains unchanged from the 2024 initial assessment, which indicated that HES had a compliance rate of 0% for this regulation.

Legal Citation: §36.40(a)(1)

(a) Each school shall provide a library/media program which shall, as a minimum, meet the applicable state and/or regional standards, but shall not be limited to these, and shall include the following:

(1) A written set of instructional and service objectives shall be established that is integrated and consistent with the school's educational goals and philosophy. The librarian or educational media specialist, with students and staff, shall set objectives based on assessed academic and residential needs. The program and services will be evaluated yearly by the principal and the librarian or educational media specialist to determine the degree to which all objectives have been met.

Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Library Services and Defined Philosophy:** HES does not currently have a librarian. A contracted librarian who visited the school weekly resigned at the beginning of the school year. Additionally, HES does not have a defined school philosophy, although SMART educational goals have been set through the BIE One Plan.

Actions Taken	The librarian position was posted and selected with a tentative job offer; however, the offer was rescinded due to the federal hiring freeze. The school set educational goals through the BIE One Plan and considered the needs of the library during the comprehensive needs assessment.
Challenges Faced	The resignation of the contracted librarian at the beginning of the school year has left a gap in library services. While the school was able to post and select a new librarian, the federal hiring freeze has impeded that position from being filled.
Recommendations	<ol style="list-style-type: none"> 1) Establish a team that includes all stakeholders to develop a school philosophy that reflects the needs of students and the community, using data gathered from a comprehensive needs assessment. 2) During staff meetings, collaborate with teachers to establish instructional and service objectives that align with the school's SMART goals, thereby supporting classroom instruction and activities effectively. 3) Consider implementing interim library services using existing staff or utilizing volunteers until a permanent librarian can be hired. This may involve training staff to assist with library services and maintaining access to library materials for students.

Legal Citation: §36.40(a)(2)(i-v)

A written policy for the selection of materials and equipment shall be developed by a library committee in collaboration with the librarian and be approved by the school board. The collection of materials shall include as a minimum the following:

(i) A collection of books suitable for the range of student abilities and interests being served in the following ADM ratios.

(A) Elementary K-6, 15 books per student

(B) Middle 7-8, 12 books per student

(C) Secondary 9-12, 10 books per student

It is required that materials pertaining to Indian Tribes and/or Alaskan Natives be integrated within this basic collection.

(ii) Eight (8) to 12 percent of the basic collection must be composed of reference books, currently relevant and in a state of good physical condition, for practical use. Single copies of the principal textbooks used to complement instruction shall be in the collection, but textbooks cannot be counted toward this standard.

(iii) A periodical collection, suitable for the range of student abilities and interests being served, consisting of one (1) periodical for every ten (10) students, shall be maintained. Schools of over 200 will have a base collection of 20 periodicals.

(iv) A professional collection for the school staff shall be developed and maintained by the librarian in cooperation with a faculty committee.

(v) A variety of audio-visual materials, suitable for the range of instruction being provided, of at least 750 items or five (5) items for each student, whichever is larger, and inclusive of materials located in the classrooms shall be maintained. This category includes some of each of the following: Tactile objects, globes, models, maps, films, film-strips, microforms, slides, audio and video tapes, recordings, transparencies and graphics, and the equipment to use all of these. Multiple items within a specific set of materials will be counted as separate items.

Requirement Met

Non-Compliance

Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Written Policy and Inventory:** HES currently lacks a written policy for the selection of materials and equipment. While the school has a large collection of books suitable for a variety of student abilities and interests, this collection has not been inventoried, leaving it unclear whether it meets the criteria for compliance with relevant regulations. Furthermore, textbooks are not part of the library collection, and there is insufficient documentation regarding the inclusion of materials relevant to Indian Tribes and/or Alaskan Natives.
- Additionally, the school does not subscribe to periodicals for students, and although there are some audio-visual materials on campus, these resources are also not inventoried or tracked due to the absence of a librarian. Consequently, the library's ability to effectively support student learning and comply with regulatory standards is compromised.

<p style="text-align: center;">Actions Taken</p>	<p>The school has shelved all books in a way that makes them easy to access, facilitating the use of the library as a workspace for students and staff. This organizational effort is commendable but insufficient for meeting compliance standards.</p>
<p style="text-align: center;">Challenges Faced</p>	<p>With no librarian on staff, HES lacks the manpower and specialized knowledge needed to inventory and organize the library effectively. Although the library appears to be cleaned up and organized, there is currently no established process for students to utilize the collection of books appropriately.</p>
<p style="text-align: center;">Recommendations</p>	<ol style="list-style-type: none"> 1) Establish a library committee that includes teachers, parents, community members, and the new librarian (once appointed). This committee should be tasked with: <ul style="list-style-type: none"> • Developing and reviewing a written policy for selecting materials and equipment that align with regulatory requirements. • Identifying criteria for evaluating and selecting materials, including the integration of books relevant to Indian Tribes and/or Alaskan Natives. • Ensuring that the collection is representative of the diverse interests and abilities of the student body. • Determining staff needs for a professional collection. 2) Research and initiate subscriptions to relevant periodicals that cater to the interests and abilities of students. This will enhance the resources available and foster engagement with current events and topics.

Legal Citation: §36.40(a)(3)

(3) There shall be a library media center serviced by a librarian. Schools with fewer than 200 students are encouraged, wherever feasible, to cooperate in sharing librarian resources. Schools within an Agency and/or Area may cooperatively share the costs and services of a librarian who shall facilitate sharing of the combined available resources among the cooperating schools in accordance with the following ratios:

School Enrollment (ADM)

Up to 100 - 1/5 time librarian

101-200 - 1/5 time librarian and 1/2 time library aide or 20 hours of library activity

201-400 - 1 full-time librarian or 2/5 time librarian provided the school has a full-time library aide

401 + - 1 full-time librarian and a full-time library aide

Requirement Met

Non-Compliance

Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Absence of Librarian Services:** The school does not currently have a librarian to service the library media center. Although the current school enrollment is less than 100 students, which would typically require at least a part-time librarian, the absence of a librarian limits the functionality and effectiveness of the library media center.

Actions Taken	The librarian position was posted and selected with a tentative job offer; however, the offer was rescinded due to the federal hiring freeze.
Challenges Faced	The resignation of the contracted librarian at the beginning of the school year has created a gap in library services. While the school successfully posted and selected a new librarian, the federal hiring freeze has impeded the filling of that position, leaving the library without necessary oversight and support.
Recommendations	<ol style="list-style-type: none"> 1) If hiring a librarian immediately is not feasible, consider appointing a qualified staff member to manage library operations temporarily. This person can help maintain the library and provide limited services until a permanent librarian can be hired. 2) Engage with the community and parents to identify volunteers or local resources that may assist in providing library services or enhancing student access to library materials while waiting for a permanent librarian to be hired.

Legal Citation: §36.40(a)(4)

(4) All libraries must conduct an annual inventory of available books, materials, and equipment in accordance with the acquisitions and selection policies

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Annual Inventory:** HES has not conducted an annual inventory of available books, materials, and equipment, which is essential for ensuring compliance with acquisition and selection policies.

Actions Taken	The school does have a library inventory system that can be utilized for tracking materials that are checked out, but this system has not been leveraged for a comprehensive inventory assessment.
Challenges Faced	The resignation of the contracted librarian at the beginning of the school year has left a gap in library services. Although the school was able to post and select a new librarian, the federal hiring freeze has delayed the filling of that position.
Recommendations	<ol style="list-style-type: none">1) Organize a manual inventory with willing staff members to assess the condition, relevance, and appropriateness of existing materials for the student population. This can involve:<ul style="list-style-type: none">• Forming small teams to focus on specific sections of the library.• Creating a checklist that includes the condition of each item, its relevance to current curriculum standards, and its appropriateness for the grade level.

25 CFR §36.41, Standard XIV - Textbooks

25 CFR § 36.41, Standard XIV - Textbooks falls under Subpart E - Instructional Support. There are three core requirements assessed under § 36.41.

During this assessment, it was determined that 1 out of 3 requirements were met, resulting in 2 out of 3 requirements being non-compliant. For the applicable requirements, HES has achieved a 33% compliance rate for §36.40. This marks an improvement from the initial assessment, which indicated a zero percent compliance rate for this regulation.

<p>Legal Citation: §36.41(a)</p> <p>(a) Each school shall establish a textbook review committee composed of teachers, parents, and students, and school board members. Appointment to the textbook review committee shall be subject to school board approval.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- Lack of Textbook Review Committee:** HES has not established a textbook review committee composed of teachers, parents, students, and school board members, which is necessary for compliance with the required standards.

Actions Taken	HES now has an active school board and has adopted the Savvas curriculum for Math, English Language Arts, Science, and Social Studies, which shows progress in curriculum adoption but does not address the formation of a textbook review committee.
Challenges Faced	Since the initial assessment, HES has made efforts to establish a school board and implement a selected curriculum. However, the school leadership requires additional resources and support to establish a functional textbook review committee that can effectively achieve its objectives.
Recommendations	<ol style="list-style-type: none"> 1) Work with the ADD-BOS curriculum and instruction education specialist to acquire resources for textbook review from the West Ed curriculum mapping project. This collaboration can provide valuable tools and guidelines for the effective review and selection of instructional materials. 2) Organize training sessions for committee members focused on textbook evaluation criteria and best practices. Equip the committee with tools and materials that outline effective review processes to ensure thorough evaluations of the curriculum.

Legal Citation: §36.41(b)

(b) The textbook review committee shall establish a procedure and criteria for the annual review of textbooks and other materials used to complement instruction. The criteria shall include, but not be limited to, the following:

- (1) The textbooks content shall meet the course objectives which are within the adopted school curriculum.
- (2) The textbooks shall, as much as possible, reflect cultures accurately.
- (3) The textbooks shall be current, in good physical condition, and varied in reading levels.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Absence of a Textbook Review Committee:** HES has not established a textbook review committee for the annual review of textbooks and other materials used to complement instruction. This sub-regulation is contingent upon the establishment of a textbook review committee, which has yet to be formed.

Actions Taken	HES now has an active school board and has adopted the Savvas curriculum for Math, English Language Arts, Science, and Social Studies, representing progress in curriculum adoption but not fulfilling the requirement for a functioning textbook review committee.
Challenges Faced	Since the initial assessment, HES has made efforts to establish a school board and implement a selected curriculum. However, the school leadership requires additional resources and support to establish a functional textbook review committee that can effectively achieve its objectives.
Recommendations	<ol style="list-style-type: none">1) Work with the ADD-BOS curriculum and instruction education specialist to acquire resources for textbook review from the West Ed curriculum mapping project. This collaboration can provide valuable tools and guidelines for the effective review and selection of instructional materials.2) Organize training sessions for committee members focused on textbook evaluation criteria and best practices. Equip the committee with tools and materials that outline effective review processes to ensure thorough evaluations of the curriculum.

Legal Citation: §36.41(c)

(c) Each school shall equitably distribute instructional materials to all classrooms. Each school shall inventory all property and equipment annually prior to requisitioning additional materials. Copies of the inventory shall be kept on file by the school staff.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as compliant with this regulation for the following reasons:

- **Equitable Distribution of Instructional Materials:** HES has a designated teacher who serves as the curriculum coordinator for the school. This coordinator has worked actively to distribute curriculum and instructional materials to all teachers.
- **Inventory Management:** The curriculum coordinator created a spreadsheet inventory of the materials distributed to each classroom, which is accessible on the school SharePoint site. This proactive approach ensures that instructional materials are tracked and managed effectively.

25 CFR §36.42, Standard XV - Counseling Services

25 CFR § 36.42, Standard XV - Counseling Services falls under Subpart E - Instructional Support. There are sixteen core requirements assessed under § 36.42.

During this assessment, it was determined that 7 out of 16 requirements were met, and 1 out of 16 was not applicable resulting in 8 out of 16 requirements being non-compliant. For the applicable requirements, HES has achieved a 46.67% compliance rate for §36.42. This marks an improvement from the initial assessment, which indicated a 28.57% compliance rate for this regulation.

<p>Legal Citation: §36.42</p> <p>Each school shall offer student counseling services concerned with physical, social, emotional, intellectual, and vocational growth for each individual. Counseling services shall be included in a school-wide assessment program.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Interruption of Counseling Services:** For most of the 2024-2025 school year, the school counselor was assigned to teach in a 3rd/4th grade classroom. After resigning on December 11, 2024, a new counselor was appointed and started on December 17, 2024. During the period when the school counselor was assigned to teaching duties, no counseling services were provided, which significantly impacted the emotional and social support available to students.
- **Uncertainty in Comprehensive Support:** Although the new counselor is now teaching Social-Emotional Learning (SEL) classes, it remains unclear whether the new school counselor is adequately addressing all areas of student support, including physical, social, emotional, intellectual, and vocational growth as required by the regulation. This uncertainty necessitates further evaluation of the services being provided.

Actions Taken	HES adopted the Character Counts curriculum for use during SEL classes, which the new counselor started implementing immediately after her arrival in December. During the period when the school counselor was assigned to teach, the school principal and special education teacher took on the responsibilities of testing coordinators.
Challenges Faced	Due to extended teacher absences, HES had to assign the school counselor to a teaching position for most of the school year. As a result, no counseling services were provided during the first half of the school year, impacting the support available for students' emotional and social needs. In addition, the school experienced delays in contracting services and lacked housing for contracted service providers.
Recommendations	<ol style="list-style-type: none"> 1) Conduct staffing needs assessment to ensure that counseling services are not disrupted in the future due to teacher absences. Consider hiring additional support staff or developing a contingency plan to allocate responsibilities effectively. 2) Provide ongoing training opportunities for all teachers and staff involved in delivering SEL programs, so they are equipped to support students' emotional needs, especially during times when the school counselor may have teaching responsibilities.

Legal Citation: §36.42(a)(1)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
- (1) Each Spring, schools shall conduct testing for grades 4, 8, and 12 using a current version of a standardized academic achievement test based upon the national assessment standards designed to assess higher order thinking skills. All schools shall keep a current record, with the Office of Indian Education Programs, of the test the school administers each Spring and the testing dates.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School successfully conducted testing in the spring of 2024 for all required grade levels by administering the BIE assessment. Records related to the assessment are managed by the BIE Chief Academic Office. Additionally, the school is on track to administer the BIE assessment again in the spring of 2025. This demonstrates compliance with the assessment requirements specified in the regulation, ensuring that academic performance is objectively measured for students in the mandated grades.

Legal Citation: §36.42(a)(2)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
- (2) Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School has met the requirements of this regulation by incorporating a performance-based assessment as part of the summative assessment administered in the spring through the BIE assessment. This design aims to evaluate students' understanding and application of knowledge through practical tasks, thereby enhancing the overall assessment of student learning outcomes. This approach not only complements standardized achievement testing but also provides a more comprehensive evaluation of student performance.

Legal Citation: §36.42(a)(3)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
- (3) Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School has successfully met the requirements of this regulation. As HES administers the BIE assessment, the results are managed and reported by the BIE Chief Academic Office. The Principal of HES reported the results of the BIE assessment during the school board meeting held on October 15, 2024. This proactive reporting of assessment results ensures transparency and accountability regarding student performance and assessment outcomes within the school community, thereby facilitating informed decision-making and ongoing improvements in educational practices.

Legal Citation: §36.42(a)(4)

- (b) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
- (4) Parents/guardians shall be informed of their children's assessment results and provided with an explanation and interpretation to ensure adequate understanding of the results.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School has successfully met the requirements of this regulation. The assessment results for the BIE assessment were mailed to parents in the fall. The report included an explanation and interpretation of the results, ensuring that parents/guardians have an adequate understanding of their children's performance. This practice fosters engagement between the school and families, supporting informed discussions on student progress and areas for improvement.

Legal Citation: §36.42(a)(5)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
 - (5) Each school's instructional program shall establish an ongoing student academic assessment program to ensure that defined assessment procedures are in place. The program shall include regular training in basic assessment procedures and routines for all teachers and other staff involved in student assessment.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School has successfully established an ongoing student academic assessment program that ensures defined assessment procedures are in place. Although the school counselor is designated as the school testing coordinator, there were periods when the counselor was unable to perform these duties due to being assigned to a classroom. During those times, the principal and a special education teacher stepped in as co-testing facilitators, ensuring continuity in assessment responsibilities.

HES is actively participating in both interim and summative BIE assessments scheduled for the spring. To prepare staff for these assessments, the school conducted a Testing Prep and Training session during the staff meeting on October 17, 2024. Additionally, plans are in place to host another preparation session to ensure staff readiness for the upcoming spring testing. This structured approach demonstrates commitment to effective assessment practices and ongoing professional development for all staff involved in student evaluations.

Legal Citation: §36.42(a)(6)

- (a) Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance. Required formal tests shall be administered annually to all regular program students in grades 4, 8, and 12. (The testing of special education and gifted/talented students shall be in accordance with respective regulations.) If required by state certification standards, schools may use the state mandated academic achievement tests and accompanying requirements. These formal tests and their subtest contents, as well as the test-related procedures, shall include, but not be limited to, the following:
 - (6) Each Agency and Area, as appropriate, shall report the results of each school's formal Spring tests to the Office of Indian Education Programs by August 1 of each year. Summative information from performance-based and authentic assessments shall be reported at the same time.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School has successfully met the requirements outlined in this regulation. As HES administers the BIE assessment, the results are managed and reported by the BIE Chief Academic Office. This ensures that the results of the formal spring tests are communicated to the Office of Indian Education Programs by the designated deadline of August 1 each year. Additionally, summative information from performance-based and authentic assessments is incorporated into this reporting process, demonstrating adherence to the assessment reporting requirements.

Legal Citation: §36.42(b)(1) - Each counseling program shall provide the following:

(1) Each school having a minimum school ADM of 200 students shall make provisions for the full-time professional services of a counselor, and each school enrolling fewer than 200 students shall make provisions for a part-time professional counselor.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Interruption of Counseling Services:** For most of the 2024-2025 school year, the school counselor was assigned to teach in a 3rd/4th grade classroom. After resigning on December 11, 2024, a new counselor was appointed and started on December 17, 2024. During the period when the school counselor was assigned to teaching duties, no counseling services were provided, impacting the emotional and social support available for students.

Actions Taken	HES adopted the Character Counts curriculum for use during SEL classes, which the new counselor started implementing immediately after her arrival in December.
Challenges Faced	Due to extended teacher absences, HES had to assign the school counselor to a teaching position for most of the school year. As a result, no counseling services were provided during the first half of the school year, impacting the support available for students' emotional and social needs. In addition, the school experienced delays in contracting services and lacked housing for contracted service providers.
Recommendations	<ol style="list-style-type: none"> 1) Conduct staffing needs assessment to ensure that counseling services are not disrupted in the future due to teacher absences. Consider hiring additional support staff or developing a contingency plan to allocate responsibilities effectively. 2) Provide ongoing training opportunities for all teachers and staff involved in delivering SEL programs, so they are equipped to support students' emotional needs, especially during times when the school counselor may have teaching responsibilities.

Legal Citation §36.42(b)(2) - Each counseling program shall provide the following:

(2) The counselors shall be familiar with the unique tribal, social, and economic characteristics of students.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Formal Integration in the Counseling Program:** Since the initial assessment, HES has had three school counselors working with the students. In conversations with each counselor, some expressed that they had read books about the community and took the initiative to learn more about the unique tribal, social, and economic characteristics of the students. However, this initiative is not formally integrated into the HES counseling program, and there are no materials or information readily provided to support the counselors in understanding these essential aspects of the student population.

Actions Taken	HES has not yet taken steps to address this requirement, leaving a gap in the counseling program's effectiveness.
Challenges Faced	HES has lacked a cohesive counseling program for most of the 2024-2025 school year. This deficiency has hindered the effectiveness of counseling services provided to students. Moreover, the school needs resources that focus on the unique tribal, social, and economic characteristics of its student population. These resources are essential to develop training materials and references that would adequately support the school counselors in their roles, enabling them to better understand and meet the needs of their students.
Recommendations	<ol style="list-style-type: none"> 1) Work collaboratively with school board members to create required induction materials for the school counselors. These materials should focus on familiarizing counselors with the unique tribal, social, and economic characteristics of the students at Havasupai Elementary School. 2) Compile and provide access to materials, books, and resources that specifically address the community's cultural context, ensuring that counselors have the information they need to effectively support their students. Add these materials to the library's professional collection for all staff members to access. 3) Establish feedback opportunities for students and parents to share their experiences with the counseling program, which can help identify areas for improvement and ensure that the program meets the community's needs.

Legal Citation §36.42(b)(3)(i) - The counseling program shall contain the following:

(3) (i) A written referral procedure;

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School has successfully met the requirements of this regulation for the following reasons:

- **Implementation of Written Referral Procedure:** HES has implemented a written referral procedure developed with the assistance of the ADD-BOS Behavioral Health Specialist. This procedure includes specific steps for making referrals related to student behavior and support. The Behavioral Health Specialist provided training to the staff and shared relevant materials and forms to facilitate the effective use of this referral system.
- This structured approach aims to enhance student support services and ensure that behavioral concerns are addressed in a consistent and informed manner, thereby improving the overall effectiveness of the counseling program.

Legal Citation §36.42(b)(3)(ii) - The counseling program shall contain the following:

(ii) Counseling techniques and documentation procedures to provide for the career, academic, social, and personal needs of the students which are based on the cultural beliefs and values of the students being served;

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasapai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Counseling Documentation Procedures:** HES currently lacks program policies or procedures for documentation related to counseling, including counseling plans, forms, logs, or progress reports. Although HES utilizes the Character Counts curriculum in its Social-Emotional Learning (SEL) classes, this curriculum does not align with the cultural beliefs and values of the students being served.

Actions Taken	HES has not yet taken steps to address this requirement, leaving a gap in the counseling program's effectiveness.
Challenges Faced	HES has lacked a cohesive counseling program for most of the 2024-2025 school year. This deficiency has hindered the ability to provide structured support to students, affecting their career, academic, social, and personal development.
Recommendations	<ol style="list-style-type: none"> 1) The school counselor should work closely with the ADD-BOS Behavioral Health Specialist to develop the necessary materials and mechanisms for documentation. This collaboration can include: <ul style="list-style-type: none"> • Creating standardized counseling plans that detail students' goals and the strategies to achieve them. • Designing progress report templates that track student growth in academic, social, and personal areas. • Establishing logging procedures for documenting counseling sessions, including topics discussed and any follow-up actions needed. 2) Engage with community members and cultural leaders to adapt or supplement the existing Character Counts curriculum, ensuring that the SEL program reflects the unique cultural beliefs and values of the students at HES.

Legal Citation §36.42(b)(3)(iii) - The counseling program shall contain the following:

(iii) Preventative and crisis counseling on both individual and group bases;

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Insufficient Counseling Services:** Currently, the counselor offers Social-Emotional Learning (SEL) classes and has limited time (35 minutes twice a week) for individual counseling. The program has been in place for less than two months and will be reassessed to examine scheduling and counseling logs to gauge its effectiveness. However, the current structure does not adequately provide for preventative and crisis counseling on both individual and group bases.

Actions Taken	HES has developed a schedule for the counselor to conduct SEL classes, provide classroom support, and hold some individual counseling sessions.
Challenges Faced	HES has lacked a cohesive counseling program for most of the 2024-2025 school year, which has hindered the ability to provide structured support to students. The limited time allocated for individual counseling may not adequately address the needs for both preventative and crisis counseling.
Recommendations	<ol style="list-style-type: none"> 1) Consider increasing the frequency and duration of individual counseling sessions to ensure that students have adequate access to both preventative and crisis counseling. Allocating more hours per week specifically for individual therapy is essential to better support students' needs. 2) Create a detailed counseling plan that outlines specific objectives for both individual and group counseling sessions. This plan should encompass objectives for preventative measures and crisis intervention strategies, tailored to the student population.

Legal Citation §36.42(b)(3)(iv) - The counseling program shall contain the following:

(iv) Confidentiality and security of counseling records for each student; and

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Secure Storage for Counseling Records:** The counseling program currently lacks a locking file cabinet, which is essential for maintaining the confidentiality and security of student counseling records. This absence poses a significant risk to the protection of sensitive information.

Actions Taken	The school principal has made efforts to locate a locking file cabinet on campus but has been unable to find one that is not already being utilized.
Challenges Faced	The absence of a dedicated locking file cabinet for the counselor limits the ability to securely store confidential student information, putting the program in non-compliance with the legal requirement.
Recommendations	<ol style="list-style-type: none"> 1) Acquire a locking file cabinet specifically for the school counselor to ensure the secure storage of student counseling records. This will help maintain confidentiality and comply with regulations. 2) Develop and implement security procedures for handling and storing counseling records. This should include protocols for access, usage, and disposal of student information to ensure ongoing confidentiality. 3) Identify a secure area within the counselor's workspace where the locking file cabinet will be placed. This area should have restricted access to maintain the confidentiality of student records. 4) Provide training for the school counselor and any staff involved in handling counseling records on confidentiality practices. This training should cover legal obligations regarding student privacy and the importance of maintaining secure records.

Legal Citation §36.42(b)(3)(v) - The counseling program shall contain the following:

(v) Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Orientation Programs:** HES has not designed and implemented orientation programs to facilitate the transition from elementary to junior high/middle school and from junior high/middle school to high school.

Actions Taken	The school hosted a Boarding School Fair at the end of the 2023-2024 school year to provide 8th graders with information about their options for high school. While this is a positive step, it does not encompass a comprehensive orientation program.
Challenges Faced	HES has lacked a cohesive counseling program for most of the 2024-2025 school year, resulting in inadequate structured support for students during critical transitional periods.
Recommendations	<ol style="list-style-type: none"> 1) Collaborate with school counselors and high school representatives to define the necessary steps that 8th graders must complete before transitioning to high school. This may include: <ul style="list-style-type: none"> • Attending orientation sessions. • Completing applications for high schools. • Visiting potential high schools. • Meeting with counselors to discuss academic plans. • Submitting any necessary paperwork (e.g., transcripts, recommendation letters). 2) Create a user-friendly tracker (digital or paper-based) that allows 8th graders to monitor their progress. Include sections for: <ul style="list-style-type: none"> • Task descriptions. • Deadlines for each step. • Spaces for student signatures or verification by counselors/teachers. • Checkboxes to indicate completion of each task. 3) Host informational meetings for parents and guardians, detailing the transition process and what to expect at each level. Providing resources and support for families can enhance student readiness and comfort level.

Legal Citation §36.42(b)(3)(vi) - The counseling program shall contain the following:

(vi) Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests. Additionally, counselors will assist high school students in selecting courses which satisfy the school's and the state's graduation requirements and the student's academic and career plan. Further, seniors will be given aid in completing registration and/or financial assistance applications for either vocational or academic post-secondary institutions.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Academic Counseling:** HES has not had a counseling program for most of the 2024-2025 school year, primarily due to the counselor being assigned as a classroom teacher. As a result, 7th and 8th-grade students have not received academic counseling to develop written academic and career plans based on their abilities, aptitudes, and interests.

Actions Taken	HES has not yet taken steps to address this requirement, leaving a gap in the counseling program's effectiveness.
Challenges Faced	HES has lacked a cohesive counseling program for most of the 2024-2025 school year, which has resulted in inadequate structured support for students, specifically in the area of academic counseling.
Recommendations	<ol style="list-style-type: none"> 1) Establish a system to ensure that each junior and middle school student receives academic counseling at least twice a year. This should include: <ul style="list-style-type: none"> • Scheduled individual meetings for students to develop their academic and career plans. • Group sessions where students can explore various careers and academic options.

Legal Citation §36.42(b)(3)(vii) - The counseling program shall contain the following:

(vii) Each high school counseling program shall be required to have on file for each student a planned academic program of studies which is available from the regular course offerings of the school to meet the student's career objectives and which will show that the student has received counseling.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES is a K-8 school and does not operate a high school; therefore, this regulation is not applicable.

25 CFR §36.43, Standard XVI - Student Activities

25 CFR § 36.43, Standard XVI - Student Activities falls under Subpart E - Instructional Support. There are ten core requirements assessed under § 36.43.

During this assessment, it was determined that 1 out of 10 requirements were met, 4 out of 10 are not applicable resulting in 5 out of 10 requirements being non-compliant. For the applicable requirements, HES has achieved a 16.67% compliance rate for §36.40. This remains unchanged from the 2024 initial assessment, which indicated that HES had a compliance rate of 16.67% for this regulation.

Legal Citation: §36.43

All schools shall provide and maintain a well-balanced student activities program based on assessment of both student and program needs. Each activity program shall help develop leadership abilities and provide opportunities for student participation but not be limited to activities that include special interest clubs, physical activities, student government, and cultural affairs. The activity program shall be an integral part of the overall educational program.

Requirement Met
 Non-Compliance
 Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- Lack of a Well-Balanced Student Activities Program:** HES does not provide a well-balanced student activities program based on a thorough assessment of both student and program needs. Although the school board approved stipends for various club activities, the only extracurricular activities currently offered are a Native Language and Culture club and a Saturday school program focusing on reading, math, and writing. HES has not conducted assessments to inform programming decisions regarding student interests and needs.

Actions Taken	In the spring of 2024, HES offered several extracurricular activities, including basketball, Dream Keepers, a music club, and started a student council. However, these programs were not reinstated for the current school year.
Challenges Faced	The school has faced challenges due to staff turnover and extended absences, resulting in some of the staff who sponsored activities last year no longer being available. Additionally, HES lacks comprehensive activity plans to guide the development and implementation of student programs.
Recommendations	<ol style="list-style-type: none"> 1) Implement a systematic assessment to gather data on student interests, preferences, and needs regarding extracurricular activities. This can be done through questionnaires, focus groups, or student forums to ensure that the offerings align with what students want to participate in. 2) Create a detailed activity plan that outlines potential clubs and programs based on the results of the needs assessment. This plan should include objectives, resources needed, and strategies for implementation.

Legal Citation: §36.43(a)

All student activities shall be required to have qualified sponsors and be approved by the school supervisor, and the school board shall approve the overall activity plan. A qualified sponsor is a professional staff member of the school that is given responsibility to provide guidance or supervision for student activities.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Comprehensive Activity Plan:** Currently, the only extracurricular activity at HES is the Native Language and Culture Club, which does have a qualified sponsor approved by the school supervisor. However, HES is rated as non-compliant with this regulation because, despite the school board approving the stipend list, there is no comprehensive activity plan that meets the required elements outlined in part (b), such as purpose, structure, coordination, and planned types of fundraising activities.

Actions Taken	HES has an active school board that meets regularly and has identified potential activities on an approved stipend list for the 2024-2025 school year.
Challenges Faced	The school has faced challenges due to staff turnover and extended absences, resulting in some of the staff who sponsored activities last year no longer being available. Additionally, HES lacks comprehensive activity plans to guide the development and implementation of student programs.
Recommendations	<ol style="list-style-type: none">1) Develop and disseminate guidelines for staff on how to propose new activities, ensuring that proposals include necessary elements such as objectives, required resources, and volunteer support.2) Actively recruit staff members to serve as sponsors for additional extracurricular activities. Provide training and support to ensure they are equipped to manage and guide student activities effectively.

Legal Citation: §36.43(b)

A plan of student activity operations shall be submitted, by each activity at the beginning of each school year, to the school supervisor. The plan will include the purpose, structure, coordination, and planned types of fund-raising activities.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Submitted Activity Plans:** The HES staff handbook provides guidance regarding the opportunity to sponsor extracurricular activities; however, there are no further expectations or requirements communicated for potential activity sponsors. HES is rated as non-compliant due to the lack of submitted plans for student activity operations, which are necessary for effectively organizing and managing school activities.

Actions Taken	HES has an active school board that meets regularly and has identified potential activities on an approved stipend list for the 2024-2025 school year.
Challenges Faced	There was no template or established format for a school activity operations plan created for HES. The administration will need to create guidance and incorporate it into the staff handbook.
Recommendations	<ol style="list-style-type: none">1) Develop a standardized template for student activity operations plans. This template should include specific sections for the purpose, structure, coordination, and planned types of fundraising activities.2) Revise the staff handbook to include detailed expectations and guidelines for potential sponsors of extracurricular activities. Ensure that the new guidelines clarify the requirements for submitting activity plans.3) Set clear deadlines for activity sponsors to submit their plans at the beginning of each school year. This will help ensure that all plans are collected in a timely manner and reviewed by the school supervisor.

Legal Citation: §36.43(c)

School may participate in interscholastic sports and activities on an informal or formal basis. On an informal basis, the Bureau-operated schools will coordinate with other schools in setting up a schedule of sports and games. Schools that participate in state-recognized leagues will abide by those state rules regulating inter-school competition.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This regulation is rated as not applicable to HES because the school does not participate in interscholastic sports and activities. The school's remote location presents challenges regarding transportation, making it impractical for HES to engage with state-recognized leagues or other schools for competitive sports.

Legal Citation: §36.43(d)

Until comparable competitive opportunities are provided to all students, regardless of sex, no student shall be barred from participation in interscholastic competition in noncontact sports except on the basis of individual merit.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This regulation is rated as not applicable to HES because the school does not participate in interscholastic sports and activities.

Legal Citation: §36.43(e)

Residential schools shall plan and provide an intramural program for all students. The program shall include a variety of scholastic and sport activities.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This regulation is rated as not applicable to HES because the school does not operate a residential program.

Legal Citation: §36.43(f)

Students shall be involved only in activities which are sanctioned by the school.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This requirement is met by HES because the school offers the Native Language and Culture program and Saturday School, both of which are sanctioned activities that have been approved by the school administration. This ensures that students are engaged in structured and supervised educational experiences that align with the school's objectives.

Legal Citation: §36.43(g)

All student activities involved only in fund raising are required to establish a school/student activity bank account following school/student banking procedures outlined under 25 CFR 31.7. All student activity accounts shall be audited annually.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This requirement is not applicable to HES at this time because there are currently no student activities that involve fundraising activities, and consequently, there are no student activity accounts to audit. The school does not have any established fundraising initiatives that would necessitate the creation of a bank account for student activities.

Legal Citation: §36.43(h) - The school shall provide for the safety and welfare of students participating in school-sponsored activities.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Absence of Documented Activity Procedures and Guidelines:** HES is rated as non-compliant due to the lack of documented activity procedures and guidelines for school-sponsored activities. While the school handbook includes general guidelines for activity approval and stipend information, it does not provide specific expectations, protocols, or safety measures for sponsors, nor does it ensure the safety and welfare of students involved in such activities.

Actions Taken	HES administration has reviewed and revised the student and staff handbooks to include school-wide rules and procedures applicable while on campus or at school-sponsored activities. This represents a step towards addressing safety and welfare concerns but does not fully meet the requirements of the regulation.
Challenges Faced	There is no existing template for a school activity operations plan within HES. The administration will need to create comprehensive guidance to be incorporated into the staff handbook.
Recommendations	<ol style="list-style-type: none"> 1) Create a comprehensive set of documented procedures and guidelines for all school-sponsored activities that specifically address safety and welfare protocols. This might include: <ul style="list-style-type: none"> • Risk assessment forms. • Emergency response plans. • Supervision requirements. 2) Develop a communication plan that informs students and parents about safety procedures associated with school-sponsored activities. This should include orientation sessions or informational brochures that outline expectations.

Legal Citation: §36.43(i)

Each sponsor of a student activity will be given orientation and training covering the responsibilities of a sponsor by the school supervisor.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:

- **Lack of Orientation and Training for Activity Sponsors:** HES is rated as non-compliant because the school has not provided orientation and training regarding the responsibilities of activity sponsors by the school supervisor. Additionally, the school lacks documented procedures and guidelines for school-sponsored activities.

Actions Taken	HES administration has conducted an orientation for all teachers covering expectations as staff members, which includes school-wide rules and procedures applicable while on campus or during school-sponsored activities. While this is a positive step towards addressing overall school expectations, it does not fully fulfill the specific requirements of training activity sponsors.
Challenges Faced	The lack of documented procedures and comprehensive guidelines for school-sponsored activities hinders the ability to provide focused training for sponsors and clarify their specific responsibilities.
Recommendations	<ol style="list-style-type: none">1) Develop a comprehensive set of documented procedures and guidelines specifically for school-sponsored activities. This should outline the responsibilities of sponsors, including planning, supervision, safety protocols, and communication with students and parents.2) Design an orientation program for new activity sponsors that covers:<ul style="list-style-type: none">• Expectations and responsibilities.• Safety and emergency procedures.• Resource availability and support from administration.• Include elements of hands-on training where possible, simulating scenarios that sponsors might encounter.3) Organize regular training sessions for all sponsors, both new and existing, to review responsibilities and address any changes in policies or procedures. This could be part of a broader staff development program.

25 CFR §36.50, Standard XVII - School Program Evaluation and Needs Assessment

25 CFR § 36.50 Standard XVII - School Program evaluation and needs assessment falls under Subpart F - Evaluation of Educational Standards. There are three core requirements assessed under § 36.50.

During this assessment, it was determined that 3 out of 3 requirements were met, resulting in 0 out of 3 requirements being non-compliant. For the applicable requirements, HES has achieved a 100% compliance rate for §36.50. This remains unchanged from the 2024 initial assessment, which indicated that HES had a compliance rate of 100% for this regulation.

Legal Citation: §36.50

Each school shall complete a formal, formative evaluation at least once every seven (7) years beginning no later than the second complete school year following the effective date of this part. Schools shall follow state and/or regional accreditation, or accreditation requirements equal to the state in which a school is located. Each school shall follow the prescribed evaluation cycle. The primary purpose of this evaluation will be to determine the effects and quality of school programs and to improve the operations and services of the school programs.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES met this requirement because, in October 2024, following a formal formative evaluation, HES received district accreditation along with the Phoenix Education Resource Center from Cognia. Additionally, HES completed school-level accreditation through Cognia during the 2022-2023 school year.

Legal Citation: §36.50(a)

(a) Each school's evaluation design or model will provide objective and quantitative analysis of each area to be evaluated. The analysis shall include product and process evaluation methods. The areas to be reviewed will include, but not be limited to, the following:

- (1) School philosophy and objectives.
- (2) Administrative and organizational requirements.
- (3) Program planning and implementation.
- (4) Curriculum development and instruction.
- (5) Primary education.
- (6) Program of studies for elementary, junior high/middle, and high schools.
- (7) Grading requirements.
- (8) Promotion requirements.
- (9) High school graduation requirements.
- (10) Library/media.
- (11) Textbooks and other instructional materials.
- (12) Counseling services.
- (13) Medical and health services.
- (14) Student activities.
- (15) Transportation services.
- (16) Staff certification and performance.
- (17) Facilities (school plant).
- (18) Parent and community concerns.
- (19) School procedures and policies.
- (20) School board operations.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES met this requirement because, in October 2024, following a formal formative evaluation, HES received district accreditation along with the Phoenix Education Resource Center (ERC) from Cognia. Additionally, HES completed school-level accreditation through Cognia during the 2022-2023 school year. Through Cognia's evaluation process, the areas outlined in this regulation are reviewed.

Legal Citation: §36.50(b)- The Director, within six (6) months from the effective date of this part, shall distribute to each school, Agency, or Areas appropriate, a standardized needs assessment and evaluation instrument with guidelines for developing and applying a locally appropriate evaluation model for carrying out the requirements of this standard.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES has met this requirement because the Bureau of Indian Education (BIE) utilizes the Plan 4 Learning platform to complete the BIE OnePlan. This OnePlan includes a process for creating a school improvement plan, which encompasses a comprehensive needs assessment, root cause analysis, SMART goals, a program plan, and a budget. The OnePlan is reviewed by the Education Resource Center (ERC) staff and leadership, as well as the Division of Performance and Accountability.

25 CFR §36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities

25 CFR § 36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities falls under Subpart F - Evaluation of Educational Standards. There are five core requirements assessed under § 36.51.

During this assessment, it was determined that 1 out of 5 requirements were met, 1 out of 5 was not applicable resulting in 3 out of 5 requirements being non-compliant. For the applicable requirements, HES has achieved a 25% compliance rate for §36.51. This remains unchanged from the 2024 initial assessment, which indicated that HES had a compliance rate of 25% for this regulation.

<p>Legal Citation: §36.51(a)</p> <p>The Office of Indian Education Programs shall monitor and evaluate the conformance of each Agency or Area, as appropriate, and its schools with the requirements of this part. In addition, it shall annually conduct onsite monitoring at one-third of the Agencies and Areas, thereby monitoring onsite each Agency and/or Area at least once every three (3) years. Within 45 days of the onsite visit, the Director shall issue to each Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, a written report summarizing the monitoring findings and ordering, as necessary, required actions to correct noted deficiencies.</p>
<p><input type="checkbox"/> Requirement Met</p> <p><input checked="" type="checkbox"/> Non-Compliance</p> <p><input type="checkbox"/> Not Applicable</p>

Finding:

This regulation is rated as non-compliant because the Director’s Office has not fully monitored and evaluated the conformance of the Education Resource Center (ERC) and its schools with the requirements set forth under 25 C.F.R. Part 36. Although the BIE Director’s Office conducts various forms of monitoring and evaluations, including ISEP reviews and programmatic and fiscal monitoring, HES has not been adequately monitored and evaluated against the outlined requirements.

Actions Taken	The Chief Performance Office for BIE will facilitate onsite monitoring for Havasupai Elementary School in the Fall of 2025, with a commitment to continue monitoring every three years.
Challenges Faced	Currently, there does not seem to be a holistic evaluation and monitoring process in place that reviews, monitors, and assesses all the subparts of 25 C.F.R. Part 36 at HES. This lack of a structured evaluative framework may hinder the school's ability to ensure compliance across all necessary areas outlined in the regulations.
Recommendations	1) Develop an overarching evaluation and monitoring framework that addresses all subparts of 25 C.F.R. Part 36. This framework should outline roles, responsibilities, and processes for regular assessment of compliance areas.

Legal Citation: §36.51(b)

Each Agency or Area, as appropriate, in conjunction with its school board shall monitor and evaluate the conformance of its school with the requirements of this part through an annual onsite evaluation involving one-third of the schools annually, thereby monitoring onsite each school at least once every three (3) years. Within 30 days of the onsite visit, the Agency Superintendent for Education or Area Education Programs Administrator, as appropriate, shall issue to the local school supervisor and local school board a written report summarizing the findings and ordering, as necessary, required actions to correct noted deficiencies.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This regulation is rated as non-compliant because the Education Resource Center (ERC) does not conduct onsite evaluations of HES to assess conformance with the requirements of 25 C.F.R. Part 36 through the mandated annual onsite evaluation or at least once every three years. Although the ERC performs ISEP monitoring every Fall and Spring for funding requirements associated with 25 CFR Part 39, this review does not encompass programmatic evaluations required by the regulation.

Actions Taken	The Chief Performance Office for BIE will facilitate onsite monitoring for Havasupai Elementary School in the Fall of 2025, with a commitment to continue monitoring every three years. HES also now has an active school board that will be invited to participate in the monitoring through interviews and in the exit conference.
Challenges Faced	Currently, there does not seem to be a holistic evaluation and monitoring process in place that reviews, monitors, and assesses all the subparts of 25 C.F.R. Part 36 at HES. This lack of a structured evaluative framework may hinder the school's ability to ensure compliance across all necessary areas outlined in the regulations.
Recommendations	1) Develop an overarching evaluation and monitoring framework that addresses all subparts of 25 C.F.R. Part 36. This framework should outline roles, responsibilities, and processes for regular assessment of compliance areas.

Legal Citation: §36.51(c)

Schools, Agencies, and Areas shall keep such records and submit to the responsible official or designee accurate reports at such times, in such form, and containing such information as determined by that official to be necessary to ascertain conformance with the requirements of this part.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

This requirement is not applicable at this time. The requirements outlined in §36.51(a) and §36.51(b) need to be met for §36.51(c) to apply. As such, these two subsections are dependencies for this requirement. Currently, there is no report available to ascertain conformance with the requirements of Part 36.

Legal Citation: §36.51(d)

Schools, Agencies, and Areas shall permit access for examination purposes by the responsible official, or any duly authorized designee, to any school records and other sources of information which are related or pertinent to the requirements of this part.

- Requirement Met
- Non-Compliance
- Not Applicable

Finding:

HES has successfully met this requirement by ensuring that its records are available for examination purposes. The school has implemented several systems to facilitate this process:

- **School SharePoint Site:** HES has created a SharePoint site where it houses documents and evidence that demonstrate conformance with relevant regulations.
- **NASIS (Native American Student Information System):** The school uses NASIS to manage essential records, including attendance, grades, and student information.
- **Onsite Visits:** During onsite visits, HES makes all necessary records and documentation available to authorized personnel as needed.

Legal Citation: §36.51(e)- The Office of Indian Education Programs, Agency Superintendent for Education, or Area Education Programs Administrator, as appropriate, shall annually conduct a summative evaluation to assess the degree to which each Bureau educational policy and administrative procedure assists or hinders schools in complying with the requirements of this part. This will include, but not be limited to, the following actions:

- (1) Evaluate current policies and practices not related to this part and the effects thereof on the amount of time and resources required which otherwise would be available for these standards;
- (2) Modify any policies and practices which interfere with or compromise a school's capability to achieve and maintain these standards;
- (3) Invite non-Federal agencies to evaluate the effects current policies and procedures have had on complying with the requirements of this part; and
- (4) Submit annually to the Director a copy of the summative evaluation.

- Requirement Met
 Non-Compliance
 Not Applicable

Finding:

The regulation is rated as non-compliant because the Associate Deputy Director - Office of Indian Services and the Education Resource Center have not conducted a summative evaluation to determine how BIE’s educational policies and administrative procedures assist or hinder compliance with the requirements of Part 36. This finding encompasses all sections of the requirement (1-4).

Actions Taken	BIE is currently collaborating with West Ed to examine monitoring processes, which involves documenting and adjusting processes as needed. However, the monitoring efforts being assessed do not specifically focus on the regulations in 25 CFR Part 36 and do not constitute an annual summative evaluation.
Challenges Faced	<p>Lack of Focus on Part 36 Compliance: Current monitoring processes may not adequately address the specific needs and requirements of 25 CFR Part 36, leading to gaps in compliance assessment.</p> <p>Insufficient Annual Evaluation Practices: There is currently no structured practice in place for conducting the required annual summative evaluations.</p>
Recommendations	<ol style="list-style-type: none"> 1) Systematically evaluate current Bureau educational policies and practices to identify those that negatively impact compliance with Part 36. Analyze how these policies affect the allocation of time and resources needed for achieving compliance. 2) Based on evaluation findings, develop strategies to modify or eliminate any policies and practices that hinder schools' capabilities to meet the standards outlined in Part 36. 3) Actively invite non-Federal agencies to participate in the evaluation process. Their insights can provide an external perspective on the effectiveness of current policies and procedures in relation to compliance. 4) Ensure that an annual copy of the summative evaluation, including the findings and any required actions to correct deficiencies, is submitted to the Director in a timely manner as stipulated in the regulation.

Summary of HES Annual Report

Summary of HES Annual Report

Following is a summary of the results of the Havasupai Elementary School 2025 Annual Compliance Assessment Report. The subsequent work plans will focus on the areas of non-compliance identified in this report. The full Annual report can be found at [HES Annual Assessment Report](#).

25 CFR § 36.11, Standard II for Administrative Requirements falls under Subpart B – Educational Management.			
	Requirement Met	Non-Compliance	Not Applicable
§36.11(a)(1) – Student to Staffing Ratio in Self-Contained Classrooms			X
§36.11(a)(2) – Student to Staffing Ratio in Multi-Grade Classrooms	X		
§36.11(a)(3) – Daily Teaching Load in Departmentalized Classrooms			X
§36.11(a)(4) – Waiver for Exceeding the Student to Staff Ratio			X
§36.11(a)(5) – Substitute Teacher or Non-Certified Teacher Requirements		X	
§36.11(b) – School Enrollment and Attendance Policy	X		
§36.11(c) – Immunization		X	

25 CFR § 36.20, Standard V for Minimum Academic Programs/ School Calendar falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Non-Compliance	Not Applicable
§36.20(a) – Early Dismissal Procedures for Counting School Day	X		
§36.20(b) – Multi-culture and multi-ethnic dimensions within the educational program		X	
§36.20(b)(1) – Assessment of the English & Native Language ability of students		X	
§36.20(b)(2) – Native culture in all curriculum areas		X	
§36.20(b)(3) – Assessment of student learning styles to inform instruction		X	
§36.20(b)(4) – Minimum field trip per child per year	X		
§36.20(c) – Intraschool programs from beginning to end of School Year		X	

25 CFR § 36.21, Standard VI - Kindergarten Instructional Program falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Non-Compliance	Not Applicable
§36.21(a) – Kindergarten Curriculum emphasize language development, native language, and requirements of Paragraph b & assisting children in developing positive feelings		X	

§36.21(b)(1) – Kindergarten Instructional Program includes: Language (observing, listening, speaking).		X	
§36.21(b)(2) - Kindergarten Instructional Program includes: (2) Exploration of the environment (number, space and time relationships, natural science).		X	
§36.21(b)(3) - Kindergarten Instructional Program includes: (3) Psychomotor and socialization development.		X	
§36.21(b)(4) – Kindergarten Instruction Program includes: (4) Development of imaginative and creative tendencies.		X	
§36.21(b)(5) - – Kindergarten Instruction Program includes: (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69		X	

25 CFR § 36.22, Standard VII – Elementary Instructional Program falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Non-Compliance	Not Applicable
§36.22(a)(1) – Elementary Instruction Program shall include: (1) Language arts.		X	
36.22(a)(2) – Elementary Instruction Program shall include: (2) Mathematics.		X	
§36.22(a)(3) – Elementary Instruction Program shall include: (3) Social Studies.		X	
§36.22(a)(4) – Elementary Instruction Program shall include: (4) Sciences.		X	
§36.22(a)(5) – Elementary Instruction Program shall include: (5) Fine Arts		X	
§36.22(a)(6) – Elementary Instruction Program shall include: (6) Physical Education.		X	
§36.22(b)(1) – School shall integrate content area into curriculum: (1) Career.		X	
§36.22(b)(2) – School shall integrate content area into curriculum: (2) Environmental and Safety Education.		X	
§36.22(b)(3) – School shall integrate content area into curriculum: (3) Health Education.		X	
§36.22(b)(4) – School shall integrate content area into curriculum: (4) Metric Education.		X	
§36.22(b)(5) – School shall integrate content area into curriculum: (3) Computer Literacy.		X	

25 CFR § 36.23, Standard VIII – Junior High/Middle School Instructional Program falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Non-Compliance	Not Applicable
§36.23(a) – Instruction Program Philosophy and a progressive development from elementary program to the secondary program.		X	

§36.23(b)(1) – Curriculum shall include required instruction content: (1) Language Arts.		X	
§36.23(b)(2) – Curriculum shall include required instruction content: (2) Social Studies.		X	
§36.23(b)(3) – Curriculum shall include required instruction content: (3) Mathematics.		X	
§36.23(b)(4) – Curriculum shall include required instruction content: (4) Science.		X	
§36.23(b)(5) – Curriculum shall include required instruction content: (5) Fine Arts and Practical Arts.		X	
§36.23(b)(6) – Curriculum shall include required instruction content: (6) Computer Literacy.		X	
§36.23(b)(7) – Curriculum shall include required instruction content: (7) Physical Education.		X	
§36.23(c)(1) – Content area shall be integrated into curriculum: (1) Career Exploration and Orientation.		X	
§36.23(c)(2) – Content area shall be integrated into curriculum: (2) Environmental and Safety Education.		X	
§36.23(c)(3) – Content area shall be integrated into curriculum: (3) Metric Education.		X	
§36.23(c)(4) – Content area shall be integrated into curriculum: (4) Consumer Economics.		X	
§36.23(c)(5) – Content area shall be integrated into curriculum: (5) Health Education.		X	
§36.23(d) - Languages other than English are encouraged to be offered as a content area.	X		
§36.23(e) - Laboratory or vocational exploration class.			X

25 CFR § 36.30, Standard X – Grading Requirements falls under Subpart D – Student Instruction Evaluation.

	Requirement Met	Non-Compliance	Not Applicable
§36.30(a) – Uniform Grading System assesses student’s mastery of prescribed objectives.		X	
§36.30(b) – Information derived from student instructional evaluations shall be shared with the student and with the parents.		X	
§36.30(c) – Parent/Teacher conferences focused on student’s instructional progress shall be held.	X		
§36.30(d)(1-3) – Report card shall (1) Recommendations and probable promotion status; (2) Appropriate signatures and request for return of report cards; and (3) Student attendance record.		X	
§36.30(e) - A summary of each year's final card shall become part of the student's permanent school record.	X		

25 CFR § 36.31, Standard XI – Student Promotion Requirements falls under Subpart D – Student Instruction Evaluation.

	Requirement Met	Non-Compliance	Not Applicable
§36.31 – Establish and implement a Promotion Policy which shall be submitted to and approved by the local school board and Area Education Program Administrator.		X	
§36.31(a) – Each grade minimum criterion for student promotion based primarily on measurable mastery of the instructional objectives.		X	
§36.31(b) - Criterion-referenced tests that evaluate student skills shall be utilized for measuring the mastery of instructional objectives.		X	
§36.31(c) A student who has not participated, either directly or through approved alternative instructional methods or programs, in a minimum of 160 instructional <u>days</u> per academic term or 80 instructional <u>days</u> per semester without a written excused absence shall not be promoted.		X	

25 CFR § 36.40, Standard XIII – Library/media program falls under Subpart E – Instructional Support.

	Requirement Met	Non-Compliance	Not Applicable
§36.40(a)(1) – Shall provide a library/media program that meets the applicable state and/or regional standards: Written set of instructional and service objectives shall be established with the librarian/media specialist with students and staff.		X	
§36.40(a)(2) - A written policy for the selection of materials and equipment shall be developed by a library committee and approved by the school board.		X	
§36.40(a)(2)(i)(A-C) - A collection of books suitable for the range of student abilities and interests being served meet ADM ratios.		X	
§36.40(a)(2)(ii) - Eight (8) to 12 percent of the basic collection must be composed of reference books, currently relevant and in a state of good physical condition, for practical use.		X	
§36.40(a)(2)(iii) - A periodical collection, suitable for the range of student abilities and interests being served, consisting of one (1) periodical for every ten (10) students, shall be maintained.		X	
§36.40(a)(2)(iv) - A professional collection for the school staff shall be developed and maintained by the librarian in cooperation with a faculty committee.		X	
§36.40(a)(2)(v) - A variety of audio-visual materials, suitable for the range of instruction being provided, of at least 750 items or five (5) items for each student, whichever is larger, and inclusive of materials located in the classrooms shall be maintained.		X	
§36.40(a)(3) - There shall be a library media center serviced by a librarian.		X	
§36.40(a)(4) - All libraries must conduct an annual inventory of available books, materials, and equipment in accordance with the acquisitions and selection policies.		X	

25 CFR § 36.41, Standard XIV – Textbooks falls under Subpart E – Instructional Support.			
	Requirement Met	Non-Compliance	Not Applicable
§36.41(a) Each school shall establish a textbook review committee composed of teachers, parents, and students, and school board members.		X	
§36.41(b)(1-3) The textbook review committee shall establish a procedure and criteria for the annual review of textbooks and other materials used to complement instruction.		X	
§36.41(c) Each school shall equitably distribute instructional materials to all classrooms.	X		

25 CFR § 36.42, Standard XV – Counseling Services falls under Subpart E – Instructional Support.			
	Requirement Met	Non-Compliance	Not Applicable
§36.42 - Each school shall offer student counseling services concerned with physical, social, emotional, intellectual, and vocational growth for each individual. Counseling services shall be included in a school-wide assessment program.		X	
§36.42(a)(1) - Each Agency and Area, as appropriate, shall institute and supervise an assessment program for its schools in order to provide for the objective assessment of student academic performance: Each Spring, schools shall conduct testing for grades 4, 8, and 12 using a current version of a standardized academic achievement test based upon the national assessment standards designed to assess higher order thinking skills.	X		
§36.42(a)(2) - Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.	X		
§36.42(a)(3) - Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.	X		
§36.42(a)(4) - Parents/guardians shall be informed of their children's assessment results and provided with an explanation and interpretation to ensure adequate understanding of the results.	X		
§36.42(a)(5) - Each school's instructional program shall establish an ongoing student academic assessment program to ensure that defined assessment procedures are in place.	X		
§36.42(a)(6) - Each Agency and Area, as appropriate, shall report the results of each school's formal Spring tests to the Office of Indian Education Programs by August 1 of each year.	X		
§36.42(b)(1) - The counseling program shall provide the following: Each school having a minimum school ADM of 200 students shall make provisions for the full-time professional services of a counselor, and each school enrolling fewer than 200 students shall make provisions for a part-time professional counselor.		X	

§36.42(b)(2) - The counseling program shall provide the following: The counselors shall be familiar with the unique tribal, social, and economic characteristics of students.		X	
§36.42(b)(3)(i) - The counseling program shall contain the following: A written referral process	X		
§36.42(b)(3)(ii) - The counseling program shall contain the following: Counseling techniques and documentation procedures to provide for the career, academic, social, and personal needs of the students which are based on the cultural beliefs and values of the students being served.		X	
§36.42(b)(3)(iii) - The counseling program shall contain the following: Preventative and crisis counseling on both individual and group bases		X	
§36.42(b)(3)(iv) - The counseling program shall contain the following: Confidentiality and security of counseling records for each student; and		X	
§36.42(b)(3)(v) - The counseling program shall contain the following: Design and implementation of orientation programs to facilitate the pupil's transition from elementary to junior high/middle school and from junior high/middle school to high school.		X	
§36.42(b)(3)(vi) - The counseling program shall contain the following: Each junior or middle school and high school student shall receive academic counseling a minimum of twice yearly during which time the counselor shall assist the student in developing a written academic and career plan based on ability, aptitude, and interests.		X	
§36.42(b)(3)(vii) - The counseling program shall contain the following: Each high school counseling program shall be required to have on file for each student a planned academic program of studies which is available from the regular course offerings of the school to meet the student's career objectives and which will show that the student has received counseling.			X

25 CFR § 36.43, Standard XVI – Student Activities falls under Subpart E – Instructional Support.

	Requirement Met	Non-Compliance	Not Applicable
§36.43 - All schools shall provide and maintain a well-balanced student activities program based on assessment of both student and program needs.		X	
§36.43(a) - All student activities shall be required to have qualified sponsors and be approved by the school supervisor, and the school board shall approve the overall activity plan.		X	
§36.43(b) - A plan of student activity operations shall be submitted, by each activity at the beginning of each school year, to the school supervisor.		X	
§36.43(c) - School may participate in interscholastic sports and activities on an informal or formal basis.			X

§36.43(d) - Until comparable competitive opportunities are provided to all students, regardless of sex, no student shall be barred from participation in interscholastic competition in noncontact sports except on the basis of individual merit.			X
§36.43(e) - Residential schools shall plan and provide an intramural program for all students. The program shall include a variety of scholastic and sport activities.			X
§36.43(f) - Students shall be involved only in activities which are sanctioned by the school.	X		
§36.43(g) - All student activities involved only in fundraising are required to establish a school/student activity bank account following school/student banking procedures outlined under 25 CFR 31.7.			X
§36.43(h) - The school shall provide for the safety and welfare of students participating in school-sponsored activities.		X	
§36.43(i) - Each sponsor of a student activity will be given orientation and training covering the responsibilities of a sponsor by the school supervisor.		X	

25 CFR § 36.50, Standard XVII – School Program evaluation and needs assessment falls under Subpart F – Evaluation of Educational Standards.

	Requirement Met	Non-Compliance	Not Applicable
§ 36.50- Each school shall complete a formal, formative evaluation at least once every seven (7) years beginning no later than the second complete school year following the effective dates of this part.	X		
§ 36.50(a)- Each <u>school</u> 's evaluation design or model will provide objective and quantitative analysis of each area to be evaluated.	X		
§ 36.50(b)- The Director, within six (6) months from the effective date of this part, shall distribute to each school, Agency, or Areas appropriate, a standardized needs assessment and evaluation instrument with guidelines for developing and applying a locally appropriate evaluation model for carrying out the requirements of this standard.	X		

25 CFR § 36.51, Standard XVIII – Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities falls under Subpart F - Evaluation of Educational Standards.

	Requirement Met	Non-Compliance	Not Applicable
§36.51(a)- The Office of Indian Education Programs shall monitor and evaluate the conformance of each <u>Agency</u> or Area, as appropriate, and its <u>schools</u> with the requirements of this part.		X	
§36.51(b)- Each <u>Agency</u> or Area, as appropriate, in conjunction with its <u>school board</u> shall monitor and evaluate the conformance of its <u>school</u> with the requirements of this part through an annual onsite evaluation involving one-third of the <u>schools</u> annually, thereby monitoring onsite each <u>school</u> at least once every three (3) years.		X	

<p>§36.51(c)- Schools, Agencies, and Areas shall keep such records and submit to the responsible official or designee accurate reports at such times, in such form, and containing such information as determined by that official to be necessary to ascertain conformance with the requirements of this part.</p>			X
<p>§36.51(d)- <u>Schools</u>, Agencies, and Areas shall permit access for examination purposes by the responsible official, or any duly authorized designee, to any <u>school</u> records and other sources of information which are related or pertinent to the requirements of this part.</p>	X		
<p>§36.51(e)- The Office of Indian Education Programs, Agency Superintendent for Education, or Area Education Programs Administrator, as appropriate, shall annually conduct a summative evaluation to assess the degree to which each Bureau educational policy and administrative procedure assists or hinders schools in complying with the requirements of this part.</p>		X	