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Havasupai Elementary School Annual Report

JUNE 2026

Background and Overview

In 2023, the Bureau of Indian Education (BIE) 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). The 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. Work plans continued to be updated throughout 2025-2026.

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 first annual report was issued on February 12, 2025, and posted online March 13, 2025. The annual report dates have been modified to assess a full school year of work towards compliance. This report is due June 4, 2026, and will be posted online by July 6, 2026.

To ensure that each Annual Report reflects a full school year of work toward compliance, BIE proposed shifting the reporting timeline from February to June. Plaintiffs' Counsel agreed to this adjustment with two conditions: (1) that four Annual Reports are still produced under the terms of the Settlement Agreement, and (2) that the Compliance Specialist position is extended through June 2028. Under this revised timeline, the final Annual Report will assess progress made during the 2027–2028 school year. The current report is therefore due June 4, 2026, and will be posted online by July 6, 2026.

Havasupai Elementary School Annual Report

Since February 2025, HES has demonstrated significant progress toward meeting the requirements of the 13 regulations. HES strengthening the systems needed to sustain compliance. The June 2026 compliance review shows considerable growth across nearly all regulatory areas, reflecting the school's ongoing commitment to improving educational quality, strengthening documentation systems, and aligning daily practice with federal regulations.

Summary of Results

For this report, the 13 regulations were reorganized into 51 sub regulations to allow for a more precise and meaningful assessment of compliance. Of these 51 sub regulations, 40 were assessed as Requirement Met, 6 were assessed as Partially Met, and 5 were Not Applicable. When viewed as the full regulation, 9 of the 13 regulations (36.11, 36.21, 36.22, 36.30, 36.31, 36.41, 36.43, 36.50, and 36.51) achieved 100% compliance. Overall, the school's compliance rate has grown dramatically from 22% in February 2025 to 87% in June 2026, representing the most substantial year over year shifts since the Settlement Agreement was initiated.

Table 1: Regulation Summary of Results

Regulation Reviewed	Total Sub Regulations	Regulations Not Applicable	Regulation Met	*Total Non-compliance and Partially Meets
25 C.F.R.§36.11	3	0	3	0
25 C.F.R.§36.20	3	0	2	1
25 C.F.R.§36.21	2	0	2	0
25 C.F.R.§36.22	2	0	2	0
25 C.F.R.§36.23	5	1	3	1
25 C.F.R.§36.30	5	0	5	0
25 C.F.R.§36.31	1	0	1	0
25 C.F.R.§36.40	4	0	2	2
25 C.F.R.§36.41	3	0	3	0
25 C.F.R.§36.42	5	0	3	2
25 C.F.R.§36.43	10	4	6	0
25 C.F.R.§36.50	3	0	3	0
25 C.F.R.§36.51	5	0	5	0
Totals	51	5	40	6

*Each regulation may have more than one non-compliance or partially meets.

This progress was supported by a more deliberate and collaborative approach to monitoring and technical assistance. Since the February 2025 Annual Report, the Compliance Specialist completed seven onsite visits to HES, working alongside school leadership, teachers, and support staff to communicate expectations, gather evidence, and build capacity. In partnership with Associate Deputy Director-Bureau Operated Schools (ADD BOS) office and the Albuquerque Education Resource Center (ERC), each of the 13 regulations now has an assigned Education Specialist point of contact. The Compliance Specialist meets weekly with specialists to review evidence, problem solve, and create targeted tasks based on areas of need. Monthly compliance updates to the School Board have also strengthened oversight and transparency, ensuring board members remain informed and can support the school in its continued improvement.

Improvements in documentation systems also played a major role in this year’s growth. The school’s SharePoint site has been reorganized to store lesson plans, curriculum maps, schedules, handbooks, school policies, and compliance artifacts in a more accessible and structured way. These upgrades allow for more efficient evidence collection, clearer communication across school teams, and a more sustainable approach to maintaining compliance documentation over time.

Instructional leadership, provided by technical assistance from the ADD BOS ERC, emerged as one of the strongest drivers of improvement. Much of HES’s progress, particularly within instructional program standards stemmed from the expertise and support of the ADD -BOS Curriculum and Instruction Specialist, who consistently coached teachers on instructional expectations, supported curriculum implementation, modeled effective planning structures, calibrated walkthrough observations with the principal, and monitored the consistent use of the lesson plan template Their support contributed directly to marked improvements in curriculum fidelity, instructional alignment, and clarity of expectations across grade levels. These gains were further strengthened by the principal’s increased use of walkthroughs utilizing components of Cognia’s ELEOT tool and checking for lesson plan fidelity.

As HES looks ahead, the retirement of the ADD BOS Curriculum and Instruction Specialist creates a potential gap in the type of instructional support that contributed significantly to this year’s progress. Much of the improvement in curriculum fidelity,

lesson planning, and instructional alignment occurred while this support was consistently available. Without a comparable source of guidance or coordination, there is a risk that some of these gains may be difficult to sustain over time. Identifying a way to maintain ongoing support in areas such as lesson plan monitoring, curriculum implementation, and the use of instructional data, whether through existing staff capacity, ERC support, or partnerships, could help preserve the progress achieved this year and strengthen long-term instructional stability.

While the school has demonstrated strong improvement overall, the area that emerged as the major improvement priority for the upcoming year is Culture and Language. Cultural integration efforts continue to rely heavily on individual teacher initiative rather than a schoolwide framework. The school needs the following to meet compliance:

- a unified documented plan for integrating Havasupai culture and language into all content areas;
- a formal Havasupai language assessment to track student progress;
- and more tribally relevant instructional materials across subjects such as the library/media center, counseling programs, and student activities;
- a culturally informed system to ensure counselors understand the unique tribal, social, economic, and cultural context of the Havasupai people.

Strengthening cultural programming and expanding partnerships with Havasupai cultural knowledge holders will be essential in meeting with the intent of 25 CFR Part 36.

As HES moves into School Year 2026–2027, BIE recommends HES to consider building systems of sustainability across all regulatory areas. The school has shown that it can make significant progress with consistent coaching, targeted support, and strong partnerships. The opportunity for HES is to ensure these improvements remain considering unexpected events such as staff turnover, or changes in technical assistance and support structures. Strengthening HES instructional leadership roles, solidifying documentation systems, developing clear cultural and instructional frameworks, and embedding repeatable processes will be key to maintaining compliance long-term.

Overall, the progress reflected in this year's 87% compliance rate is substantial and reflects the dedication of HES staff, leadership, community partners, and support teams across BIE. With continued focus on Culture and Language, strengthened instructional leadership capacity, and deeper development of sustainable systems, Havasupai Elementary School is well positioned to build on this year's gains and continue moving toward full compliance.

Submitted by:

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June 4, 2026

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25 CFR §36.11 Standard II - Administrative Requirements

25 CFR §36.11, Standard II – Administrative Requirements, falls under Subpart B: Educational Management. This standard includes **three subsections**. Based on the findings of this assessment, HES is **compliant with all 3 of the 3 subsections**, with no partially met, noncompliant, or not applicable determinations. This results in a **100% compliance rate** for §36.11. This represents a **significant improvement** from the February 2025 Annual Report, which reported a **50% compliance rate** for this regulation.

Legal Citation: 25 CFR §36.11

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

- (1) 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

- (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.
- (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.
- (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.
- (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
 Partially Met
 Non-Compliance
 Not Applicable

Regulation Status Summary

HES consistently maintained staffing ratios below the maximum requirements outlined in 25 CFR §36.11(a) throughout the 2025-2026 school year. Site visit observations and NASIS registrar reports confirm that all self-contained multi-grade classrooms operated within the allowable student-to-teacher ratios.

The school operated one departmentalized PE class; however, the total student instructional load remained well under the 150-student maximum. HES does not enroll 150 students overall, further ensuring compliance. In accordance with §36.11(a)(5), no class was without a certified teacher for more than 20 days. During teacher absences, the principal prioritized assigning certified personnel for coverage, ensuring instructional continuity and maintaining compliance with substitute teacher requirements.

HES fully meets the staffing requirements of 25 CFR §36.11(a). The school maintains appropriate class sizes, uses certified instructional staff for class coverage, follows departmentalized load limits, and ensures that uncertified staff do not exceed 20 days of instructional responsibility. Documentation and observations consistently support full compliance.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The school has written enrollment and attendance policies documented in the School Policies and Procedures Handbook on pages 16–21. These policies align with 25 CFR §36.11(b) and are consistent with applicable federal, state, and tribal requirements.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES collects, uploads, and reviews student immunization records in accordance with state requirements and Indian Health Service (IHS) standards. Immunization reviews are conducted in collaboration with the IHS Public Health Nurse, and complete immunization records are on file for all enrolled students. During the 2025–2026 school year, the school and Public Health Nurse completed two full immunization reviews, ensuring ongoing compliance with 25 CFR §36.11(c).

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

25 CFR §36.20, Standard V – Minimum Academic Programs/School Calendar, falls under Subpart C: Minimum Program of Instruction. This standard includes **three subsections**. Based on this year’s assessment, HES is **compliant with 2 of the 3 subsections, partially met with 1**, and has no noncompliant or not applicable determinations. This results in a **67% compliance rate** for §36.20, a substantial improvement from the **28.57% compliance rate** reported in February 2025.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The school did not experience any emergencies resulting in early dismissal during the 2025–2026 school year. In the event such an incident were to occur, the school has established emergency incident report procedures, and any shortened instructional day would be documented in NASIS to verify that required instructional hours were met. These existing procedures ensure compliance with 25 CFR §36.20(a).

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.

- (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.
- (2) The school program shall include aspects of the native culture in *all* curriculum areas. Content shall meet local tribal approval.
- (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.
- (4) The school program shall provide for at least one field trip per child per year to broaden social and academic experiences.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES implements several components of the multi-culture and multi-ethnic requirements under 25 CFR §36.20(b). The school assesses students' English proficiency through multiple formative and summative measures, including classroom assessments, BIE assessments, and i-Ready. Although the Havasupai Language and Culture curriculum includes optional formative checks, the school does not have a structured language-tracking system or a formal assessment tool to monitor student progress in Havasupai language acquisition.

Students receive Havasupai Language and Culture instruction on a four-day rotation using curriculum materials approved by the Tribe. Classroom observations and student work samples demonstrate meaningful efforts by teachers to incorporate Native and local cultural content across curriculum areas. Examples include using culturally relevant art prompts; integrating cottonwood tree traditional knowledge into science lessons on plant life cycles; embedding Havasupai language vocabulary in ELA and science; assigning math problems connected to beading and canyon hiking; and using Native-authored texts in ELA and social studies. Classrooms also display Havasupai language posters and visual supports.

However, these practices are largely teacher-initiated rather than part of a unified, schoolwide cultural integration plan. The school does not yet have a documented framework outlining expectations, resources, or approved content for integrating culture into each subject area, nor a process for presenting such a framework for tribal approval as required.

The school administered learning-style assessments for all students at the beginning of the year, and the school's lesson plan template includes a section for documenting learning-style considerations. During observations, multiple modalities were evident in instruction, though implementation was inconsistent across classrooms.

Students participated in at least one field trip during the school year, including a culture-based trip to the creek to study the role of water in Havasupai culture and a kindergarten trip to distribute hot cocoa to community locations in the village. These experiences meet the requirements of §36.20(b)(4).

Because several elements of the regulation are implemented, but the school lacks a formalized system for consistent cultural integration and assessment, the requirement is rated **Partially Met**.

Recommendations

Develop a Schoolwide Cultural and Language Integration Framework

Create a clear, schoolwide plan outlining how Native American/Havasupai culture, language, and community knowledge will be intentionally incorporated into all curriculum areas. This framework should:

- Identify expectations for integration by subject and grade level
- Provide vetted resources, sample lessons, and approved cultural content
- Include guidance for lesson alignment with tribal values and cultural protocols
- Be developed collaboratively with the Culture & Language teacher and selected community support persons
- Be submitted for School Board feedback and then presented to Tribal Council for approval

Strengthen Havasupai Language Lesson Planning and Assessment Documentation

Develop a simple lesson-and-assessment documentation form for the Culture & Language teacher to record:

- Lessons taught (with dates)

- Curriculum units used
- Formative assessment methods and student progress indicators

Compile and Use Learning-Style Data More Systematically

Create a simple chart or digital dashboard summarizing schoolwide learning-style results. Encourage teachers to reference this data when planning lessons and documenting differentiated modalities directly in lesson plans.

Strengthen Field Trip Documentation and Explore Virtual Field Experiences

Continue ensuring all off-campus trips have documented permission slips and clear educational objectives. Because access beyond the canyon is limited, identify reputable virtual field trip platforms to broaden students' academic and cultural experiences.

Engage Community Support Persons in Cultural Integration

Work with the Facilitator to identify community members who can serve as community support persons to share cultural knowledge, stories, or skills. Because the federal background-check process can be a barrier:

- Explore a rotation system in which community support persons participate up to twice per year before a formal BIE background check is required

Use general safety screenings and supervised participation for individuals who have not yet completed the full check

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirements of 25 CFR §36.20(c) through the implementation of **Genius Time**, which has been offered consistently from the first day of school and will continue through the final instructional day of the year. Students rotate daily through a range of instructional and enrichment offerings including Library, Leadership, STEAM, Art, Computers, Nutrition, Mindfulness, and Kindness. These intraschool programs provide inquiry-based, student-directed learning that enhances academic engagement, skill development, and overall well-being. All offerings are provided throughout the full school term, ensuring compliance with the regulation.

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. This standard includes **two core subsections**. Based on this assessment, HES is **compliant with both requirements**, with no partially met, noncompliant, or not applicable determinations. This results in a **100% compliance rate** for §36.21, representing a major improvement from the **0% compliance rate** reported in February 2025.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The kindergarten instructional program at Havasupai Elementary School meets the requirements of 25 CFR §36.21(a). The school utilizes the Savvas curriculum, a vetted program that aligns with kindergarten grade-level standards and supports foundational language development. Kindergarten students also attend Havasupai Language and Culture class, taught using a curriculum approved by the Tribe, providing exposure to and maintenance of the native language as appropriate under 25 CFR 39.11(g).

In addition to academic language development, the school implements the Character Strong curriculum to support social-emotional learning. Students further develop positive interpersonal skills, kindness, and self-regulation through Mindfulness and Kindness rotations during Genius Time. These combined instructional experiences contribute to students' ability to develop positive feelings about themselves and others, as required by this regulation.

Legal Citation: 25 CFR §36.21

(b) 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) (5) Health education inclusive of the requirements contained in the Act of May 20, 1886, 24 Stat. 69.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirements outlined in 25 CFR §36.21(b) (1–5) through a comprehensive and well-rounded kindergarten instructional program. The Savvas curriculum provides structured instruction in language development; exploration of the environment through early numeracy, spatial reasoning, and scientific observation; psychomotor growth; and creative development. Lesson plans document daily instruction and demonstrate alignment with all required content areas. Walkthroughs by the principal and Compliance specialist also verify utilization of the curriculum.

Kindergarten students participate in Physical Education throughout the school year and receive health education through Nutrition, Kindness, and Mindfulness rotations offered during Genius Time. In addition, Genius Time includes Art and STEAM, which further support creativity, imaginative play, hands-on exploration, and fine-motor skill development — all core components of §36.21(b).

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 and includes **two core subsections**. Based on this year’s assessment, HES is **compliant with 2 of the 2 requirements**, with no partially-met, noncompliant, or not applicable determinations. This results in a **100% compliance rate** for §36.22, a significant improvement from the **0% compliance rate** reported in February 2025.

Legal Citation: §36.22

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

- (1) Language arts.
- (2) Mathematics.
- (3) Social studies.
- (4) Sciences.
- (5) Fine arts.
- (6) Physical education.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirements of 25 CFR §36.22(a)(1–6). The school implements the Savvas curriculum to provide structured, standards-aligned instruction in language arts, mathematics, social studies, and science across grades 1–6. Daily instruction is documented through lesson plans, and walkthroughs conducted by the principal and compliance specialist verify that teachers are implementing the curriculum as intended.

Fine arts instruction is provided through Genius Time, where students participate in Art and STEAM rotations that support creative expression and hands-on exploration. Physical education was provided through Genius Time at the beginning of the school year; once additional staff were hired, a dedicated PE teacher taught PE four days per week. At the time of this report, PE is being delivered by general education teachers during scheduled PE periods following the departure of the PE teacher, ensuring continuity of instruction through the end of the school year.

Overall, HES demonstrates full implementation across all required elementary instructional content areas.

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,
- (3) Health education (includes requirements contained in 24 Stat. 69),
- (4) Metric education, and
- (5) Computer literacy.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirements of 25 CFR §36.22(b) through a combination of the Savvas curriculum and enrichment offerings provided during Genius Time. The Savvas curriculum incorporates instruction in career awareness, environmental and safety education, metric education, and computer literacy within its reading, science, and math units. This ensures that required integrated content areas are embedded within core instruction.

Genius Time further strengthens these areas through rotations such as Library, Career Awareness, STEAM, Art, Computers, Health, Nutrition, Mindfulness, and Kindness. These hands-on experiences reinforce environmental understanding, foundational computer literacy, career exploration, and health-related skills, including requirements outlined in 24 Stat. 69.

Additionally, the school's lesson plan template includes a designated section for teachers to document when integrated content areas are incorporated, providing clear and consistent evidence that Savvas and Genius Time components meet §36.22(b) expectations. Walkthroughs and lesson plan reviews conducted by leadership confirm that integrated content is being addressed throughout the school year.

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

25 CFR §36.23, Standard VIII – Junior High/Middle School Instructional Program, falls under Subpart C: Minimum Program of Instruction and includes **five core subsections**. Based on this assessment, HES is **compliant with 3 of the 5 requirements, partially compliant with 1, and 1 requirement was not applicable**, with no findings of noncompliance. This results in a **60% compliance rate** for §36.23, marking considerable improvement from the **7% compliance rate** reported in February 2025.

Legal Citation: §36.23(a):

(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.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES developed and adopted a school philosophy on March 4, 2026, with input gathered from students, staff, Tribal Council, School Board members, and community stakeholders. Documentation of this process, including stakeholder feedback forms and iterative drafts, demonstrates appropriate community involvement in the development of the philosophy.

Instructional practices at HES reflect key elements of the adopted philosophy. Teachers implement standards-aligned Savvas curriculum; students participate in Havasupai Language & Culture classes; and whole-child instructional priorities are supported through SEL instruction (Character Strong) and Genius Time rotations, including STEAM, Art, Computers, Nutrition, Mindfulness, and Kindness. These learning experiences emphasize cultural relevance, academic preparedness, and environmental awareness, consistent with the philosophical focus areas. Walkthroughs and lesson plans further confirm that instruction is student-centered and aligned with the school's academic goals.

Progression across grade levels is supported by the Savvas scope and sequence and the BIE College & Career Standards, which together provide a coherent developmental pathway from elementary through middle school. However, while instructional practices generally align with the philosophy, HES does not yet have a **formalized system** that *explicitly documents and monitors* how the philosophy guides instruction across grade levels, nor does it have a process for demonstrating how emerging student and community needs are used to adjust program design.

Because several elements of the regulation are implemented, but the school does not yet have a documented and systematic process to show how the philosophy drives instructional decisions and program adjustments across grade levels, the requirement is rated **Partially Met**.

Recommendations

Philosophy ↔ Instruction Alignment Crosswalk

Create a concise matrix mapping each philosophy principle (e.g., academic excellence, cultural relevance, PBIS/positive behavior, community partnership, continuous improvement) to specific instructional practices and artifacts (Savvas units, Culture & Language lessons, Genius Time rotations, SEL activities, field experiences).

Rationale: Makes alignment explicit, portable, and reviewable across staffing changes.

Annual Culture/Climate (Students, Families, Community)

Use brief culture & climate surveys, 2–3 focus groups (e.g., School Board, parent committee, culture elders), and a simple feedback form to monitor whether the school is meeting the needs of *Rationale:* Demonstrates that programming reflects needs of students and the students and community

Embed the Work in the BIE One Plan for System Sustainability

Use the comprehensive needs assessment to evaluate the school program alignment with the philosophy and the needs of the students and community.

Explicit Documentation of Alignment

- Finish the crosswalk;
- Maintain a shared evidence folder each quarter (plans, observation notes, student work).

Demonstrating Responsiveness to Student & Community Needs

Administer brief culture/climate surveys; summarize how findings shaped instruction and school practices (e.g., adding units, adapting Genius Time rotations).

Legal Citation: §36.23

(b) 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.
- (5) Fine arts and practical arts. One unit each shall be required of each student in the junior high/middle school instructional program.
- (6) Computer literacy. One unit shall be required of each student in the junior high/middle school instructional program.
- (7) Physical education. One unit shall be required of each student in the junior high/middle school instructional program.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets all requirements outlined in 25 CFR §36.23(b) for junior high/middle school instructional content. The school uses the Savvas curriculum, which provides comprehensive, standards-aligned instruction in language arts, mathematics, social studies, and science, ensuring that each student receives the required units annually. Fine arts and practical arts are delivered through Genius Time rotations, including Art and STEAM, which offer structured opportunities for creative expression, applied problem-solving, and hands-on learning. Computer literacy is also provided during Genius Time through dedicated Computer rotations that support digital skills, research abilities, and foundational technology competencies.

Physical education has been consistently implemented. PE instruction was initially provided through Genius Time, then by a dedicated PE teacher for four days per week once staffing stabilized. After the departure of the PE teacher, PE continues to be provided by general education teachers during scheduled PE periods, ensuring instructional continuity through the end of the school year.

Walkthroughs conducted by the principal and compliance specialist confirm that teachers are implementing the Savvas curriculum and that required instructional content is delivered consistently across grade levels. Based on this evidence, HES meets all required content-area expectations under §36.23(b).

Legal Citation: §36.23(c):

(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).
- (5) Health education (includes meeting the requirements contained in 24 Stat. 69).

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirements of 25 CFR §36.23(c) by integrating all required content areas—career exploration, environmental and safety education, metric education, consumer economics, and health education—into its middle school curriculum.

The **Savvas** curriculum incorporates metric instruction, environmental and safety education, consumer economics concepts, and career-related themes across ELA, mathematics, science, and social studies units. This integration aligns with prior instructional-support work documented as part of the compliance planning for 25 CFR §36.23.

Additionally, **Genius Time rotations** reinforce required content areas. Career exploration and orientation are addressed in *Career Awareness* rotations, while *STEAM*, *Computers*, and *Library* rotations support technology literacy, problem-solving, and applied metric learning. Health education—meeting the requirements of 24 Stat. 69—is provided through *Health*, *Nutrition*, *Mindfulness*, and *Kindness* rotations. Walkthroughs conducted by school leadership confirm that these integrated components are being implemented consistently.

Collectively, the curriculum and Genius Time offerings ensure that all required content areas are addressed throughout the school year, resulting in full compliance with §36.23(c).

Legal Citation: 36.23(d)

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School meets the requirement outlined in 25 CFR §36.23(d). Beginning in junior high/middle school, students receive instruction in a language other than English through the **Havasupai Language and Culture** class. This course is taught on a rotational schedule and uses Tribal-approved curriculum materials that introduce vocabulary, cultural concepts, and conversational elements of the Havasupai language. Instruction is delivered consistently throughout the school year and is supported by culturally relevant activities and visual language resources in classrooms. These practices demonstrate that the school offers and encourages the study of a language other than English at the middle school level, as required.

Legal Citation: §36.23(e)

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES does not offer 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. This standard includes **five core subsections**. Based on this assessment, HES is **compliant with all 5 of the 5 requirements**, with no partially-met, non-compliant, or not-applicable determinations. This results in a **100% compliance rate**, a major increase from the **40% compliance rate** reported in February 2025.

Legal Citation §36.30(a)

(a) 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.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES has adopted a uniform, school-wide grading policy has been formally adopted and incorporated into the student handbook. The grading policy clearly states that grades are based on the mastery of prescribed course objectives, aligning directly with the regulation's requirement.

Evidence shows the policy is implemented consistently and provides teachers with clear expectations for determining grades. The system ensures that academic attainment is measured accurately and reported in a manner that reflects students' progress toward mastering grade-level standards.

Because the school maintains a documented, uniform grading system aligned with mastery-based reporting, the requirement is met.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The school meets the requirements of §36.30(b). Information from instructional evaluations is shared with students and parents through the NASIS parent portal, which provides families with access to grades, attendance, and assessment data. Teachers maintain data files containing assessment results and student work samples, and they use this information to make instructional adjustments as documented in lesson plans.

Students receive feedback on their progress, and teachers use the evaluation data to plan subsequent learning activities, demonstrating alignment with the regulation's requirement to use instructional evaluation results to guide teaching and learning. Because the school has systems in place to share data with parents and students and uses that data for instructional decision-making, the requirement is met.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is compliant with this regulation because parent-teacher conferences were held during both reporting periods: Fall conferences were conducted on November 7, 2025, and Spring conferences were conducted on March 20, 2026. Teachers documented consistent and proactive outreach to families prior to each conference. Outreach methods included Facebook posts, the school newsletter, the school marquee, letters sent home, email communication, and text messaging. The school also utilizes the Remind App to streamline communication and ensure accessibility.

To increase participation, HES offered multiple formats for conferences, including virtual meeting options for families unable to attend in person. These efforts demonstrate that the school consistently provided feasible and practical opportunities for parent-teacher communication regarding student progress.

Legal Citation: §36.30(d)

(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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is compliant with this regulation. Report cards are issued four times per year and consistently include all required elements: probable promotion status, student attendance, and signature lines for both teachers and parents. When families do not attend conferences, report cards are sent home to ensure parents still receive timely academic information. The school also encourages the return of signed report cards by offering student incentives, supporting strong documentation for cumulative records.

Legal Citation: 36.30(e)

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School is compliant with this regulation. Students' permanent school records are maintained in NASIS, which securely stores report card data throughout the year. At the end of each school year, the final report card is filed in the student's cumulative record, ensuring it becomes a documented part of the permanent school record as required.

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 and includes **one core subsection**. Based on this assessment, HES is **compliant with 1 of 1 requirement**, with no partially-met, non-compliant, or not-applicable determinations. This results in a **100% compliance rate**, improving from the **0% compliance rate** noted in February 2025.

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. The requirements shall include, but not be limited to, the following:

- (a) Each grade level or equivalent shall have a minimum criteria for student promotion based primarily on measurable mastery of the instructional objectives.
- (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.
- (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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School is compliant with this regulation. The school's promotion policy has been formally approved by the Education Program Administrator (EPA) and has been added to the school handbook as an addendum. Teachers are consistently implementing criterion-referenced assessments embedded within the Savvas curriculum to measure mastery of grade-level standards and instructional objectives. These assessment practices are reviewed during compliance site visits to ensure fidelity of implementation.

The school has initiated structured outreach for students at risk of non-promotion due to attendance concerns. Meetings with families began in early spring, and individualized action plans are being collaboratively developed to support student success. In addition, the Student Success Team convened in May to begin reviewing promotion decisions for students who do not meet established criteria. The school has also created a standardized letter to document academic performance data, the justification for decisions, and the final determination for each case.

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

25 CFR §36.40, Standard XIII – Library/Media Program, falls under Subpart E: Instructional Support and includes **four core sub requirements**. Based on this assessment, HES is **compliant with 2 of the 4 requirements, partially compliant with 2**, and has **no non-compliant or not-applicable determinations**. This results in a **50% compliance rate** improving from the **0% compliance rate** noted in February 2025.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is compliant with this regulation. The school has a library/media handbook that includes a written set of instructional and service objectives aligned with the school's educational goals and philosophy. These objectives were developed using input gathered from staff, students, and community members through questionnaires, ensuring stakeholder involvement.

The objectives are also aligned with the BIE One Plan SMART goals, which are based on a comprehensive needs assessment. School leadership evaluated the library objectives in May 2026 to determine progress and the extent to which the objectives were met, satisfying the requirement for annual review.

Legal Citation: §36.40(a)(2)

(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:

(2) 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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is partially compliant with the requirements outlined in 25 CFR §36.40(a)(2). The school has an approved written policy for the selection of library materials and equipment, which was developed collaboratively and formally approved by the School Board on March 4, 2026. This satisfies the governance component of the regulation and demonstrates that appropriate procedures for materials selection are in place.

However, HES has not yet verified whether its current library/media collection meets the specific quantitative standards required under this subsection. At this time, the school cannot confirm compliance with the required ADM ratios for books, the 8–12% reference material threshold, the minimum number of periodicals, the professional collection requirements, or the 750-item (or 5-items-per-student) audiovisual materials threshold. The primary barrier to determining compliance is the absence of complete metadata for the existing collection, which prevents the school from generating accurate reports through its cataloging system.

To address this gap, ERC staff have begun gathering and entering metadata into a spreadsheet, which will later be uploaded into the Little Library system. This will allow HES to accurately assess its collection and identify needs for future purchasing. The school completed a full inventory in August 2025 and is currently working with ERC to establish a sustainable process for conducting annual inventories during the summer months. Once metadata entry and the updated inventory are complete, HES will be able to verify whether it meets each quantitative requirement and make targeted adjustments as needed.

Because the school has an approved selection policy but has not yet verified whether the library collection meets the required ratios, thresholds, and material counts due to incomplete metadata and inventory processes, the requirement is rated **Partially Met**.

Recommendations

Strengthen the Audiovisual Collection

- Expand the audiovisual collection by adding both physical materials and modern digital resources.
- Ensure the school meets the required minimum number of AV items by documenting both physical and digital materials in the library inventory system.

Build a Balanced Periodical Collection

- Maintain a periodical collection that includes a mix of print titles and digital subscriptions.
- Make periodicals easy for students and staff to access by listing them in a shared digital location.

Maintain a Comprehensive Professional Collection

- Provide staff with a professional collection that includes physical reference books and high-quality digital learning resources.
- Review and update the professional collection each year to ensure materials stay current.

Expand Tribal and Culturally Relevant Materials

- Add high-quality books, periodicals, and audiovisual resources that reflect Native American and Havasupai perspectives to meet the regulation's requirement for tribal materials.

Legal Citation: §36.40(a)(3)

(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:

(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
 Partially Met
 Non-Compliance
 Not Applicable

Regulation Status Summary

HES is compliant with this regulation. Although the designated staff member is not a certified librarian, she is a certified teacher who provides library/media services during daily Genius Time, which meets the CFR definition of a librarian. According to CFR 36.40, a "librarian" includes any certificated school employee whose primary responsibilities include selecting, preparing, cataloging, circulating materials, planning library use with staff and students, and instructing students in how to use library books and materials.

The Genius rotation schedule confirms that library instruction is provided across grade levels on a documented, consistent schedule. This certified teacher delivers library lessons, supports students in accessing materials, coordinates book circulation, and maintains library operations. These services fulfill the required 1/5-time librarian staffing expectation for a school with HES's enrollment.

The library media center is therefore adequately staffed and actively servicing all students through a predictable and structured schedule.

Legal Citation: §36.40(a)(4)

(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:

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is partially compliant with the requirement to conduct an annual library/media inventory in accordance with its acquisitions and selection policies. A BIE team conducted a comprehensive inventory in August 2025, which reestablished a functional baseline for the collection and allowed the library to operate more effectively during the 2025–2026 school year. This effort helped the school identify existing materials, remove unusable items, and begin organizing the collection for future reporting.

However, the 2025 inventory was not fully completed, and the school does not yet have a sustainable, school-led process to ensure that a complete and accurate inventory is conducted annually as required by the regulation. While a second BIE support visit is planned for summer 2026 to finish the remaining work, reliance on external teams is not a long-term solution. HES needs internal systems, trained staff, and established procedures to independently complete annual inventories, update metadata, and maintain accurate collection records from year to year.

Because the school has taken initial steps toward completing an inventory but does not yet have a fully completed collection record or a sustainable process to conduct and document annual inventories independently, the requirement is rated **Partially Met**.

Recommendations

Build Internal Staff Capacity

- Train the designated librarian and at least one additional staff member in inventory processes, metadata entry, and the use of the Little Library catalog system.
- Provide refresher training at the start of each school year to maintain continuity.

Maintain a Step-by-Step Inventory Guide

- Create a living digital or physical guide that includes step-by-step instructions for conducting inventories, updating metadata, and generating reports so the process is repeatable across years and staff changes.

25 CFR §36.41, Standard XIV - Textbooks

25 CFR §36.41, Standard XIV – Textbooks, falls under Subpart E: Instructional Support and includes **three core subsections**. Based on this year’s assessment, HES is **compliant with all 3 of the 3 requirements**, with no partially-met, non-compliant, or not-applicable determinations. This results in a **100% compliance rate** for §36.41, an improvement from the **33% compliance rate** reported in February 2025.

Legal Citation: §36.41(a)
(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.

Requirement Met
 Partially Met
 Non-Compliance
 Not Applicable

Regulation Status Summary

The school board approved the textbook review committee on March 4, 2026. The committee consists of two teachers, the student council president and vice president, the school counselor, the principal, and the school board. This structure meets the requirements for representative membership and board-approved appointment.

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
 Partially Met
 Non-Compliance
 Not Applicable

Regulation Status Summary

Standard Operating Procedures (SOP) for textbook review were developed and presented to the school board on January 20, 2026. The school board approved the textbook review committee on March 4, 2026. A textbook review guide and supporting resources were provided to the board on April 14, 2026, along with physical samples of textbooks for review.

Additionally, an MS Forms link was distributed to school board members, staff, and students to collect feedback on the school curriculum. Responses were collected by May 5, 2026, and compiled into a spreadsheet for analysis. This process demonstrates a clear, documented procedure that meets the regulatory criteria.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The school maintains updated inventories of all property, equipment, and textbooks distributed to teachers. Documentation verifies that each teacher receives the instructional materials necessary for the grade levels and content areas they teach. This process supports equitable distribution and proper inventory management.

25 CFR §36.42, Standard XV - Counseling Services

25 CFR §36.42, Standard XV – Counseling Services, falls under Subpart E: Instructional Support and includes **five core subsections**. Based on this year’s assessment, HES is **compliant with 3 of the 5 requirements, partially compliant with 2**, and has **no non-compliant or not-applicable determinations**. This results in a **60% compliance rate** for §36.42, an improvement from the **46.67% compliance rate** reported in February 2025.

Legal Citation: §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.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is compliant with this requirement. Counseling services address physical, social, emotional, intellectual, and career development needs. Counselors deliver SEL lessons that incorporate self-care, stress management, hygiene education, mindfulness, bullying prevention, digital citizenship, peer pressure, and leadership. Breathwork and wellness strategies were observed during site visits. Middle-school students participate in career exploration activities, leadership development, and academic counseling.

The counselor also serves as the school testing coordinator and follows all required protocols for BIE assessments, including staff training and documentation of security procedures. These practices demonstrate a comprehensive approach to supporting students’ overall growth and align with regulatory expectations.

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.
- (2) Schools shall use some form of performance-based or authentic assessment in addition to standardized achievement testing.
- (3) Each school shall report the summative results of its assessment program to its respective Agency or Area, as appropriate, and its school board.
- (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.
- (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.
- (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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES met all assessment-related requirements under this section. The school administered the BIE assessment in Spring 2026 to all required grade levels. As the BIE Chief Academic Office manages record-keeping and reporting, all state-level and federal submission requirements are automatically fulfilled.

HES supplements required assessments with BIE interim assessments and i-Ready for ongoing progress monitoring, meeting the requirement for performance-based or authentic assessments. Assessment results were shared with families in the fall and presented to the school board on August 19, 2025.

The counselor, serving as the testing coordinator, trained all staff, and staff signed assessment security agreements. These documented practices confirm that all components of §36.42(a)(1) were fully implemented.

Legal Citation: §36.42

(b) 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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES meets this requirement by employing one full-time BIE counselor, supported by two contracted social workers who provide supplemental counseling services.

Legal Citation §36.42

(b)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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School’s counselor has demonstrated strong personal initiative in developing familiarity with the tribal, social, and economic context of Havasupai students. She has purchased and read books related to Havasupai history and culture, reviewed resources shared by tribal and school partners, and actively participated in local community events. Through these efforts, she has built meaningful relationships with students and families and incorporates cultural awareness into her day-to-day counseling practices.

However, these efforts remain individual and informal, rather than part of a consistent, schoolwide system. HES does not yet have a structured and sustainable onboarding process to ensure that all current and future counselors, whether BIE staff or contracted, receive training on Havasupai culture, community expectations, demographics, and culturally responsive counseling approaches. While cultural values are briefly referenced in the Counseling SOP, there are no accompanying procedures, training modules, or implementation steps to ensure that cultural understanding is consistently developed, reinforced, and evidenced across counseling staff over time. This lack of a standardized system prevents the school from demonstrating that the requirement can be met sustainably beyond the efforts of the current counselor.

Because the counselor has taken meaningful individual steps to build cultural understanding, but the school does not yet have a documented, repeatable system to ensure all counselors receive consistent cultural onboarding and training, the requirement is rated **Partially Met**.

Recommendations

Develop a formal counselor onboarding process that includes cultural training, demographic information, and clear expectations for collaboration with tribal departments. Counselors should review and sign this annually.

- Include the counselor in the BIE One Plan process so demographic and cultural data can inform SEL goals and counseling program priorities.
- Collaborate with facilitators to design cultural learning experiences and strengthen community partnerships that support culturally responsive counseling.
- Utilize the cultural resource document created by facilitators to build a consistent onboarding packet and ongoing reference guide for all counselors.

Technical assistance to design a sustainable cultural onboarding system for counselors.

- Support from facilitators and tribal/community partners to identify community members who can assist with and provide regular cultural learning opportunities.

Legal Citation §36.42

(b)The counseling program shall contain the following:

(3)

- (i) A written referral procedure;
- (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;
- (iii) Preventative and crisis counseling on both individual and group bases;
- (iv) Confidentiality and security of counseling records for each student; and
- (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.
- (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.
- (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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Referral Procedures:

HES has a written referral procedure that was reviewed during staff training. All staff received both electronic and hard copies, ensuring consistent and ready access to the process.

Counseling Techniques and Documentation:

Counselors and contracted social workers provide individual and group counseling addressing academic, social, personal, and career needs. Documentation is maintained through counselor records and gradebooks. Students engage in career exploration using platforms such as Choices360 and PAWS in Jobland. However, the counseling program does not yet have a system to ensure that counseling techniques are consistently grounded in the cultural beliefs and values of Havasupai students.

Preventative and Crisis Counseling:

Preventative and responsive supports are delivered through small-group sessions, SEL instruction, and Eagle Support interventions. These structures provide regular opportunities for timely assistance.

Confidentiality and Records Security:

Counselors maintain student counseling records in locked file cabinets, and confidentiality expectations are outlined in the counseling handbook, ensuring adherence to privacy standards.

Orientation and Transition Supports:

Transition activities include virtual presentations, guest speakers, high school night, individual transition assistance, and a counselor-facilitated visit to Riverside School. These supports help prepare students for transitions between grade levels and on to high school.

Academic and Career Counseling:

Middle school students receive academic and career counseling at least twice per year. They complete aptitude assessments and develop written academic and career plans aligned with their strengths and interests, meeting this component of the regulation.

Overall Summary:

HES has implemented many components of a comprehensive counseling program, including referral procedures, confidentiality safeguards, academic and career counseling, and transition supports. However, gaps remain in the systematization of culturally grounded counseling practices, as well as in developing unified documentation systems, a formal onboarding process for counseling staff, and a comprehensive counseling program calendar.

Because many components of the counseling program are implemented, but the school does not yet have a structured and sustainable system to ensure cultural alignment, consistent documentation, and ongoing training for all counseling staff, the requirement is rated **Partially Met**.

Recommendations**Develop a comprehensive counselor onboarding guide updated annually, including cultural expectations, procedures, and program components.**

- Establish a schoolwide counseling program calendar outlining monthly responsibilities (transition supports, SEL cycles, career lessons, progress monitoring, etc.).
- Include counselors in the BIE One Plan process to ensure demographic and academic data informs counseling goals and supports.
- Coordinate proactively with Head Start to prepare for the SEL and counseling needs of incoming kindergarten students.
- Continue refining documentation processes to ensure consistency across counselors and contracted social workers.
- Support in developing a culturally grounded counseling framework for Tier 1, Tier 2, and Tier 3 services.
- Assistance from tribal representatives, facilitators, and community partners to integrate cultural values and community perspectives into counseling practices and transition planning.

25 CFR §36.43, Standard XVI - Student Activities

25 CFR §36.43, Standard XVI – Student Activities, falls under Subpart E: Instructional Support and includes **ten core subsections**. Of these, **six requirements were compliant**, and **four were not applicable**, with no partially met or non-compliant determinations. This results in a **100% compliance rate for all applicable requirements**, a major increase from the **16.67% compliance rate** reported in February 2025.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Havasupai Elementary School maintains a well-balanced student activities program that reflects student interests and community priorities. Throughout SY 2025–2026, the school expanded its offerings to support academic enrichment, physical activity, and leadership development. After school activities officially launched in February 2026 following staff training, scheduling, and the development of the Schoolwide Activity Plan.

Students engage in:

- Adventure, Endurance, and Recreation Club
- Supai Chefs (cooking club)
- Tutoring
- LEGO STEAM Club
- Chicken Husbandry
- Sports Club & Basketball
- Coding Club
- Yearbook/Photography
- Hydroponics

These activities are aligned with the Schoolwide Activity Plan presented to the school board and are integrated into the broader educational program, as required by regulation.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

All student activities at HES have designated qualified sponsors, and activities are approved by the school supervisor. The Schoolwide Activity Plan was presented to the school board in fall 2025 and approved on March 4, 2026. Sponsors are professional staff members who supervise clubs and afterschool activities.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Each activity sponsor submitted a completed activity operations plan at the start of programming. Plans were uploaded to SharePoint and included the required component's purpose, structure, coordination, and operational details. Both the School Principal and the sponsor signed each plan.

Activities are currently funded through the 21st Century grant and do not use fundraising.

Legal Citation: §36.43

(c) Schools 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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES does not participate in interscholastic sports due to its remote location, lack of neighboring schools for league participation, and limited access to competitive athletic programs. Therefore, this requirement does not apply.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Since HES does not participate in interscholastic athletics or competitive sports programs, this requirement is not applicable. No students are barred from participation because no interschool competition exists at this time.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES is not a residential school and therefore does not provide residential intramural programming. General physical activity and student clubs are offered through the school day and afterschool structure, but the residential requirement does not apply.

Legal Citation: §36.43

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Students at HES participate only in school-sanctioned activities with appropriate supervision. All clubs and afterschool programs operate under approved plans with qualified staff oversight. No unsanctioned activities were identified.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES does not operate student activity fundraising accounts under 25 CFR §31.7. All activities are funded through the 21st Century grant; therefore, no audits are required.

Legal Citation: §36.43

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

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES ensures student safety across all school-sponsored activities. Staff received supervision and safety training prior to the February 2026 launch of afterschool programming. Activities take place on school grounds with appropriate ratios and safety procedures aligned with BIE guidance.

Each activity plan also includes safety protocols and strategies specific to that activity.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

Sponsors received orientation from the 21st Century Grant coordinator before after school programs launched in February 2026. Training included supervision expectations, safety protocols, documentation requirements, and alignment with the Schoolwide Activity Plan.

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 and includes **three core requirements**. Based on this assessment, HES is **compliant with all 3 of the 3 requirements**, with no partially-met, non-compliant, or not-applicable determinations. This results in a **100% compliance rate**, consistent with the **100% compliance rate** reported in February 2025.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

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. This Accreditation is valid through 6/30/2029.

Legal Citation: §36.50

(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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES met this requirement because, in October 2024, following a formal formative evaluation, HES received district accreditation along with the Phoenix 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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

HES has met this requirement because 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 comprehensive needs assessment, root cause analysis, SMART goals, a program plan, and a budget. The OnePlan is reviewed by the ERC staff and leadership, as well as by 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 and includes **five core requirements**. Based on this assessment, HES is **compliant with all 5 of the 5 requirements**, with no partially-met, non-compliant, or not-applicable determinations. This results in a **100% compliance rate**, a significant improvement from the **25% compliance rate** reported in February 2025.

Legal Citation: §36.51

(a) 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.

- Requirement Met
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

BIE's Chief Performance Office (CPO) coordinated a full Onsite Fiscal and Programmatic Monitoring Review from January 12–15, 2026. During this review, BIE evaluated HES's compliance with federal statutory and regulatory requirements, including sections of 25 CFR Part 36.

Following the visit, the CPO issued the Draft Monitoring Report and Technical Assistance Plan on February 25, 2026, which was shared with school leadership, the School Board, and the Havasupai Tribe. The Final Monitoring Report was issued on April 28, 2026. HES will continue to participate in the required three-year monitoring cycle.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

The CPO, the ERC, and the EPA collaboratively conducted the Onsite Fiscal and Programmatic Monitoring Review during the week of January 12, 2026. This review, which included onsite interviews, program walkthroughs, document reviews, and compliance checks, fulfilled the regulatory requirement for Agency-level monitoring.

The School Board was invited to participate through scheduled interviews, providing an opportunity for board input and fulfilling the requirement for joint involvement. Consistent with §36.51(b), the School Board and school leadership received the Final Monitoring Report and Technical Assistance Plan on February 25, 2026, followed by the final version on April 28, 2026, ensuring timely communication following the onsite visit.

HES remains scheduled for continued monitoring within the required three-year cycle.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

This requirement is rated as compliant because Havasupai Elementary School maintains the records necessary to demonstrate conformance with Part 36 and consistently submits accurate reports to the responsible BIE officials as required. HES keeps organized documentation—including activity plans, inventories, training records, committee approvals, and compliance evidence—which supports monitoring under §36.51 and aligns with the consolidated indicators identified by the Chief Performance Office.

HES also complies with reporting expectations by participating in formal monitoring and evaluation processes, including the BIE Annual Summative Evaluation for §36.51, which requires the submission of accurate, complete data and documentation.

Additionally, during the onsite Fiscal and Programmatic Monitoring visit in January 2025, HES provided BIE staff with timely access to all requested documents and records, enabling reviewers to verify compliance across multiple regulations.

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

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
- Partially Met
- Non-Compliance
- Not Applicable

Regulation Status Summary

CPO, in collaboration with WestEd, completed the required annual summative evaluation of Bureau policies and procedures for SY 2025–2026. The purpose of this evaluation is to determine whether current policies assist or hinder schools in meeting the requirements of Part 36 and to identify systemic barriers that impact compliance at the school level.

The final summative evaluation was submitted to the Director of BIE on March 20, 2026, meeting the annual submission requirement set forth in §36.51(e). This timely completion, external collaboration, and alignment with required evaluation components justify a rating of “Requirement Met.”

2026 HES Annual Compliance Assessment Summary

Following is a summary of the results of the Havasupai Elementary School June 2026 Annual Compliance Assessment Report. The subsequent work plans will focus on the areas of non-compliance identified in this report and sustainability of compliance.

25 CFR § 36.11, Standard II for Administrative Requirements falls under Subpart B – Educational Management.			
	Requirement Met	Partially Met	Not Applicable
§36.11(a)– Staffing	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	Partially Met	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(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	Partially Met	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) – Kindergarten Instructional Program	X		

25 CFR § 36.22, Standard VII – Elementary Instructional Program falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Partially Met	Not Applicable
§36.22(a) – Elementary Instruction Program	X		
§36.22(b) – School shall integrate content area into curriculum	X		

25 CFR § 36.23, Standard VIII – Junior High/Middle School Instructional Program falls under Subpart C – Minimum Program of Instruction.			
	Requirement Met	Partially Met	Not Applicable
§36.23(a) – Instruction Program Philosophy and a progressive development from elementary program to the secondary program.		X	
§36.23(b) – Curriculum shall include required instruction content	X		
§36.23(c) – Content area shall be integrated into curriculum	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	Partially Met	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	Partially Met	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		

25 CFR § 36.40, Standard XIII – Library/media program falls under Subpart E – Instructional Support.			
	Requirement Met	Partially Met	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)(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	Partially Met	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	Partially Met	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) - 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(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) - The counseling program components		X	

25 CFR § 36.43, Standard XVI – Student Activities falls under Subpart E – Instructional Support.			
	Requirement Met	Partially Met	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	Partially Met	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 school'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	Partially Met	Not Applicable
§36.51(a)- 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.	X		
§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.	X		
§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.	X		
§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.	X		
§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	X		

policy and administrative procedure assists or hinders schools in complying with the requirements of this part.			
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