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Havasupai Elementary School Work Plan

Updated March 2025

Background and Overview

In 2023, the Bureau of Indian Education (BIE) entered into a settlement agreement with the plaintiffs in the case of *Stephen C., et al. v. Bureau of Indian Education, et al.*, No. 3:17-cv-08004-SPL (D. Ariz.). This Settlement Agreement addresses concerns regarding BIE's compliance with 13 regulations at Havasupai Elementary School (HES). The regulations involved are detailed in [25 C.F.R Part 36](#), which outlines Minimum Academic Standards for the Basic Education of Indian Children and National Criteria for Dormitory Situations. The specific regulations covered by the 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.

As mandated by Section B of the Settlement Agreement, the Department of the Interior (DOI), BIE created a Compliance Specialist position responsible for overseeing the implementation of compliance measures at HES (Section B-1). The Compliance Specialist was also required to complete an initial compliance assessment within three months of starting the position (Section B-2). This assessment was finalized on February 12, 2024, and is available [here](#).

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

In accordance with Section B-2-c of the Settlement Agreement, the Compliance Specialist will issue an annual report on BIE's compliance status with the 13 regulations, starting one year from the date of the initial assessment. The draft of this report was completed on February 12, 2025, with the final version posted online by March 13, 2025. Following the release of the annual report, a revised written work plan will be issued within 30 days, and it will continue to be updated every 90 days. This work plan will be adjusted to address any areas of non-compliance identified in the annual report.

Havasupai Elementary School 90-Day Work Plan

The 2025 Annual Report on Havasupai Elementary School's compliance with the 13 regulations highlights the school's progress since the initial assessment in 2024. While significant advancements have been made in various areas, not all aspects of school performance can be quantified by these regulations.

Since the initial assessment, HES has established a school board, enhanced school-wide routines and procedures, and improved crucial systems such as attendance tracking, NASIS management, and document organization by creating a dedicated SharePoint site. Additionally, the school has implemented substantial safety and facility improvements. Despite these efforts, HES was marked as non-compliant in 71 out of the 101 regulatory requirements assessed.

Through the annual report, three urgent areas for improvement have been identified as priorities: instructional leadership, tribal and community involvement, and addressing student non-academic needs. Focusing on these areas is expected to enhance compliance significantly and improve educational outcomes for students.

This updated work plan specifically addresses the regulations for which HES received non-compliant ratings. It aims to foster transparency and accountability by outlining adjusted action steps and timelines. The plan identifies responsible BIE staff and specifies monitoring activities along with success criteria.

Progress updates, resources, and any necessary expenditures beyond the existing HES budget will be reported on an ongoing basis and posted on the BIE website every 90 days. The work plan will be updated every 90 days, with the next update scheduled for publication in July 2025. These work plans are designed to ensure that each student at HES experiences a high-quality education and is well-prepared for high school, college, career, and community life.

To inquire about this work plan, please contact Ms. Frankie Chretien at frances.chretien@bie.edu or (771) 233-7521

HES Compliance Timeline and Activities 2025-2026

TIMELINE	ACTIVITY	RESPONSIBILITY
March 12, 2025	Issue written work plan	Compliance Specialist, BIE
March 21, 2025	Copy of written work plan provided to Assistant Secretary-Indian Affairs, BIE Director, Facilitator, Plaintiffs, Havasupai Tribal Council	Compliance Specialist, BIE; Management Analyst, BIE; Solicitor, BIE; and Education Program Administrator, BIE
April 11, 2025	Post written work plan at Havasupai Elementary School Bureau of Indian Education (bie.edu)	Compliance Specialist, BIE, and Communications Director, BIE
June 10, 2025 September 8, 2025 December 5, 2025	Issue 90-day update written work plan	Compliance Specialist, BIE
June 19, 2025 September 17, 2025 December 16, 2025	Copy of 90-day update written work plan provided to Assistant Secretary-Indian Affairs, BIE Director, Facilitator, Plaintiffs, Havasupai Tribal Council	Compliance Specialist, BIE; Management Analyst, BIE; Solicitor, BIE; and Education Program Administrator, BIE
July 10, 2025 October 8, 2025 January 2, 2025	Post 90-day work plan at Havasupai Elementary School Bureau of Indian Education (bie.edu)	Compliance Specialist, BIE, and Communications Director, BIE
February 12, 2026	Issue annual report on status of BIE's compliance with 13 regulations at issue	Compliance Specialist, BIE
February 18, 2026	Copy of annual report provided to Assistant Secretary-Indian Affairs and BIE Director	Compliance Specialist, BIE and Management Analyst, BIE
February 24, 2026	Copy of annual report provided to Facilitator, Plaintiffs, and Tribal Council.	Compliance Specialist, BIE; Solicitor, BIE; and Education Program Administrator, BIE
March 13, 2026	Post annual report at Havasupai Elementary School Bureau of Indian Education (bie.edu)	Compliance Specialist, BIE, and BIE Communications Director

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25 CFR §36.11 Standard II - Administrative Requirements

Legal Citation: 25 CFR §36.11(a)(5): *Staffing*. Each school shall, at a minimum, meet the following requirements:

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

Monitoring (who, when, how):

- Compliance Specialist will monitor tracking documentation for utilization and accuracy during site visits.

Success Criteria:

HES will employ an intermittent certified substitute teacher and utilize a tracker for class coverage as evidence of compliance.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is rated as non-compliant with this regulation due to the following reasons: The school counselor was assigned to teach the 3rd- 4th grade classroom from September 3rd through December 20th. She does not possess teaching credentials, and this assignment exceeded the 20-day limit stipulated in the regulation. Additionally, a school paraprofessional without teaching credentials is assigned to the kindergarten class from September 13th until the position is filled. This assignment also exceeds the 20-day requirement outlined in the regulation.
BIE Staff Responsible	Principal, Secretary, Education Program Administrator, Business Technician, Chief Performance Office (CPO) staff
Resources	There may be local community members who are interested in obtaining their certification to become substitute teachers. This link is to the Arizona substitute teacher qualifications and process for obtaining a certificate: https://www.azed.gov/educator-certification/substitute-prek-12

Action Steps	Timeline
1. Create a recruitment/retention plan that includes recruiting certified substitute teachers.	June 2025
2. Collaborate with the facilitator and school board to host community outreach events to support and encourage community members in applying to work at the school.	August 2025
3. Review state substitute requirements and encourage non-instructional school staff to become certified substitutes.	ongoing

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.

Monitoring (who, when, how):

- Compliance Specialist will check student immunizations in NASIS and/or review the school's Indian Student Equalization Program (ISEP) monitoring report to ensure all students comply with immunization requirements.

Success Criteria:

HES will have updated student immunizations that meet the regulations and requirements of the state or Indian Health Service (IHS) for every student. In addition, documentation of parent/guardian contact for students missing immunizations will be evidenced through NASIS, student records, and parent contact logs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	On 3/5/25 The School principal collaborated with the Public Health Nurse and the Supai clinic to review all immunizations. The nurse identified students who needed updated immunizations. The school is working on a form to notify parents.
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Annual Report Finding	Havasupai Elementary School is rated as non-compliant with this regulation for the following reasons: While HES collects and uploads a copy of each student's immunization record to the Native American Student Information System (NASIS) during student registration, there is no established system to monitor whether these immunizations meet the requirements outlined by the state or the Indian Health Service (IHS). During the 2024 Fall ISEP review, although all but a few students had documented immunizations, the school is still actively working to obtain the required immunization records for these students. The absence of a monitoring system compromises HES's ability to ensure comprehensive compliance with the immunization requirements.
BIE Staff Responsible	Principal, counselor, ADD-BOS student behavior health program specialist, Registrar/Secretary, ADD-BOS management analyst
Resources	Public Health Nurse Supai Health Station may be a partner for health-related resources and learning opportunities for students, families, and staff. Staff may benefit from professional learning about Arizona's school immunization guidance https://www.azdhs.gov/documents/preparedness/epidemiology-disease-control/immunization/school-childcare/nofollow/school-childcare-immunization-guide.pdf

Action Steps	Timeline
1. Work to update the existing MOU with Indian Health Services (IHS) to include the public health nurse(s) to assist with monitoring immunizations.	August 2025
2. Collaborate with IHS to review immunization records to ensure all students are immunized according to state or IHS standards.	March 2025
3. Utilize the state checklist to review immunizations	March 2025
4. Create and utilize templates for parent notification when missing immunizations	March 2025
5. Upload the parent notification template to the School's SharePoint site	May 2025

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

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.

Monitoring (who, when, how):

- Compliance Specialist will review lesson plans during site visits.
- Compliance specialist will look for evidence of multi-culture dimensions through classroom walkthroughs.
- Compliance specialist will monitor documentation of training and Professional Learning Communities (PLCs)

Success Criteria:

HES will have evidence of multi-culture dimensions as evidenced through lesson plans, classroom observations, and policies.

Funding /Expenditures necessary:

A potential funding expense may be for Staff training on Multicultural dimensions.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Multi-Cultural and Multi-Ethnic Integration in the Curriculum: HES is rated as non-compliant due to the absence of clear expectations or plans for incorporating multi-cultural and multi-ethnic dimensions into the educational program. Although some elements may be included in the selected curriculum, there are insufficient lesson plans to adequately demonstrate the effective implementation of these components.
BIE Staff Responsible	Principal, Teachers, Counselors, ADD-BOS Culture and Language Specialist, ADD-BOS Curriculum and Instruction Specialist
Resources	<p>From Beliefs to Action: Designing Culturally-Responsive Systems https://weeac.wested.org/library/?_resource_type=webinar&_topic=culturally-responsive-systems This webinar series features strategies to navigate the core tensions experienced by educators when discussing race and equity, a foundational understanding of how beliefs, policies, procedures, and practices contribute to racial inequities, and skills to steer conversations that promote understanding, empathy, and collaboration while addressing potentially sensitive topics. The series addresses manifestations of culture within schools and classrooms and culturally responsive family and community engagement</p> <p>Culturally Responsive Instruction for Native American Students https://csaa.wested.org/spotlights/culturally-responsive-instruction-for-native-american-students/</p> <p>Professional learning series on culturally responsive instruction for American Indian students. This series provides a framework for instruction that emphasizes experiential, active, and student-centered learning. This framework assists all teachers in working with Native students but is also</p>

	relevant to developing an understanding that supports approaching Native subject matter. CRESTT, UCLA, WestEd.
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Action Steps	Timeline
1. Establish a lesson plan template with a requirement for multi-culture and multi-ethnic dimensions.	April 2025
2. Create opportunities for PLCs for professional development and support for teachers.	Ongoing SY 2024-2025
3. Develop a system for monitoring through lesson plan reviews, classroom observations, and walkthroughs.	May 2025
4. Examine school policies and practices to ensure an empowering school culture and social structure.	Through the Comprehensive needs assessment process 2025

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

- Monitoring (who, when, how):**
- Compliance Specialist will review curriculum documents upon development by HES.
 - Compliance specialist will review the program and documentation of tribal approval.

Success Criteria:
HES will have a language arts program that assesses English and Native Language abilities. It will also teach or maintain English, and the Native Language with Havasupai Tribal approval as evidenced through assessment, curriculum map, tribe-approved program, and lesson plans.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	<p>Havasupai Elementary School is rated as non-compliant with this regulation for the following reasons:</p> <p>While the school effectively assesses and provides instruction in English through various means, such as classroom instruction, i-Ready, and BIE assessments (including Pearson-Interim assessments), there is currently no data tracking system in place to monitor the assessments conducted within the Language and Culture program.</p> <p>Although this program has received approval from the Tribal Council on January 29, 2025, there is a lack of documented assessments or evidence of student growth in the native language instruction.</p>
BIE Staff Responsible	Principal, Culture teacher, ADD Culture and language specialist, Facilitator
Resources	<p>Publicly available Resources related to Culturally responsive regulations.</p> <p>American Indian Indigenous Teacher Education Conference https://nau.edu/college-education/annual-indigenous-teacher-education-conference/</p> <p>Northern Arizona University's College of Education will host the 15th American Indian/Indigenous Teacher Education Conference (AIITEC) on June 19-21, 2025. The sessions offer knowledge, practices, networking, and practical teaching solutions. Participants will learn strategies they can use immediately across all grade levels and subjects.</p>

Action Steps and Timeline are on the next page.

Action Steps	Timeline
1. The ADD BOS culture and language specialist will collaborate with the Culture and language teacher and tribe to develop a native language assessment for each grade level.	August 2025
2. Create a lesson plan template for the culture and language template that is simple to fill in and documents oral assessments given.	April 2025

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

Monitoring (who, when, how):

- Compliance Specialist will check professional development training documentation materials for culturally relevant instruction, including but not limited to agendas, sign-in sheets, and presentation materials.
- Compliance Specialist will review documentation of orders and resources available on campus for the inclusion of native culture in all curriculum areas.
- Compliance Specialist will review lesson plans and conduct classroom walkthroughs to verify the inclusion of Native American culture in all curriculum areas.

Success Criteria:

HES will have an instructional program that includes Native American culture in all curriculum areas as evidenced by developed content, lesson plans, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for Literature and resources on Native American culture and culturally relevant instruction training.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Insufficient Integration of Native Culture Across Curriculum Areas: HES is rated as non-compliant due to the lack of established expectations, plans, or identified resources to effectively integrate native culture across all curriculum areas. Although native culture is offered on a rotational basis for 45 minutes each day from Monday to Thursday, this instruction does not effectively connect or collaborate with classroom instruction in other subjects. While some teachers may incorporate aspects of Havasupai or Native culture into their lessons, these efforts are inconsistent and not formally expected or documented in lesson plans.
BIE Staff Responsible	Principal, Culture and Language teacher, ADD-BOS Culture and Language Specialist, Facilitator
Resources	<p>Native Knowledge 360 https://americanindian.si.edu/nk360/professional-development/upcoming-webinars These live and interactive programs introduce educators to NK360° and its extensive resources. Webinars are designed to support education professionals in learning approaches to incorporate more complete narratives about Native American histories, cultures, and contemporary lives into their teaching.</p> <p>Lesson Plans Native Knowledge 360 is a site for teaching and learning curated by the Smithsonian's National Museum of the American Indian.</p> <p>Blog</p>

Supporting Native American Students Through Culturally Relevant Education
REL West
<https://ies.ed.gov/ncee/rel/Products/Region/west/Blog/107352>

Action Steps	Timeline
1. Work with the facilitator and school board to acquire Havasupai cultural resources from the tribe and community.	Ongoing SY 2024-2025
2. Order Literature and resources or utilize current resources for Native American culture. Contingent on library inventory	August 2025
3. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements including Native American Culture.	April 2025
4. Submit all content developed to the tribe for approval.	September 2025
5. Implement culturally enhanced STEAM curriculum and activities into classroom instruction. Pilot the kindergarten classroom.	April 2025

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

Monitoring (who, when, how):

- Compliance Specialist will review lesson plans for evidence of instruction based on a learning style assessment.
- Compliance specialist will review data from assessments from each class to ensure the assessment was administered.

Success Criteria:

HES will have data on student learning styles that drive instructional activities as evidenced through lesson plans, classroom walkthroughs, and data binders/files.

Funding /Expenditures necessary:

A potential funding expense may be for the purchase of an electronic learning style assessment.

Progress:	
Annual Report Finding	<p>Havasupai Elementary School is rated as non-compliant with this regulation due to the following reasons:</p> <p>Absence of Learning Style Assessment System: HES has not yet implemented a system to assess the learning styles of its students, which is necessary to provide instruction based on those assessments.</p> <p>Training Conducted but Insufficient: While HES conducted training on January 10, 2024, focusing on Learning Styles and introduced the VARK learning styles assessment, challenges remain regarding the suitability of assessments for all grade levels.</p> <p>Inappropriateness of Current Assessment Tools: The VARK assessment is suggested for children aged 12 and older, raising concerns about its appropriateness for younger students, thereby necessitating a search for alternative assessments that are universally applicable across different age groups.</p>
BIE Staff Responsible	Principal, teachers, ADD BOS curriculum and Instruction Specialist
Resources	<p>How Teachers use Gardner’s Multiple Intelligences Theory</p> <p>This article explains Gardner’s Multiple Intelligences theory, which proposes ways educators may address students’ varied strengths and improve teaching strategies.</p>

Action Steps	Timeline
1. Research and select a learning style assessment for each grade band.	April 2025
2. Teachers will administer assessments and compile data	April 2025
3. Acquire resources and training for teachers by content area and grade level for different learning styles and add them to a SharePoint folder for teachers to utilize while planning instruction.	April 2025
4. Provide PLC time for teachers to gain support with planning lessons that meet student learning style needs	Ongoing SY 2024-2025
5. Develop a lesson plan template that includes documentation of learning style activities utilized.	April 2025

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.

Monitoring (who, when, how):

- Compliance specialist will review the school’s master schedule and documentation to ensure that the school is meeting deadlines for contracting based on the developed timeline.

Success Criteria:

HES will establish and follow a process to have all contracts for services in place before the start of the school year as evidenced by a procurement list, contracts, and a master schedule.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is rated as non-compliant with this regulation due to the inability to provide all intraschool programs consistently from the beginning of the school year through to the end. While the school started with offerings in Physical Education (PE), Library, and Native Language and Culture, several issues affected the continuity of these programs: Library services were discontinued earlier in the year following the resignation of the contractor. PE was available from the beginning of the school year until December 2024; however, the contracted PE teacher resigned at the end of December 2024. There have been ongoing staffing shortages and no available housing for the required staff to support all intraschool programs. Despite these challenges, HES has consistently provided Native Language and Culture classes to all students.
BIE Staff Responsible	HES Assigned contracting officer representative (COR), Principal, Business technician, Budget analyst
Resources	Three Steps to a Strategic Schedule: Creating Effective School Schedules ERS proposes a three-step process for school scheduling that maximizes available resources (people, time, and money) while meeting the needs of students and teachers.

Action Steps	Timeline
1. Review contracts and subscriptions through UDO reports by looking at when they expire and if they have an option year.	April 2025
2. Develop a procurement list that identifies the needs of the school.	May 1, 2025
3. Schedule a meeting with the leaders and teams for BIE contracting, finance, and ADD to develop a timeline and actions to have services in place before the start of the school year.	May 15, 2025
4. Create a master schedule that includes all intraschool programs from the beginning of the school term through the close of the school term.	August 2025

25 CFR §36.21 Standard VI - Kindergarten Instructional Program

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.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans and conduct walk-throughs during site visits for language and Native language requirements.
- Compliance specialist will review walkthrough documentation.

Success Criteria:

HES will implement a curriculum emphasizing language development and Havasupai’s native language as evidenced through lesson plans and classroom observations.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	<p>Havasupai Elementary School is currently rated as non-compliant with this regulation for several key reasons:</p> <p>Curriculum Implementation: While HES uses the SAVVAS curriculum for kindergarten, which emphasizes language development, there are significant gaps in documentation and lesson planning.</p> <p>Native Language Instruction: Although Native language and culture are provided for 45 minutes every fifth full school day, there is no evidence of consistent lesson plans or documentation to demonstrate compliance with the required regulations.</p> <p>Social-Emotional Learning (SEL): The addition of a school counselor who provides SEL lessons for all students is a positive step towards helping students develop positive feelings toward themselves and others. However, the impact of this may not be fully integrated into the kindergarten curriculum due to a lack of structured, consistent lesson documentation and SEL classes starting in December 2024.</p>
BIE Staff Responsible	<p>Kindergarten teacher, Principal, Facilitator, ADD-BOS curriculum and instruction specialist, ADD-BOS Culture and language specialist</p>
Resources	<p>Developmentally Appropriate Practice in Kindergarten: Observation Guide https://www.wested.org/resources/developmentally-appropriate-practice-in-kindergarten-observation-guide/</p> <p>The guide provides the following sections to use when observing for and identifying evidence of developmentally appropriate practice: Safe and Supportive Environments, Responsive Developmental Relationships, Family Engagement, Curriculum and Instruction, Motor Development, Literacy and Language Development.</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Develop a uniform lesson plan template to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Review lesson plans weekly by administration and BIE staff to ensure quality and adherence to regulatory requirements.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: 25 CFR §36.21(b)(1-5)

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

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

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

The HES kindergarten instructional program will include Exploration of the environment psychomotor and socialization development, or development of imaginative and creative tendencies as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Curriculum Components: Although the SAVVAS curriculum encompasses components necessary for compliance, including language development, exploration of the environment, and socialization development, there is insufficient documentation (lesson plans) to substantiate implementation in each of these areas. Physical Education and Health Education: While health education was covered through Physical Education (PE) during the first half of the school year, the absence of sufficient lesson planning limits the ability to demonstrate compliance.
BIE Staff Responsible	Kindergarten teacher, Principal, ADD-BOS curriculum and instruction specialist
Resources	Joyful Literacy with Young Children https://www.wested.org/joyful-reading-writing-and-creative-expression-with-young-children/ Joyful Literacy is an evidence-based, culturally and linguistically sustaining, and whole-child approach to support young children's literacy development. The approach integrates socio-emotional learning strategies and creative expression activities with evidence-based early literacy practices. When engaged with these practices, children develop language, literacy, and critical thinking skills while also learning how literacy can be creative, evoke feelings of joy, and cultivate a sense of belonging in school.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025
4. Support and training will be provided through PLCs and Savvas (curriculum) professional development.	Ongoing SY 2024-2025

25 CFR §36.22 - Standard VII - Elementary Instructional Program

Legal Citation: 25 CFR §36.22(a)(1-4)

(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.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES Elementary's instructional program will include Math, Social Studies, and Science, as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	<p>Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:</p> <p>Curriculum Implementation: The SAVVAS curriculum has been adopted for English Language Arts (ELA), Mathematics, Social Studies, and Sciences for the 2024-2025 school year. These subjects are included in the master schedule, but inconsistencies in lesson planning have been noted: Lesson plans collected by the principal are often incomplete and lack sufficient detail. Many are printed from online resources, providing unclear execution timelines for when lessons are taught.</p> <p>There is a significant absence of lesson plans for Social Studies and Science, affecting the ability to demonstrate compliance and effective curriculum delivery.</p>
BIE Staff Responsible	Elementary teachers, Principal, ADD-BOS curriculum and instruction specialist
Resources	<p>Native Knowledge 360, Smithsonian's National Museum of the American Indian https://americanindian.si.edu/nk360/lessons-resources/search-resources</p> <p>The site has a search feature for locating cross-disciplinary lesson plans at different grade levels, including Math, Social Studies, and Science.</p>

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025
4. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
5. Support and training will be provided through PLCs and SAVVAS (curriculum) professional development.	Ongoing SY 2024-2025

Legal Citation: 25 CFR §36.22(a)(5)

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

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will have an instructional program that includes Fine Arts as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:

Possible funding source- Title IV-A well-rounded schools

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Fine Arts Instruction: HES does not formally offer fine arts as part of its instructional programs. Although some staff may incorporate elements of fine arts into their lessons, there are no documented lesson plans or structured programming to demonstrate compliance with the requirement for fine arts education. Importance of Fine Arts: Fine arts are essential for fostering creativity and addressing the diverse needs of students and the community, but their absence is limiting the overall educational offerings.
BIE Staff Responsible	Principal, teachers, ADD-BOS curriculum and instruction specialist
Resources	Institute of American Indian Arts This tribal college may be a source for teachers or guest teachers.

Action Steps	Timeline
1. School will acquire a curriculum, supplies, and resources for Fine Arts.	May 2025
2. Fine Arts will be added to the master schedule to be taught once per week.	August 2025
3. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
4. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	August 2025
5. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	Ongoing SY 2025-2026
6. Work with the facilitator to partner with the tribe and community to find resources/people to teach cultural arts.	Ongoing SY 2025-2026

Legal Citation: §36.22(a)(6)

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

(6) Physical Education.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will have an instructional program that includes Physical Education as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:

Possible funding source- Title IV-A well-rounded schools

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Physical Education Services: A contracted Physical Education (PE) teacher provided services from the start of the school year until December 2024. However, after her resignation, no PE services have been provided to students, hindering their physical education opportunities. Insufficient Documentation: There are no available lesson plans to document the PE instruction that occurred during the first half of the school year, leading to issues with compliance and accountability.
BIE Staff Responsible	Principal, teacher, ADD-BOS curriculum and instruction specialist
Resources	

Action Steps	Timeline
1. Principal will teach PE until the federal hiring freeze ends and a PE teacher can be hired.	February 2025
2. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
3. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
4. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: §36.22(b)(1-2, 4)

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

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

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will integrate career awareness, environmental and safety education, and metric education into the school's curriculum and instructional program, as evidenced by curriculum maps and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Integration of Content Areas: The Savvas curriculum is designed to effectively integrate various content areas into the core curriculum—specifically through: Science curriculum including career connections and safety education. Math and Science curriculums incorporating metric education— there is insufficient documentation to verify that these lessons are consistently taught in classrooms. Lack of Lesson Plans: The absence of consistent and detailed lesson plans means there is no sufficient evidence to show compliance with the integration requirements of career awareness, environmental and safety education, and metric education.
BIE Staff Responsible	Principal, Elementary teachers, School counselor, ADD BOS curriculum, and Instruction Specialist
Resources	Micro-Course Indigenous Pathways in Planning for College, Career, and Community Life https://weeac.wested.org/resource/indigenous-pathways-in-planning-for-college-career-and-community/

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: §36.22(b)(3)

(b) Each school shall integrate the following content areas into its curriculum: (3) Health education (includes requirements contained in 24 Stat. 69),

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES elementary instructional program will include health education as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Health Education Integration: Although Physical Education (PE) was taught during the first half of the school year and included components of health education, there is a lack of sufficient lesson plans to substantiate compliance with health education requirements. This absence of documentation makes it challenging to verify that all required components of health education are being adequately implemented.
BIE Staff Responsible	PE teacher, principal, BOS behavior health coordinator
Resources	<u>KidsHealth in the Classroom</u> KidsHealth in the Classroom offers educators free health-related lesson plans. Each Teacher's Guide includes discussion questions, classroom activities and extensions, printable handouts, quizzes, and answer keys all aligned to National Health Education Standards. Arizona Health Education Standards and Resources <u>https://www.azed.gov/pe/health-education</u>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Health Education will be provided in conjunction with Physical Education.	February 2025
2. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
3. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
4. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: §36.22(b)(5)

(b) Each school shall integrate the following content areas into its curriculum: (5) Computer literacy.

Monitoring (who, when, how):

- Compliance Specialist will review the school's lesson plan template to ensure this requirement is included.
- Compliance Specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will integrate computer literacy into the curriculum as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for computers for each classroom

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Insufficient Integration of Computer Literacy: While some computer literacy programs are utilized in the school, such as i-Ready, Savvas curriculum activities, typing.com, and other resources, the implementation and monitoring of these programs lack clarity. Lack of Documentation: There are no lesson plans available that demonstrate how teachers are intentionally developing and integrating computer literacy skills into lessons and classroom instruction.
BIE Staff Responsible	Principal, Elementary teachers, ADD-BOS Curriculum and Instruction Specialist
Resources	Everything You Need to Teach Digital Citizenship https://www.commonsense.org/education/digital-citizenship This K-12 Digital Citizenship Curriculum provides lesson plans by grade level to address timely topics and prepare students to take ownership of their digital lives. Teacher Digital Learning Guide: TEACHING DIGITAL CITIZENSHIP & SAFETY https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b This guide is designed to provide important resources and recommendations to support teacher implementation of digital learning.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

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

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.

Monitoring (who, when, how):

- Compliance specialist will Review the school's comprehensive needs assessment in plan4learning in July 2025.
- Compliance specialist will review lesson plans during site visits and curriculum maps on the school's SharePoint site once they are complete.

Success Criteria:

HES will implement an instructional program that reflects the school's philosophy and the community's needs as evidenced by data collected during the comprehensive needs assessment. The instructional program shall be a part of progressive development as evidenced through curriculum mapping and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	<p>Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:</p> <p>Lack of Alignment with Community Needs: The instructional program has not been intentionally aligned with the needs of the students and the community. Although a needs assessment was completed, it failed to incorporate comprehensive community input, limiting its effectiveness in addressing student needs.</p> <p>Curriculum Utilization: While the Savvas curriculum has been adopted for reading, math, science, and social studies, the effectiveness of its utilization remains unclear. This raises questions about how well the curriculum contributes to progressive development for students transitioning to secondary education.</p>
BIE Staff Responsible	Principal, teachers, Facilitator, 7/8 th grade teacher, ADD BOS curriculum and Instruction specialist.
Resources	<p>Curriculum Mapping Tips for New Teachers https://www.edutopia.org/article/curriculum-mapping-tips-new-teachers/</p> <p>Sample curriculum maps from Arizona school districts Scottsdale Unified School District https://www.susd.org/academics/curriculum/curriculum-maps Paradise Valley Schools https://www.pvschools.net/academics/curriculum/elementary-k-6-curriculum-overview</p>

Action Steps	Timeline
1. Conduct a comprehensive needs assessment using school data and solicit input from the tribe, community, parents/guardians, students, and staff.	June 30, 2025
2. Create a school philosophy and ensure that it is reflected in its instructional program utilizing data from the comprehensive needs assessment.	July 30, 2025
3. Teachers will utilize the selected curriculums for Reading/language arts, math, science, and social studies to ensure a progressive program	Ongoing School Year 2025-2026
4. School will review the curriculum maps created from the curriculum mapping project led by the ADD-BOS curriculum specialist.	September 2025
5. Curriculum maps will be posted on the school SharePoint site and utilized in instructional planning.	October 2025

Legal Citation: §36.23(b)(1-4):

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

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

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES Junior High instructional program will include Math, Social Studies, and Science as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Curriculum Implementation: HES has adopted the SAVVAS curriculum for English Language Arts (ELA), Mathematics, Social Studies, and Science for the 2024-2025 school year. These subjects are part of the master schedule; however, issues exist regarding Inconsistency in the completion of lesson plans, which are not adequately documented or reviewed. Submitted lesson plans primarily consist of printed material from online resources, offering unclear insights on the timing and delivery of lessons. Insufficient Evidence of Compliance: The inadequacy of lesson plans means there is insufficient evidence to confirm that the curriculum is being effectively followed across required content areas.
BIE Staff Responsible	Junior High teachers, Principal, ADD-BOS curriculum and instruction specialist, Facilitator
Resources	Native Knowledge 360, Smithsonian's National Museum of the American Indian https://americanindian.si.edu/nk360/lessons-resources/search-resources The site has a search feature for locating cross-disciplinary lesson plans at different grade levels, including Math, Social Studies, and Science.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025
4. Support and training will be provided through PLCs and Savvas (Curriculum) professional development.	Ongoing SY 2024-2025

Legal Citation: §36.23(b)(5):

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

(5) Fine arts and practical arts. One unit each shall be required of each student in the junior high/middle school instructional program.

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will have an instructional program that includes Fine Arts and Practical Arts as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:

Possible funding source- Title IV-A well-rounded schools

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Absence of Fine Arts and Practical Arts Instruction: HES does not currently offer fine arts or practical arts as part of its instructional program. Although some staff may be incorporating elements of fine arts and practical arts into lessons, there are no formal lesson plans available to demonstrate compliance with the regulatory requirement. Importance of Arts Education: Fine and practical arts are essential for addressing the holistic needs of students and fostering creativity and engagement, making their absence a significant gap in the educational offerings.
BIE Staff Responsible	Junior High teachers, Principal, ADD-BOS curriculum and instruction specialist, Facilitator
Resources	These institutions are sources for Native fine arts and practical arts teachers. Institute of American Indian Arts , Northern Arizona University Institute of Native Serving Educators , University of Arizona Indigenous Teacher Education Program

Action Steps	Timeline
1. School will acquire a curriculum, supplies, and resources for Fine Arts and Practical Arts	May 2025
2. Fine Arts and Practical Arts will be added to the master schedule to be taught once per week.	August 2025
3. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
4. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	August 2025
5. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	Ongoing SY 2025-2026
6. Work with the facilitator to partner with the tribe and community to find resources/people to teach cultural arts.	Ongoing SY 2025-2026

Legal Citation: §36.23(b)(6):

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

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

Monitoring (who, when, how):

- Compliance Specialist will review the school's lesson plan template to ensure this requirement is included.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will integrate computer literacy into the curriculum as evidenced by lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

A potential funding expense may be for computers for each classroom.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Insufficient Integration of Computer Literacy: While computer literacy is integrated into various programs such as i-Ready, Savvas curriculum activities, typing.com, and other teacher-initiated programs, the implementation and monitoring of computer literacy education lacks clarity. Lack of Documentation: There are no lesson plans documenting how teachers are developing and integrating computer literacy into their lessons, making it difficult to ascertain whether students are receiving the required instruction.
BIE Staff Responsible	Junior High teachers, Principal, ADD-BOS curriculum and instruction specialist,
Resources	Everything You Need to Teach Digital Citizenship https://www.commonsense.org/education/digital-citizenship This K-12 Digital Citizenship Curriculum provides lesson plans by grade level to address timely topics and prepare students to take ownership of their digital lives. Teacher Digital Learning Guide: TEACHING DIGITAL CITIZENSHIP & SAFETY https://tech.ed.gov/publications/digital-learning-guide/teacher/#1b This guide is designed to provide important resources and recommendations to support teacher implementation of digital learning.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: §36.23(b)(7)
 The curriculum shall include the following required instructional content areas at each grade level but need not be limited to:

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

- Monitoring (who, when, how):**
- Compliance specialist will review lesson plans to ensure they include this regulation.
 - Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:
 HES will have an instructional program that includes Physical Education as evidenced by the master schedule and lesson plans.

Funding /Expenditures necessary:
 A potential funding expense may be for computers for each classroom.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Physical Education Services: HES had a contracted Physical Education (PE) teacher who provided services from the beginning of the school year until December 2024. However, after her resignation, no PE services have been provided to students, resulting in a gap in required instruction. Insufficient Documentation: There are no available lesson plans documenting any PE instruction for the first half of the school year, which complicates compliance verification with the physical education requirements.
BIE Staff Responsible	Principal, PE teacher, ADD-BOS Curriculum and instruction Specialist
Resources	

Action Steps	Timeline
1. Principal will teach PE until the federal hiring freeze ends and a PE teacher can be hired.	February 2025
2. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
3. Lesson Plans will be reviewed weekly by administration and BIE staff for quality and expectation adherence.	April 2025
4. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

Legal Citation: §36.23(c)(1-4):

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

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

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

HES will integrate career exploration and orientation, environmental and safety education, metric education, and consumer economics into the school's curriculum and instructional program as evidenced through curriculum maps and lesson plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Integration of Content Areas: While the Savvas curriculum is designed to effectively integrate various content areas, including career exploration, environmental and safety education, metric education, and consumer economics, there is a significant lack of consistent lesson plans that document when and how these topics are taught in the classroom. Insufficient Evidence of Compliance: The absence of detailed and customized lesson plans means there is inadequate evidence to demonstrate compliance with the requirements for integrating these essential content areas.
BIE Staff Responsible	Principal, Junior high teachers, School counselor, ADD-BOS curriculum and instruction specialist
Resources	Khan Academy https://www.khanacademy.org/ Khan Academy offers free online courses and resources that use personalized learning techniques, along with tools designed to support teachers in delivering tailored instruction. There is content on career exploration and orientation, safety and metric education, and consumer economics. NEEF K-12 Environmental Education https://www.neefusa.org/what-we-do/k-12-education NEEF provides a range of K-12 resources designed to support educators in integrating environmental topics into their curriculum, with the aim to foster environmental literacy and inspire students to engage with environmental issues. PBS Learning Media For Teachers

	https://thinktv.pbslearningmedia.org/ This platform provides a collection of PK-12 educational resources, including videos, lesson plans, and interactive activities aligned with curriculum standards.
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Action Steps	Timeline
1. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
2. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
3. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025
6. Work with the facilitator to collaborate with the community and tribe on career exploration.	Ongoing SY 2024-2025

Legal Citation: §36.23(c)(5):

- (c) The following content areas shall be integrated into the curriculum.
- (5) Health education (includes meeting the requirements contained in 24 Stat. 69).

Monitoring (who, when, how):

- Compliance specialist will review lesson plans to ensure they include this regulation.
- Compliance specialist will conduct walkthroughs to observe classroom instruction during site visits.

Success Criteria:

The HES junior high instructional program will include health education as evidenced through lesson plans, curriculum maps, and classroom walkthroughs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Documentation for Health Education: While Physical Education (PE) was taught during the first half of the school year and included health education, there are insufficient lesson plans available to demonstrate compliance with health education requirements. The absence of adequate documentation makes it challenging to verify whether all required components of health education were adequately implemented.
BIE Staff Responsible	PE teacher, HES principal, BOS behavior health coordinator
Resources	<u>KidsHealth in the Classroom</u> KidsHealth in the Classroom offers educators free health-related lesson plans. Each Teacher's Guide includes discussion questions, classroom activities and extensions, printable handouts, quizzes, and answer keys all aligned to National Health Education Standards. Arizona Health Education Standards and Resources <u>https://www.azed.gov/pe/health-education</u>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Health Education will be provided in conjunction with Physical Education.	February 2025
2. A lesson plan template will be developed to document the implementation of the curriculum and the integration of regulatory requirements.	April 2025
3. Lesson Plans will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
4. Administrators and BIE staff will develop a walkthrough form and will conduct walkthroughs to ensure adherence to instructional expectations.	April 2025

25 CFR §36.30, Standard X - Grading Requirements

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.

- Monitoring (who, when, how):**
- Compliance specialist will review the handbook grading policy to ensure it meets the requirements of this regulation upon completion of any revisions.
 - Compliance specialist will review the lesson plan template and lesson plans during site visits to ensure prescribed objectives are being taught.

Success Criteria:
HES will implement a uniform grading policy that assesses mastery of prescribed objectives as evidenced through written policy in the student handbook, lesson plans, scope and sequence, and grades in NASIS.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Grading Policy: HES has a grade level promotion policy stating that “a student advances to the next level based on measurable mastery of instructional objectives for the current grade,” as outlined in the Student Handbook. However, there is no grading policy present in either the teacher or student handbook, leaving it unclear whether grades are based on mastery of prescribed objectives. Currently, common assessments are not used, and assessments are not reviewed by the administration or during Professional Learning Communities (PLCs).
BIE Staff Responsible	Principal, teachers, ADD-BOS curriculum, and Instruction Specialist.
Resources	Flagstaff Unified School District Standards Based Education Elementary Teacher Handbook The first 15 pages of this handbook outlines grading practices for standards-based education, including components on instruction, learning, evaluation, and reporting.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Revise the current student and teacher handbook to include a uniform grading policy.	August 2025
2. A lesson plan template will be developed to document grade-level objectives.	April 2025
3. Complete the scope and sequence for the school-selected curriculum to identify prescribed objectives.	August 2025
4. Develop/access/utilize common assessments to measure mastery of prescribed lesson/unit objectives. Assessments will be submitted with weekly lesson plans.	Ongoing SY 2025-2026
5. Administrator and BIE staff will monitor NASIS to ensure the grading policy is followed.	Ongoing SY 2025-2026

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.

Monitoring (who, when, how):

- Compliance Specialist will review the teacher handbook to ensure the policy meets the requirements of this regulation once it is complete.
- Compliance specialist will review classroom files during site visits.
- Compliance specialist will monitor professional development by reviewing sign-in sheets, agendas, and PD calendars.

Success Criteria:

HES will use information derived from instructional evaluations to make data-based decisions when planning instructional activities as evidenced through data binders, lesson reflection, and lesson plans. Evaluation information will be shared with parents and students as evidenced through conferences and progress reports.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Established System for Sharing Assessment Data: HES hosted parent-teacher conferences from October 28-31, 2024, to share grades and information with parents. However, there is no established system or expectation indicating that teachers are formally using assessment data to adjust learning activities. While some teachers may implement this practice, it is not consistently monitored or documented through lesson plans. Additionally, parents currently do not have access to the parent portal in NASIS, which limits their ability to track their children's academic progress.
BIE Staff Responsible	Principal, Teachers, ADD-BOS curriculum and instruction specialist
Resources	3 Steps to Developing an Asset-Based Approach to Teaching https://www.edutopia.org/article/3-steps-developing-asset-based-approach-teaching/ This resource provides practical steps to guide educators in using an asset-based approach to teaching and evaluating by focusing on students' strengths.

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Parents will be provided with NASIS access to track their student's academic progress.	March 2025
2. All staff will maintain a contact log to document attempts to share student data.	March 2025
3. A lesson plan template will be developed to document the use of data in learning activities	April 2025
4. Lesson plans and assessments will be reviewed weekly by the administration and BIE staff for quality and expectation adherence.	April 2025
5. Teacher training on formative and summative assessment and using data to drive instruction.	May 2025
6. Parent-teacher conferences will be held in the Fall and the spring	School year 2025-2026

Legal Citation: §36.30(d) (1-3)

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

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

Monitoring (who, when, how):

- Compliance Specialist will review the report card policy in the student and teacher handbook to ensure it meets the requirements of this regulation once revisions are made.
- Compliance Specialist will review student records during site visits to ensure report cards meet the requirements of this regulation.

Success Criteria:

HES will issue report cards four times a year that contain key information identified in this regulation. Report cards with signatures or requests for signatures will be kept in students' cumulative records.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Incomplete Report Card Information: HES does issue report cards, but they do not contain all the required information as specified in the regulation. Currently, there are no signatures present on the report cards. Additionally, the probable promotion status will only appear on the final report card at the end of the school year.
BIE Staff Responsible	HES principal, teachers, secretary
Resources	

Action Steps	Timeline
1. A school communication log will be established to document all dates that documents are sent home and other school-to-home communications.	March 2025
2. End-of-year report cards will be reviewed and modified to include the requirements of this regulation.	Ongoing SY 2024-2025
3. Teachers will review report cards and request parent/guardian signatures during parent-teacher conferences.	During scheduled PT conferences
4. Report cards will be sent home with students with a request for students to return report cards with signatures to add to students' school cumulative records when the parent does not attend parent- teacher conferences or when parent- teacher conferences are not held.	Ongoing quarterly SY 2024-2025

25 CFR §36.31, Standard XI - Student Promotion Requirements

Legal Citation: 25 CFR § 36.31 (a-c):

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.

- (a) Each grade level or equivalent shall have a minimum criterion 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.

Monitoring (who, when, how):

- Compliance specialist will review the promotion policy to ensure it meets the requirements of this regulation upon completion of review and edits.
- Compliance Specialist will review the approval documentation from the School Board and Education Program Administrator.

Success Criteria:
HES will establish a promotion policy that meets the requirements of this regulation as evidenced through teacher and student handbooks and have documents approved by the school board and education program administrator.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	<p>Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:</p> <p>Approval and Compliance Issues: There is a promotion policy included in the handbook that has been approved by the school board; however, there is currently no documentation indicating that the Education Program Administrator approved the policy as well.</p> <p>Implementation Issues with Promotion Criteria: While measurable mastery of instructional objectives is included in the approved grade-level promotion policy, it is not being fully implemented. The instructional program and assessments do not effectively measure grade-level instructional objectives, leading to discrepancies in how student mastery is evaluated.</p> <p>Absence of Evaluation Criteria in Promotion Policy: The requirement for criterion-referenced tests to evaluate student skills is not included in the school's promotion policy. While HES has reviewed and revised its handbook and policies, this specific sub-regulation was overlooked during the update process.</p>
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	Implementation Issues with Attendance Requirements: Although this requirement is included in the approved Grade Level Promotion Policy, it has not been fully implemented. All students who do not meet the minimum attendance requirements should have documented meetings with the school board or a committee to review their promotion decisions.
BIE Staff Responsible	Principal, Education Program Administrator
Resources	Sample Student Promotion Policy: Alachua County Public Schools, Florida This section on Student Promotion and Retention (p. 3-9) provides a comprehensive example of what a promotion policy may look like with minimum criteria on instruction objectives and tests.

Action Steps	Timeline
1. Revise the promotion policy in the teacher/student handbooks to ensure it meets the requirements of this regulation to include subpart (b) as part of the promotion requirement.	July 2025
2. Submit to the school board and Education Program Administrator for approval once revised.	August 2025
3. The administrator and BIE staff will collect and review assessments to ensure they align with grade-level objectives and accurately reflect student mastery.	School year 2025-2026
4. A process and committee will be established to review promotion decisions for students who do not meet attendance requirements.	May 2025

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

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.

Monitoring (who, when, how):

- Compliance Specialist will review the master schedule to ensure library services are scheduled for all students upon completion.
- Compliance Specialist will conduct walkthroughs during site visits to observe whether library services are occurring according to the master schedule.
- Compliance specialist will review the BIE One plan once complete in the Plan4learning portal.
- Compliance specialist will review documentation from the school board meetings to ensure the philosophy has been reviewed in conjunction with the school board.
- Compliance Specialist will review data from the questionnaires and the written set of instructional and service objectives.

Success Criteria:

HES will provide a library/media program that meets all requirements as evidenced by a hired/contracted librarian on staff, library time in the master schedule, and documented walkthroughs.

HES will offer a library/media program with a written set of instructional and service objectives that is consistent with the school's need and philosophy as evidenced by the BIE One Plan, data from questionnaires, and documented objectives that drive the program.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Library Services and Defined Philosophy: HES does not currently have a librarian. A contracted librarian who visited the school weekly resigned at the beginning of the school year. Additionally, HES does not have a defined school philosophy, although SMART educational goals have been set through the BIE One Plan.
BIE Staff Responsible	Principal, Librarian
Resources	American Indian Library Association School Library Resources https://ailanet.org/school-library-resources/

	<p>This collection from the American Indian Library Association includes book lists, reading programs, library lesson plans, and more resources.</p> <p>American Association of School Librarians’ National School Library Standards</p> <p>https://standards.aasl.org/administrators/</p>
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Action Steps	Timeline
1. A team, including stakeholders, will be established to develop a school philosophy that reflects the needs of the students and community using data from the comprehensive needs assessment.	July 2025
2. Instructional and service objectives for the library will be established when reviewing SMART goals with school staff and documented.	August 2025

Legal Citation: §36.40(a)(2)(i-v)

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

- (i) A collection of books suitable for the range of student abilities and interests being served in the following ADM ratios.
 - (A) Elementary K-6, 15 books per student
 - (B) Middle 7-8, 12 books per student
 - (C) Secondary 9-12, 10 books per studentIt 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.

Monitoring (who, when, how):

- Compliance specialist will review all documentation and meeting sign-in sheets for the library committee during site visits.
- Compliance specialist will review the approved written policy uploaded on the School's OneDrive account.

Success Criteria:

HES will have an established library committee with a school board-approved written policy for the selection of materials as evidenced through meeting agendas and sign-in sheets, and approved policy loaded to the school's OneDrive.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Written Policy and Inventory: HES currently lacks a written policy for the selection of materials and equipment. While the school has a large collection of books suitable for a variety of student abilities and interests, this collection has not been inventoried, leaving it unclear whether it meets the criteria for compliance with relevant regulations. Furthermore, textbooks are
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	<p>not part of the library collection, and there is insufficient documentation regarding the inclusion of materials relevant to Indian Tribes and/or Alaskan Natives.</p> <p>Additionally, the school does not subscribe to periodicals for students, and although there are some audio-visual materials on campus, these resources are also not inventoried or tracked due to the absence of a librarian. Consequently, the library's ability to effectively support student learning and comply with regulatory standards is compromised.</p>
BIE Staff Responsible	Principal, Librarian, teachers, Facilitator
Resources	<p>American Library Association School Library Selection Criteria https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria A Selection & Reconsideration Policy Toolkit for Public, School, & Academic Libraries, including the importance of selection policies, basic components of selection policies, and guidelines.</p> <p>American Indian Library Association School Library Resources https://ailanet.org/school-library-resources/ This collection from the American Indian Library Association includes booklists, reading programs, library lesson plans, and more resources.</p>

Action Steps	Timeline
1. Establish a library committee composed of a librarian (Once appointed), teacher representative, administrator, parent, student, and school board member.	May 2025
2. Committee will develop a written policy for the selection of materials and equipment that meet the regulations in this regulation.	May 2025
3. Send the policy to the school board for approval.	May 2025
4. With the help of the facilitator, research and seek materials about the Havasupai tribe.	Ongoing SY 2024-2025

Legal Citation: §36.40(a)(3)

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

School Enrollment (ADM)

Up to 100 - 1/5 time librarian

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

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

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

Monitoring (who, when, how):

- Compliance Specialist will monitor library services through site visits, the master schedule, and financial calls with contract reviews.

Success Criteria:

HES will provide library services by a certified librarian a minimum of 1 day a week as evidenced by the master schedule, library service plan, and current school contracts.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Absence of Librarian Services: The school does not currently have a librarian to service the library media center. Although the current school enrollment is less than 100 students, which would typically require at least a part-time librarian, the absence of a librarian limits the functionality and effectiveness of the library media center.
BIE Staff Responsible	Principal
Resources	Design Tips for an Elementary Media Center https://miencompany.com/5-design-tips-for-an-elementary-media-center/ This blog lists some considerations for an effective school library media center. American Indian Library Association School Library Resources https://ailanet.org/school-library-resources/ This collection from the American Indian Library Association includes booklists, reading programs, library lesson plans, and more resources.

Action Steps	Timeline
1. The school will hire or contract a librarian to service the school a minimum of once per week once the federal hiring freeze is lifted.	TBD

Legal Citation: §36.40(a)(4)

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

Monitoring (who, when, how):

- Compliance specialist will check inventories upon completion.
- Compliance specialist will participate in financial review calls to monitor purchasing.

Success Criteria:

HES will conduct an annual inventory using a system and keep all inventory records in school files.

Funding /Expenditures necessary:

A potential funding expense may be for the purchase of Follett Destiny for the school library as an automated check-in/check-out and inventory system.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Annual Inventory: HES has not conducted an annual inventory of available books, materials, and equipment, which is essential for ensuring compliance with acquisition and selection policies.
BIE Staff Responsible	Librarian, principal, and business technician
Resources	American Library Association School Library Selection Criteria https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/criteria A Selection & Reconsideration Policy Toolkit for Public, School, & Academic Libraries, including the importance of selection policies, basic components of selection policies, and guidelines. How to Inventory the School Library Collection https://lookingbackward.edublogs.org/2020/07/15/inventory/ School librarian describes the inventory process she follows step-by-step.

Action Steps	Timeline
1. Librarian will begin the process of conducting a manual inventory of all equipment, materials, and books	SY 2025-2026

25 CFR §36.41, Standard XIV - Textbooks

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.

Monitoring (who, when, how):

- Compliance Specialist will review the approved list for the textbook review committee and any documents related to the selection on the schools' SharePoint site or during site visits.

Success Criteria:

HES will have an established and approved textbook review committee composed of teachers, parents, students, and school board members as evidenced through meeting sign-ins and agendas.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Textbook Review Committee: HES has not established a textbook review committee composed of teachers, parents, students, and school board members, which is necessary for compliance with the required standards.
BIE Staff Responsible	Principal, teachers, and the Facilitator.
Resources	<p>Greenwich Public Schools Textbook Review Committee https://www.greenwickschools.org/teaching-learning/textbook-review-committee Information about Greenwich Public School's textbook review committee—its purpose, objectives, and process.</p> <p>Guide for Selecting Anti-Bias and Anti-Racist Classroom Texts https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf Guide which presents considerations and questions to ask when determining if a text is inclusive.</p> <p>American Library Association Selection & Reconsideration Policy Toolkit for Public, School, & Academic Libraries https://www.ala.org/tools/challengesupport/selectionpolicytoolkit/committees Offers guidelines for materials reconsideration committees.</p>

Action Steps and Timeline on the next page.

Action Steps	Timeline
1. Collaborate with the ADD-BOS curriculum and instruction education specialist to utilize resources from the West Ed curriculum team to develop guidelines and a framework for the textbook review committee.	June 2025
2. Present Textbook review committee details to the staff during staff orientation.	August 2025
3. Work with the facilitator to enlist parents to be a part of the textbook review committee	August 2025
4. Submit the committee to the school board for approval	September 2025

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.

Monitoring (who, when, how):

- Compliance Specialist will review the meeting and consultation documentation during site visits or on the school SharePoint site.
- The compliance specialist will review the procedure and criteria for the annual review of textbooks on the school SharePoint site to ensure they meet the requirements of this regulation.

Success Criteria:

HES will have a textbook review committee with an established procedure and criteria for the annual review of textbooks as evidenced by a written procedure and rubrics that are used in their annual review.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Absence of a Textbook Review Committee: HES has not established a textbook review committee for the annual review of textbooks and other materials used to complement instruction. This sub-regulation is contingent upon the establishment of a textbook review committee, which has yet to be formed.
BIE Staff Responsible	Principal, teachers, and Facilitator
Resources	Greenwich Public Schools Textbook Review Committee https://www.greenwickschools.org/teaching-learning/textbook-review-committee Information about Greenwich Public School’s textbook review committee—its purpose, objectives, and process. Guide for Selecting Anti-Bias and Anti-Racist Classroom Texts https://mn.sourcewell.org/sites/mnsourcewellorg/files/2022-03/2020_HO_Guide_to_ABAR_Book_Selection_0421.pdf Guide which presents considerations and questions to ask when determining if a text is inclusive.

Action Steps	Timeline
1. Collaborate with the ADD-BOS curriculum and instruction education specialist to utilize resources from the West Ed curriculum team to develop guidelines and a framework for the textbook review committee.	June 2025
2. Facilitator will assist with the review to ensure the textbooks meet the needs of the Havasupai tribal community.	TBD

25 CFR §36.42, Standard XV - Counseling Services

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.

Monitoring (who, when, how):

Compliance specialist will review the documentation of counseling services and the school testing plans during site visits.

Success Criteria:

HES will offer a counseling program that offers services concerned with physical, social, emotional, intellectual, and vocational growth for each student as evidenced through counseling logs. The HES counseling program will be included in the school-wide assessment program as evidenced through training logs and the school testing plan.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Interruption of Counseling Services: For most of the 2024-2025 school year, the school counselor was assigned to teach in a 3rd/4th-grade classroom. After resigning on December 11, 2024, a new counselor was appointed and started on December 17, 2024. During the period when the school counselor was assigned to teaching duties, no counseling services were provided, which significantly impacted the emotional and social support available to students. Uncertainty in Comprehensive Support: Although the new counselor is now teaching Social-Emotional Learning (SEL) classes, it remains unclear whether the new school counselor is adequately addressing all areas of student support, including physical, social, emotional, intellectual, and vocational growth as required by the regulation. This uncertainty necessitates further evaluation of the services being provided.
BIE Staff Responsible	Principal, counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	

Action Steps	Timeline
1. School counselor will develop a schedule and documented procedures for meeting all student needs stated in this regulation.	May 2025
2. School will track services through service logs and lesson plans.	Ongoing SY 2025-2026

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

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

- Monitoring (who, when, how):**
- Compliance specialist will review the counselor’s schedule, lesson plans, logs, and other documentation that counseling services are being provided to students.

Success Criteria:
HES will have a part-time professional counselor as evidenced by the counselor’s schedule, lesson plans, service logs, and other documentation.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Interruption of Counseling Services: For most of the 2024-2025 school year, the school counselor was assigned to teach in a 3rd/4th grade classroom. After resigning on December 11, 2024, a new counselor was appointed and started on December 17, 2024. During the period when the school counselor was assigned to teaching duties, no counseling services were provided, impacting the emotional and social support available for students.
BIE Staff Responsible	Princip, counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	

Action Steps	Timeline
1. HES will develop a staffing contingency plan for long-term absences to ensure that counseling services are not disrupted in the future.	August 2025

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

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

Monitoring (who, when, how):

- Compliance Specialist will review onboarding and training materials for the school counselor.
- Compliance specialist will review documentation that the counselor received training and resources on the unique tribal, social, and economic characteristics of the students.

Success Criteria:

HES will provide onboarding training materials and resources to all counselors as evidenced by training materials and documentation that training was received.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Formal Integration in the Counseling Program: Since the initial assessment, HES has had three school counselors working with the students. In conversations with each counselor, some expressed that they had read books about the community and took the initiative to learn more about the unique tribal, social, and economic characteristics of the students. However, this initiative is not formally integrated into the HES counseling program, and there are no materials or information readily provided to support the counselors in understanding these essential aspects of the student population.
BIE Staff Responsible	Counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	The following books could be used as resources: Hirst, Steven. <i>I Am the Grand Canyon</i> . 2006. Iliff, Flora Gregg. <i>People of the Blue Water</i> . 1985. Tikalsky, Frank, and Catherine A. Euler. <i>The Sacred Oral Tradition of the Havasupai: As Retold by Elders and Headmen Manakaja and Sinyella, 1918-1921</i> . 2011. Duran, Eduardo. <i>Healing the Soul Wound</i> . 2019. Linklater, Renee. <i>Decolonizing Trauma Work: Indigenous Stories and Strategies</i> . 2014.

Action Steps	Timeline
1. The counselor will collaborate with the ADD BOS Student Behavioral Health Program Specialist and review resources to develop an onboarding document to familiarize new counselors with students' unique tribal, social, and economic characteristics.	August 2025
2. Collaborate with the facilitator to find resources in the tribe and community.	TBD

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

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

Monitoring (who, when, how):

- Compliance specialist will review procedural documents for the counseling programs.

Success Criteria:

HES will have a counseling program with techniques and documentation procedures to provide for the career, academic, social, and personal needs of students based on cultural beliefs and values as evidenced by procedural documents, logs, and plans.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Counseling Documentation Procedures: HES currently lacks program policies or procedures for documentation related to counseling, including counseling plans, forms, logs, or progress reports. Although HES utilizes the Character Counts curriculum in its Social-Emotional Learning (SEL) classes, this curriculum does not align with the cultural beliefs and values of the students being served.
BIE Staff Responsible	Counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	

Action Steps	Timeline
1. Collaborate with the ADD-BOS Behavioral Health Specialist to develop documentation procedures such as counseling plans, progress reports, and logs.	May 2025
2. Work with the facilitator to engage community members to ensure the SEL program reflects cultural beliefs and values.	TBD

Legal Citation: §36.42(b)(3)(iii)

(3) The counseling program shall contain the following:

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

Monitoring (who, when, how):

- Compliance Specialist will review counseling plans and logs along with lesson plans for SEL classes.
- Compliance specialist will ensure regulations are being met through walkthroughs during site visits.

Success Criteria:

HES will have a counseling program that contains preventative and crisis counseling on both individual and group bases as evidenced through schedules, plans, and logs.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:			
Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Insufficient Counseling Services: Currently, the counselor offers Social-Emotional Learning (SEL) classes and has limited time (35 minutes twice a week) for individual counseling. The program has been in place for less than two months and will be reassessed to examine scheduling and counseling logs to gauge its effectiveness. However, the current structure does not adequately provide for preventative and crisis counseling on both individual and group bases.		
BIE Staff Responsible	School counselor, ADD BOS behavior Health specialist		
Resources			
Action Steps		Timeline	
1. Revise the school counselor schedule to give sufficient time to individual and group counseling sessions.		April 2025	

Legal Citation §36.42(b)(3)(iv) - The counseling program shall contain the following: (iv) Confidentiality and security of counseling records for each student; and

Monitoring (who, when, how):

- Compliance specialist will review security procedures for handling and storing counseling records. During site visits, the compliance specialist will view the counselor’s workspace to ensure security measures are being followed.

Success Criteria:

HES will have a counseling program that contains confidentiality and security of counseling records for each student as evidenced by a secure workspace with a locking file cabinet and locking doors and documented security procedures.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Secure Storage for Counseling Records: The counseling program currently lacks a locking file cabinet, which is essential for maintaining the confidentiality and security of student counseling records. This absence poses a significant risk to the protection of sensitive information.
BIE Staff Responsible	Principal, counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	

Action Steps	Timeline
1. Acquire a locking file cabinet and secure workspace for the school counselor.	March 2025
2. Collaborate with the ADD-BOS Student Behavioral Health Program Specialist to develop security procedures for counseling records.	May 2025

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

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

Monitoring (who, when, how):

- Compliance specialist will review plans, trackers, and sign-in sheets for the orientation program to facilitate transition from middle school to high school on SharePoint and during site visits.

Success Criteria:

HEs will design and implement an orientation program to facilitate the students' transition from middle school to high school as evidenced by a written plan, trackers, and sign-in sheets to demonstrate collaboration.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Orientation Programs: HES has not designed and implemented orientation programs to facilitate the transition from elementary to junior high/middle school and from junior high/middle school to high school.
BIE Staff Responsible	Principal, counselor, ADD-BOS Student Behavioral Health Program Specialist
Resources	

Action Steps	Timeline
1. Establish connections with all BOS Off-Reservation Boarding schools to collaborate in creating a plan to support student transition.	April 2025
2. Create a spreadsheet to monitor student progress in attending high school.	April 2025
3. Host an informational meeting for parents/guardians and students to provide resources and support families in preparing for the transition to high school.	May 2025

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

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

- Monitoring (who, when, how):**
- Compliance specialist will review counseling logs/documentation of academic counseling and academic and career plans during site visits.

Success Criteria:
HES middle school students are receiving academic counseling twice per year, as evidenced by counseling logs and written academic and career plans.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons: Lack of Academic Counseling: HES has not had a counseling program for most of the 2024-2025 school year, primarily due to the counselor being assigned as a classroom teacher. As a result, 7th and 8th-grade students have not received academic counseling to develop written academic and career plans based on their abilities, aptitudes, and interests.
BIE Staff Responsible	Principal and counselor
Resources	

Action Steps	Timeline
1. Schedule academic counseling for all middle school students to develop academic and career plans.	March 2025

25 CFR §36.43, Standard XVI - Student Activities

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.

(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.

(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.

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

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

- Monitoring (who, when, how):**
- Compliance Specialist will review all documents, data from questionnaires, and sign-in sheets on the school’s SharePoint site.
 - During site visits, the compliance specialist will conduct a walkthrough of activities and review documentation on file at the school.

Success Criteria:
HES will provide and maintain a well-balanced student activities program based on an assessment of both student and program needs as evidenced through questionnaires, approved activity plans, and orientation documentation.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	<p>Havasupai Elementary School is currently rated as non-compliant with this regulation for the following reasons:</p> <p>Lack of Comprehensive Activity Plan: Currently, the only extracurricular activity at HES is the Native Language and Culture Club, which does have a qualified sponsor approved by the school supervisor. However, HES is rated as non-compliant with this regulation because, despite the school board approving the stipend list, there is no comprehensive activity plan that meets the required elements outlined in part (b), such as purpose, structure, coordination, and planned types of fundraising activities.</p> <p>Lack of Submitted Activity Plans: The HES staff handbook provides guidance regarding the opportunity to sponsor extracurricular activities; however, there are no further expectations or requirements communicated for potential activity sponsors. HES is rated as non-compliant due to the lack of submitted plans for student activity operations, which are necessary for effectively organizing and managing school activities.</p> <p>Absence of Documented Activity Procedures and Guidelines: HES is rated as non-compliant due to the lack of documented activity procedures and guidelines for school-sponsored activities. While the school handbook includes general guidelines for activity approval and stipend information, it does not</p>
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	provide specific expectations, protocols, or safety measures for sponsors, nor does it ensure the safety and welfare of students involved in such activities. Lack of Orientation and Training for Activity Sponsors: HES is rated as non-compliant because the school has not provided orientation and training regarding the responsibilities of activity sponsors by the school supervisor. Additionally, the school lacks documented procedures and guidelines for school-sponsored activities.
BIE Staff Responsible	Principal, teachers, and Facilitator
Resources	These resources from Illinois describe ways to start an afterschool program. https://actnowillinois.org/professional-development-resources/starting-an-afterschool-program/

Action Steps	Timeline
1. Develop a standardized template for student activity operation plans, including purpose, structure, coordination, and planned fundraising activities.	April 2025
2. Revise the staff handbook to include expectations and guidelines for potential sponsors of activities	April 2025
3. Create and administer a questionnaire to gather student data in interests and preferences for extracurricular activities.	April 2025
4. With the assistance of the Facilitator, identify community and tribal resources for cultural activities.	TBD
5. Submit the operation plans for approval to the school board.	May 2025
6. Principal will give Orientation and training for all staff who will be activity sponsors with a sign-in acknowledging responsibilities.	August 2025

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

Legal Citation: §36.51(a)

(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 visits, 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.

- Monitoring (who, when, how):**
- Compliance officer will work as a part of the CPO to schedule, plan, and facilitate onsite monitoring for the school year 2025-2026.
 - Compliance Specialist will work with the CPO to review reports and ensure they are delivered to the school within 30 days of the monitoring.

Success Criteria:
The Bureau of Indian Education, through the Chief Performance Office, will conduct onsite monitoring of Havasupai Elementary School every 3 years to monitor and evaluate the requirements of this part.

Funding /Expenditures necessary:
No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	This regulation is rated as non-compliant because the Director’s Office has not fully monitored and evaluated the conformance of the Education Resource Center (ERC) and its schools with the requirements set forth under 25 C.F.R. Part 36. Although the BIE Director’s Office conducts various forms of monitoring and evaluations, including ISEP reviews and programmatic and fiscal monitoring, HES has not been adequately monitored and evaluated against the outlined requirements.
BIE Staff Responsible	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
Resources	

Action Steps	Timeline
1. Chief Performance Office for BIE will facilitate Onsite monitoring for Havasupai Elementary School and continue monitoring every three years.	School Year 2025-2026
2. School and Education Resource Center will receive a final report and technical assistance plan 30 days after the completion of the monitoring visit.	School Year 2025-2026

Legal Citation: §36.51(b)

(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.

Monitoring (who, when, how):

- Compliance officer will work as a part of the CPO to schedule, plan, and facilitate onsite monitoring for school year 2025-2026.
- Compliance Specialist will work with the CPO to review reports and ensure they are delivered to the school within 30 days of the monitoring.

Success Criteria:

The Bureau of Indian Education, through the Chief Performance Office, will conduct onsite monitoring, in conjunction with its school board and the area education programs administrator of Havasupai Elementary School every 3 years to monitor and evaluate the requirements of this part.

Funding /Expenditures necessary:

No additional funding or expenditures are necessary.

Progress:	
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Annual Report Finding	This regulation is rated as non-compliant because the Education Resource Center (ERC) does not conduct onsite evaluations of HES to assess conformance with the requirements of 25 C.F.R. Part 36 through the mandated annual onsite evaluation or at least once every three years. Although the ERC performs ISEP monitoring every Fall and Spring for funding requirements associated with 25 CFR Part 39, this review does not encompass programmatic evaluations required by the regulation.
BIE Staff Responsible	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
Resources	

Action Steps	Timeline
1. ADD-BOS office will be a part of the monitoring process facilitated by the CPO office.	School Year 2025-2026
2. School board will be invited to participate in the monitoring process through interviews and the exit meeting.	School Year 2025-2026
3. School will receive a written final report and technical assistance plan within 30 days of the completion of the monitoring.	School Year 2025-2026

Legal Citation: §36.51(e)

(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.

Monitoring (who, when, how):

- Compliance Specialist will work as a part of the team conducting the summative evaluation and collect data through meeting notes, attendance, rubric, and evaluation tools used.

Success Criteria:

BIE will conduct an annual summative evaluation in partnership with WestEd or another non-federal agency to assess the degree to which educational policies and procedures assist or hinder schools in complying with the requirements of this part and make changes based on findings as evidenced through a summative evaluation report.

Funding /Expenditures necessary:

A potential funding expense may be for a contract with a non-federal agency

Progress:	
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Annual Report Finding	The regulation is rated as non-compliant because the Associate Deputy Director - Office of Indian Services and the Education Resource Center have not conducted a summative evaluation to determine how BIE's educational policies and administrative procedures assist or hinder compliance with the requirements of Part 36. This finding encompasses all sections of the requirement (1-4).
BIE Staff Responsible	Chief Performance Office, Division of Performance and Accountability, School Operations, the ADD-BOS office.
Resources	

Action Steps	Timeline
1. BIE will work with WestEd or another non-federal agency to conduct a summative evaluation of current BIE policies and practices to determine effectiveness.	Ongoing 2025
2. BIE will work with West Ed or another non-federal agency to modify any policies or practices that interfere with or compromise the school's capability to achieve.	August 2025
3. BIE will submit a copy of the evaluation to the director.	September 2025

Summary of HES Annual Report

Summary of HES Annual Report

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

§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)- <u>Schools</u> , Agencies, and Areas shall permit access for examination purposes by the responsible official, or any duly authorized designee, to any <u>school</u> records and other sources of information which are related or pertinent to the requirements of this part.	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 policy and administrative procedure assists or hinders schools in complying with the requirements of this part.		X	