



CULTURE • KNOWLEDGE • LEADERSHIP • CULTURE • KNOWLEDGE • LEADERSHIP • CULTURE • KNOWLEDGE • LEADERSHIP

Havasupai Elementary School Work Plan

Updated December 2025

Background and Overview

In 2023, the Bureau of Indian Education (BIE) entered into a Settlement Agreement in the case of *Stephen C., et al. v. Bureau of Indian Education, et al.*, No. 3:17-cv-08004-SPL (D. Ariz.). This agreement addresses BIE's compliance with 13 specific regulations at Havasupai Elementary School (HES), as outlined in **25 C.F.R. Part 36**, which governs Minimum Academic Standards for the Basic Education of Indian Children and National Criteria for Dormitory Situations. The regulations covered include §§ 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 required by **Section B** of the Settlement Agreement, the BIE established a **Compliance Specialist** position to oversee the implementation of corrective actions at HES (Section B-1). Within three months of assuming the role, the Compliance Specialist completed an initial compliance assessment, finalized on **February 12, 2024**, and is publicly available at:

 <https://www.bie.edu/landing-page/havasupai-elementary-school>

Following the assessment, and in accordance with **Section B-2-b**, a written work plan was developed to outline how HES would achieve compliance with the 13 regulations. The initial plan was completed by **March 13, 2024**, and has been updated every 90 days to reflect progress and adjustments. Updates have been published on:

- April 12, 2024
- July 11, 2024
- October 9, 2024
- January 7, 2025
- April 11, 2025
- July 10, 2025
- October 8, 2025

Per **Section B-2-c**, the Compliance Specialist is also responsible for issuing an **annual report** on BIE's compliance status. The first report was **March 13, 2025**. Based on the findings of that report, a revised work plan was issued within 30 days and continues to be updated quarterly.

Havasupai Elementary School 90-Day Work Plan

Since the September 2025 update, the Havasupai Elementary School (HES) team has continued to operate with a shared sense of accountability and a collaborative approach to achieving compliance with the 13 applicable regulations. Bi-weekly coordination meetings between the Compliance Specialist and designated points of contact from the Education Resource Center (ERC) and Bureau Operated Schools (BOS) teams have supported consistent progress monitoring. Action steps are broken into manageable tasks and tracked using a centralized spreadsheet to promote transparency and accountability.

The full compliance team also meets bi-weekly to review progress, identify barriers, and adjust strategies as needed.

This December update reflects a streamlined and more functional format for the HES 90-Day Written Work Plan. The revised structure includes only the essential information needed to demonstrate compliance with 25 CFR Part 36. Each section now focuses on the applicable regulation, evidence required, corrective actions, and a status/progress update that reflects progress made during this reporting period.

The plan includes embedded links to citations and supporting reports. All compliance-related resources are maintained on a centralized Padlet, which is linked in this document and available on the school's SharePoint site for staff access.

At this time, there are no additional expenditures outside of the current budget required to achieve compliance. Any future costs necessary for compliance will be clearly identified in the introduction of subsequent updates.

In previous versions of the work plan, estimated timelines were included to guide implementation. However, these timelines often proved to be imprecise due to the dynamic nature of school operations, staffing availability, and the need for collaboration. Many of the activities are ongoing and iterative in nature. Therefore, timelines have been removed in favor of a continuous improvement model, with progress/status updates provided every 90 days. This approach allows for more accurate reporting and greater flexibility in responding to evolving needs.

Notable areas of progress in this report include:

- **Instructional Improvements:**
Teachers are submitting weekly lesson plans using the standardized template, which includes documentation of instruction in core and integrated areas. Station teaching is being used in multi-grade classrooms to ensure students access grade-level standards. Teachers have also administered learning style assessments and are using the data to differentiate instruction.
- **Policy Development:**
A promotion and grading policy has been adopted. The library handbook, counseling handbook, class coverage protocol, and student activity plan are all in final stages of development and will be submitted to the school board for approval.
- **Monitoring and Evaluation:**
A programmatic and fiscal monitoring visit by BIE is scheduled for January 2026. The school is preparing for this visit and will respond to any findings with a corrective action plan.
- **Professional Development and Walkthroughs:**
Weekly data meetings and PLCs are held on Wednesdays. Instructional walkthroughs are conducted using a student-centered observation tool, with monthly focus areas discussed during PLCs. A teacher-centered walkthrough tool is under consideration for future implementation.
- **Family Engagement:**
Parent-teacher conferences were held in November, with the next round scheduled for March 20, 2026. Outreach includes flyers, newsletters, marquee announcements, and digital communications.
- **Staffing Stability and Strategic Recruitment:**
For the first half of the school year, Havasupai Elementary School has maintained certified instructional staff in every classroom, marking a significant achievement in staffing stability. To ensure uninterrupted instruction, HES has contracted qualified educators through AB Staffing while onboarding permanent staff through HR processes.

Looking ahead, the team will focus on:

- **Curriculum Review and Instructional Monitoring:**
Formal curriculum reviews will be initiated to ensure alignment with adopted standards and instructional goals. Walkthroughs using student-centered tools will continue, with plans to pilot a teacher-centered tool in the next semester.
- **Policy and Procedure Finalization:**
Several key documents including the library handbook, counseling handbook, class coverage protocol, and student activity plan are in final stages and will be submitted for school board approval. A process is also being developed to review and revise school policies in collaboration with external partners.
- **Cultural Integration and Community Engagement:**
Teachers are working to embed cultural content into instruction. A framework for incorporating culture across subject areas will be developed. Monthly cultural themes will guide this work. Once the framework is complete, it will be submitted for tribal approval.
- **Academic and Career Counseling:**
Career aptitude assessments have been started for middle school students. Academic and career planning will begin, and a high school transition event is scheduled for spring.
- **Lesson Plan Management and Technology Integration:**
Teachers are using a standardized lesson plan template to document instruction, learning objectives, and differentiation strategies. While Schoology implementation is ongoing, lesson plans are currently being uploaded to SharePoint. Additional training and support will be provided to ensure full adoption.
- **Professional Development and Data Use:**
Weekly PLCs and data meetings are being used to guide instructional improvement. A living PD calendar tracks completed and upcoming trainings, including those focused on assessment, curriculum, and instructional strategies.

- **Reinforcing Compliance:**

The school is preparing for the BIE Fiscal and Programmatic monitoring visit scheduled for January 2026. All documentation, including technical assistance plans and follow-up records, will be used to support compliance.

This updated work plan continues to outline corrective actions and provide a status update aligned with regulatory requirements. All supporting documentation and resources are maintained on the school's SharePoint and [Padlet](#) platforms for transparency and accessibility. Progress will continue to be reviewed and reported every 90 days.

For questions or additional information about this work plan, please contact:

Ms. Frankie Chretien

Education Program Specialist (Compliance)

 frances.chretien@bie.edu |  (771) 233-7521

[Compliance Resource Padlet](#)

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 to written work plan provided to Assistant Secretary-Indian Affairs, BIE Director, Facilitator, Plaintiffs, and 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 the annual report on the 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 the annual report at Havasupai Elementary School Bureau of Indian Education (bie.edu)	Compliance Specialist, BIE, and BIE Communications Director

Table of Contents

25 CFR §36.11 Standard II - Administrative Requirements	6
25 CFR §36.20 Standard V - Minimum Academic Programs/ School Calendar	8
25 CFR §36.21 Standard VI - Kindergarten Instructional Program	12
25 CFR §36.22 - Standard VII - Elementary Instructional Program	14
25 CFR §36.23, Standard VIII - Junior High/Middle School Instructional Program	17
25 CFR §36.30, Standard X - Grading Requirements	20
25 CFR §36.31, Standard XI - Student Promotion Requirements	23
25 CFR §36.40, Standard XIII - Library/Media program	23
25 CFR §36.41, Standard XIV - Textbooks	27
25 CFR §36.42, Standard XV - Counseling Services	28
25 CFR §36.43, Standard XVI - Student Activities	31
25 CFR §36.51, Standard XVIII - Office of Indian Education Programs and Agency Monitoring and Evaluation Responsibilities	32
Summary of HES Annual Report	33

25 CFR §36.11 Standard II - Administrative Requirements

Legal Citation: 25 CFR §36.11(a)(5)

February 2025 Annual Report Finding

Evidence Required for Compliance

- Teacher/Substitute/Paraprofessionals roster with certification status and expiration dates.
- Documentation of class coverage assignments (dates, duration, teacher replaced, position).
- A procedure and contingency plan for class coverage.

Corrective Action	Status/Progress
Establish a Substitute Teacher Protocol: Develop and implement a formal substitute teacher protocol, to be included in the HES Staff Handbook.	<ul style="list-style-type: none">• In Progress—The substitute teacher protocol has been drafted and is being reviewed by the ERC.
Monitor and Evaluate Coverage Practices: Review and update the school’s substitute and class coverage tracker to ensure: <ul style="list-style-type: none">• Accurate documentation of teacher absences and substitute assignments• Compliance with the 20-day limit for non-certified instructional coverage• Timely identification of staffing gaps requiring administrative intervention	<ul style="list-style-type: none">• Not Started— No evidence of tracking class coverage has been demonstrated.

Legal Citation: 25 CFR §36.11(c)

February 2025 Annual Report Finding

Evidence Required for Compliance:

- Student Immunization Records with dates, provider info, and vaccine types.
- Exemption Forms (medical, personal belief).
- Indian Student Equalization Program (ISEP) report: review of immunizations

Corrective Action	Status/Progress
Strengthen Collaboration with Indian Health Service (IHS): Work with Indian Health Service (IHS) staff to utilize existing parent-signed release forms, ensuring they are properly completed and on file. This will allow the school to directly access student immunization records from IHS.	<ul style="list-style-type: none">• Cancelled—The Principal and the IHS public health nurse have collaborated to review immunizations. Once the NASIS system is set up, monitoring of updated immunizations will be done through this system.
Training on NASIS Data Entry: Schedule and conduct training for administrative staff, including the school secretary, on how to accurately enter and manage immunization data in the Native American Student Information System (NASIS).	<ul style="list-style-type: none">• Not Started—This training has not been scheduled.
Data Entry and Record Maintenance: Enter all current student immunization records into NASIS to ensure centralized, accessible, and up-to-date documentation.	<ul style="list-style-type: none">• Not Started—This action step is contingent on training for the school staff to utilize this system to monitor immunizations.
Ongoing Compliance Monitoring: The Education Resource Center (ERC) will review immunization records during both the fall and spring ISEP audits to verify compliance with immunization policies and procedures.	<ul style="list-style-type: none">• Ongoing—The ERC monitors immunizations and gives the school feedback based on findings. The flag students with missing immunizations. The Fall ISEP review has been conducted.

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

<u>Legal Citation: 25 CFR §36.20(b)</u>
<u>February 2025 Annual Report Finding</u>
<p>Evidence Required for Compliance</p> <ul style="list-style-type: none">• Documentation that services were provided. Language Assessment such as class record book, attendance records, or student work.• Lesson Plans or curriculum map.• Tribal Approval Documentation for curriculum and language programs.• Lesson plans with documented culture connection in each core area.• Learning Style Inventories and/or compiled classroom data.• Lesson plan documentation of learning styles addressed.

Corrective Action	Status/Progress
Lesson Plan Documentation <ul style="list-style-type: none"> Continue using the current lesson plan template, which includes required fields for documenting cultural integration and learning styles. Teachers will identify which learning styles are addressed and describe corresponding instructional activities. 	<ul style="list-style-type: none"> On Track—All teachers are using the lesson plan template to document integration of Native American culture in all subjects. On Track—Learning style activities are documented and described in teacher’s lesson plans.
Professional Development and Support <ul style="list-style-type: none"> Provide professional development to share resources for cultural integration. Offer examples and strategies to help teachers meaningfully incorporate culture into core content areas. 	<ul style="list-style-type: none"> Ongoing—PD will be provided based on lesson plan reviews and walkthrough data on where support is needed. <ul style="list-style-type: none"> Professional development was provided on November 5, 2025, by the Facilitator to share an activity for integration of Native American culture. The Community Connections event was held on September 12, 2025. During this event, community members had the opportunity to share what they would like teachers to know about working with children in Supai Village, how they would like culture and language to be woven into the school day, what cultural beliefs they would like teachers, administrators and staff to be aware of. The ADD BIE culture and Language Specialist will provide PD to teachers on December 17, 2025, on resources for cultural integration for lesson, school wide, counselors and assessment.
Monitoring and Feedback <ul style="list-style-type: none"> The principal will continue conducting regular classroom walkthroughs to observe implementation of cultural and learning style components. Feedback will be provided to teachers to support continuous improvement. 	<ul style="list-style-type: none"> Ongoing/On Track—The principal is using the ELEOT tool to conduct teacher walkthroughs. All teachers that were at the school since the beginning of the school year have had at least 10 documented walkthroughs with feedback in the first quarter. A walkthrough checklist was shared with the principal on cultural curriculum and instruction incorporating Havasupai culture and global perspectives.
Tribal Collaboration and Curriculum Approval <ul style="list-style-type: none"> Maintain documentation of tribal approval for the culture and language curriculum currently in use. Develop a basic framework or guidance document to support teachers in integrating Native American culture across all subjects. 	<ul style="list-style-type: none"> Completed—The tribe did approve the curriculum that the culture and language teacher is using to teach. In Progress—A framework is being developed for teachers to integrate Native American culture across all subjects.

<p>Culture and Language Program Support</p> <ul style="list-style-type: none"> • Provide technical assistance to the culture and language teacher to support the development of lesson plans and basic assessment documentation. 	<ul style="list-style-type: none"> • Not Started—The ADD culture and Language Specialist will set -up a meeting to provide this support. Culture and language instruction is occurring using the curriculum approved by the tribe. They are starting reoccurring Friday meetings to provide support on lesson planning and assessing. They will also do methodology training.
<p>Learning Style Data Utilization</p> <ul style="list-style-type: none"> • Teachers will continue administering and maintaining learning style inventories. • Use this data to inform instructional planning and differentiation, as documented in lesson plans. 	<ul style="list-style-type: none"> • On Track—Teachers administered a learning style assessment at the beginning of the school year. • Data and learning style activities are documented in teacher lesson plans.

February 2025 Annual Report Finding

Evidence Required for Compliance

- Master Schedules.
- Staff Rosters with assignments
- Lesson Plans, Logs or documentation of services (attendance, gradebooks, student work from intraschool programs)

Corrective Action	Status/Progress
Master Schedule Development <ul style="list-style-type: none">• Create and maintain a comprehensive master schedule that includes all intraschool programs (e.g., library, instructional labs, physical education, music) from the beginning of the school term through the end of the school year.	<ul style="list-style-type: none">• On Track—HES has been implementing Genius Time at the end of each school day. Students rotate through a variety of activities such as Physical Education, Art, Life Skills, Leadership, Library, and STEAM. Genius time is inquiry-based, student-directed learning scheduled daily on a rotation basis. It provides extracurricular activities for students wherein they can explore interests, develop skills, and foster a sense of belonging, which supports mental health and overall well-being.
Continuity of Instructional Services <ul style="list-style-type: none">• Provide curriculum, instructional materials, and training to all relevant staff to ensure that intraschool programs can continue uninterrupted, even in the absence of the assigned teacher.	<ul style="list-style-type: none">• On Track—Teachers are provided with curriculum and resources to ensure that intraschool programs continue in the absence of a teacher. The Art teacher that started the year had to leave her position and another teacher was given the instructional materials and resources to step in and take over art instruction. At this time, HES has teachers assigned to library and PE.

25 CFR §36.21 Standard VI - Kindergarten Instructional Program

Legal Citation: 25 CFR §36.21

February 2025 Annual Report Finding

Evidence Required for Compliance

- Kindergarten Curriculum Maps and/or Lesson Plans.(Gen ed, PE SEL, health, Culture)
- Class records: attendance, grade books, and Student Work Samples

Corrective Action	Status/Progress
<p>Instructional Planning: Teachers will develop and submit weekly lesson plans using the designated template. These plans will document:</p> <ul style="list-style-type: none"> • Alignment with 25 CFR § 36.21 requirements (e.g., language development, environmental exploration, psychomotor and social development, creativity, and health education). • Integration of curriculum materials and interdisciplinary content. 	<ul style="list-style-type: none"> • On Track—The kindergarten teacher is using the designated lesson plan template to document lessons taught using the selected curriculum. The selected curriculum does align with the requirements of this regulation. • On Track—Students receive instruction in physical Education, social emotional learning and health as documented in lesson plans for these areas. • In Progress—Students do receive Havasupai culture and language instruction once per week. Lesson plan documentation in this class is an area to be developed. • Delayed—The school is still planning to adopt Schoology as an eLMS, but they are working through the kinks of implementation. Training for Schoology happened or is scheduled as follows: <ul style="list-style-type: none"> ○ Fall dates: August 19, 2025, and October 17, 2025 ○ Future dates: January 8, 2025; February 13, 2025; March 23, 2025; May 8, 2025.
<p>School-Level Monitoring: The school principal will:</p> <ul style="list-style-type: none"> • Review lesson plans to verify alignment with regulatory standards. • Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans. 	<ul style="list-style-type: none"> • Not Started—The principal does collect lesson plans and uploads them to the school SharePoint site. Documented reviews have not yet started. • In Progress—The Principal completed regular documented walkthroughs with feedback given. The curriculum and instruction specialist has met with the principal to provide support on reviewing lesson plans before walkthroughs.
<p>Oversight and Support by ADD-BOS: ADD-BOS staff will:</p> <ul style="list-style-type: none"> • Monitor both teacher lesson plans and the principal's documentation of reviews and walkthroughs. 	<ul style="list-style-type: none"> • On Track—The curriculum and Instruction specialist monitors lesson plans and walkthrough data monthly. She is currently developing a checklist to document this process and to

<ul style="list-style-type: none"> • Provide feedback and ensure that regulatory elements are consistently implemented and monitored. • The Curriculum and Instruction Specialist will offer technical assistance and professional development as needed. 	<p>provide consistency for all BOS lesson plan reviews.</p> <ul style="list-style-type: none"> • On Track—The curriculum and Instruction Specialist provided feedback to the principal on walkthrough data and lesson plans. • On Track—The curriculum and Instruction Specialist met with the teacher individually to provide support with planning and documenting integrated areas into the lesson plans.
<p>Student Work Documentation: Teachers will maintain portfolios of student work samples that demonstrate required instructional components outlined in 25 CFR § 36.21.</p>	<ul style="list-style-type: none"> • Ongoing—The teachers are gathering and maintaining work samples. Samples will be reviewed during compliance specialist site visits.
<p>Curriculum Reflection and Review: At the conclusion of each instructional unit, teachers will complete curriculum map reflections. These reflections will be reviewed by ADD-BOS staff to assess instructional effectiveness and identify areas for improvement.</p>	<ul style="list-style-type: none"> • Delayed—The teachers received training from the curriculum and Instruction specialist on September 24, 2025, on using curriculum maps. It was reported that the teachers have not started unit reflections. The curriculum and instruction specialist will reach out to teachers individually follow-up and provide support.

25 CFR §36.22 - Standard VII - Elementary Instructional Program

<u>Legal Citation: 25 CFR §36.22</u>
<u>February 2025 Annual Report Finding</u>
<p>Evidence Required for Compliance</p> <ul style="list-style-type: none">• Master Schedule showing instructional time for each subject across all grades.• Class Schedules• Curriculum Maps and Pacing Guides for each content area and/or Lesson Plans demonstrating in instruction is all areas.• Class records: attendance, grade books, and Student Work Samples, walkthrough data

Corrective Action	Status/Progress
<p>Instructional Planning: Teachers will develop and submit weekly lesson plans using the designated template. These plans will document:</p> <ul style="list-style-type: none"> Clearly identify instruction in the six required subject areas: language arts, mathematics, social studies, science, fine arts, and physical education. Integrate the five mandated content areas: career awareness, environmental and safety education, health education, metric education, and computer literacy. 	<ul style="list-style-type: none"> On Track—Teachers are using the designated lesson plan template to document lessons taught using the selected curriculum. The selected curriculum does align with the requirements of this regulation. Pending Review—Students receive instruction in physical education, art, and health during Genius time. Lesson plans were recently submitted and will be reviewed. On Track—Integrated areas are documented on the lesson plan template. The curriculum and instruction specialist met with teachers to improve description of integrated areas in lesson plans. Delayed—The school is still planning to adopt Schoology as an eLMS, but they are working through the kinks of implementation. Training for Schoology happened or is scheduled as follows: <ul style="list-style-type: none"> Fall dates: August 19, 2025, and October 17, 2025 Future dates: January 8, 2025; February 13, 2025; March 23, 2025; May 8, 2025.
<p>School-Level Monitoring: The school principal will:</p> <ul style="list-style-type: none"> Review lesson plans to verify alignment with regulatory standards. Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans. 	<ul style="list-style-type: none"> Not Started—The principal does collect lesson plans and uploads them to the school SharePoint site. Documented reviews have not yet started. In Progress—The Principal completed regular documented walkthroughs with feedback given. The curriculum and instruction specialist has met with the principal to provide support on reviewing lesson plans before walkthroughs.
<p>Oversight and Support by ADD-BOS: ADD-BOS staff will:</p> <ul style="list-style-type: none"> Monitor both teacher lesson plans and the principal's documentation of reviews and walkthroughs. Provide feedback and ensure that regulatory elements are consistently implemented and monitored. The Curriculum and Instruction Specialist will offer technical assistance and professional development as needed. 	<ul style="list-style-type: none"> On Track—The curriculum and Instruction specialist monitors lesson plans and walkthrough data monthly. She is currently developing a checklist to document this process and to provide consistency for all BOS lesson plan reviews. On Track—The curriculum and Instruction Specialist provided feedback to the principal on walkthrough data and lesson plans. On Track—The curriculum and Instruction Specialist met with the teachers individually to provide support with planning and documenting integrated areas into the lesson plans.
<p>Student Work Documentation: Teachers will maintain portfolios of student work that demonstrate engagement with both the core subjects</p>	<ul style="list-style-type: none"> Ongoing—The teachers are gathering and maintaining work samples. Samples will be

and integrated content areas. These portfolios will serve as evidence of instructional implementation and student learning.	reviewed during compliance specialist site visits.
Curriculum Reflection and Review: At the conclusion of each instructional unit, teachers will complete curriculum map reflections. These reflections will be reviewed by ADD-BOS staff to assess instructional effectiveness and identify areas for improvement.	<ul style="list-style-type: none"> Delayed—The teachers received training from the curriculum and Instruction specialist on September 24, 2025, on using curriculum maps. It was reported that the teachers have not started unit reflections. The curriculum and instruction specialist will reach out to teachers individually follow-up and provide support.

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

<u>Legal Citation: 25 CFR §36.23</u>
<u>February 2025 Annual Report Finding</u>
<p>Evidence Required for Compliance</p> <ul style="list-style-type: none">• Curriculum Maps showing vertical alignment across grade bands.• BIE One Plan• Student Schedules and report cards/Transcripts showing completion of required units.• Master Schedule showing instructional time for each subject across all grades.• Class Schedules• Curriculum Maps and Pacing Guides for each content area and/or Lesson Plans demonstrating in instruction is all areas.• Class records: attendance, grade books, and Student Work Samples, walkthrough data

Corrective Action	Status/Progress
Develop and Adopt a School Philosophy Statement <ul style="list-style-type: none"> Create a clear, inclusive school philosophy that reflects the values, goals, and cultural identity of the Havasupai community. Ensure the philosophy is informed by the needs assessment and is visibly embedded in instructional planning, school policies, and classroom practices 	<ul style="list-style-type: none"> Delayed—A draft of a philosophy has been drafted utilizing school vision, mission , values and goals. It will be presented to the internal BOS/BIE team on December 16th. Next steps to involve the students, families, school staff and tribe in the development will be planned during this meeting.
Implement a Progressive Instructional Program <ul style="list-style-type: none"> Ensure teachers consistently use the adopted curricula for Reading/Language Arts, Mathematics, Science, and Social Studies. Align instruction across grade levels to support a progressive, developmentally appropriate continuum from elementary through middle school. 	<ul style="list-style-type: none"> On Track—Teachers are using the selected curriculum as evidenced by teacher lesson plans. The Savvas Curriculum provides a progressive instructional program.
Instructional Planning: Teachers will develop and submit weekly lesson plans using the designated template. These plans will document: <ul style="list-style-type: none"> Clearly identify instruction in the required subject areas: language arts, mathematics, social studies, science, fine and practical arts, Computer Literacy and physical education. Integrate the mandated content areas: career exploration, environmental and safety education, metric education, consumer economics and health. 	<ul style="list-style-type: none"> On Track—Teachers are using the designated lesson plan template to document lessons taught using the selected curriculum. The selected curriculum does align with the requirements of this regulation. Pending Review—Students receive instruction in physical education, art, and health during Genius time. Lesson plans were recently submitted and will be reviewed. On Track—Integrated areas are documented on the lesson plan template. The curriculum and instruction specialist met with teachers to improve description of integrated areas in lesson plans. Delayed—The school is still planning to adopt Schoology as an eLMS, but they are working through the kinks of implementation. Training for Schoology happened or is scheduled as follows: <ul style="list-style-type: none"> Fall dates: August 19, 2025, and October 17, 2025 Future dates: January 8, 2025; February 13, 2025; March 23, 2025; May 8, 2025.
School-Level Monitoring: The school principal will: <ul style="list-style-type: none"> Review lesson plans to verify alignment with regulatory standards. Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans. 	<ul style="list-style-type: none"> Not Started—The principal does collect lesson plans and uploads then to the school SharePoint site. Documented reviews have not yet started. In Progress—The Principal completed regular documented walkthroughs with feedback given. The curriculum and instruction specialist has met with the principal to provide support on reviewing lesson plans before walkthroughs.

<p>Oversight and Support by ADD-BOS: ADD-BOS staff will:</p> <ul style="list-style-type: none"> • Monitor both teacher lesson plans and the principal’s documentation of reviews and walkthroughs. • Provide feedback and ensure that regulatory elements are consistently implemented and monitored. • The Curriculum and Instruction Specialist will offer technical assistance and professional development as needed. 	<ul style="list-style-type: none"> • On Track—The curriculum and Instruction specialist monitors lesson plans and walkthrough data monthly. She is currently developing a checklist to document this process and to provide consistency for all BOS lesson plan reviews. • On Track—The curriculum and Instruction Specialist provided feedback to the principal on walkthrough data and lesson plans. • On Track—The curriculum and Instruction Specialist met with the teachers individually to provide support with planning and documenting integrated areas into the lesson plans.
<p>Student Work Documentation: Teachers will maintain portfolios of student work that demonstrate engagement with both the core subjects and integrated content areas. These portfolios will serve as evidence of instructional implementation and student learning.</p>	<ul style="list-style-type: none"> • Ongoing—The teachers are gathering and maintaining work samples. Samples will be reviewed during compliance specialist site visits.
<p>Curriculum Reflection and Review: At the conclusion of each instructional unit, teachers will complete curriculum map reflections. These reflections will be reviewed by ADD-BOS staff to assess instructional effectiveness and identify areas for improvement.</p>	<ul style="list-style-type: none"> • Delayed—The teachers received training from the curriculum and Instruction specialist on September 24, 2025, on using and curriculum maps. It was reported that the teachers have not started unit reflections. The curriculum and instruction specialist will reach out to teachers individually follow-up and provide support.

25 CFR §36.30, Standard X - Grading Requirements

<u>Legal Citation: 25 CFR §36.30</u>
<u>February 2025 Annual Report Finding</u>
<p>Evidence Required for Compliance</p> <ul style="list-style-type: none">• Grading Policy Documents outlining the uniform grading system and mastery-based criteria.(BIE grading policy) in the school handbook• Class Record Book• Report Cards and Progress Reports with documented learning outcomes. Assessment Feedback Samples and/or Parent-Teacher Conference Logs or communication records and or NASIS access report• Lesson Plans showing instructional adjustments based on evaluation data, and or curriculum maps.• Sample Report Cards showing all three required sections.• Signed Return Slips or digital acknowledgments from parents/guardians

Corrective Action	Status/Progress
Uniform Grading System Implementation <ul style="list-style-type: none"> Continue using the updated grading policy aligned with BIE's uniform grading system and mastery-based criteria, as documented in the school handbook. 	<ul style="list-style-type: none"> On Track—The updated grading policy has been added to the student handbook as an addendum. The grading policy does meet the criteria for this regulation.
Lesson Planning and Instructional Adjustments <ul style="list-style-type: none"> Teachers will use the current lesson plan template, which includes a section for data use and reteaching strategies based on formative and summative assessments. Provide targeted support and coaching to teachers to strengthen their use of data to inform instruction. 	<ul style="list-style-type: none"> On Track— The teacher lesson plan template includes a spot for instructional adjustments based on student data. On Track—The Curriculum and Instruction Specialist reviews lesson plans to ensure they meet regulatory requirements. She provides technical assistance to individual teachers based on her review. On Track—Teacher are keeping files in lieu of data binders of student data, assessments and work samples. In Progress—Teachers have had the following trainings on assessment and instruction: <ul style="list-style-type: none"> September 5, 2026-I-Ready Assessment and Instruction November 14, 2025-Using Assessment Data with UFLI and I-Ready December 5, 2025-How to use interim high stakes testing scores, assessment data, and i-Ready to adjust instruction
Parent and Student Communication <ul style="list-style-type: none"> Provide parents with NASIS access to monitor student progress. 	<ul style="list-style-type: none"> Complete—Parents do have access to the NASIS so they can monitor student progress.
Parent-Teacher and Student Conferences <ul style="list-style-type: none"> Hold parent-teacher conferences in both fall and spring. Document attendance and outcomes of conferences. 	<ul style="list-style-type: none"> On Track—Parent teacher conferences were held on November 7th for the Fall. Teachers documented efforts to reach parents. Outreach efforts included Facebook, School Newsletter, School Marquee, letters sent home, email, text messages. The next parent teacher conferences will be held on November 20, 2026. On Track—Attendance was tracked for conferences. Parents signed a copy of student report cards after reviewing with the teacher.
Report Card Distribution and Documentation <ul style="list-style-type: none"> Issue report cards at least four times per year, ensuring they include: <ul style="list-style-type: none"> Recommendations and probable promotion status Attendance records Signature lines and return requests 	<ul style="list-style-type: none"> On Track—Report cards were issued for the first quarter, they included probable promotion status, attendance and signature lines. Report cards were signed by teacher and parents.

<ul style="list-style-type: none">• When parents do not attend conferences, send report cards home with students and request signed return slips for inclusion in cumulative records.	
---	--

25 CFR §36.31, Standard XI - Student Promotion Requirements

Legal Citation: 25 CFR §36.31

February 2025 Annual Report Finding

Evidence Required for Compliance

- Approved promotion policy with school board and EPA signatures
- Class record books showing use of criterion-referenced assessments
- Student attendance records with documentation of excused absences or alternative instructional participation
- Written appeals or committee overrides for exceptional cases

Corrective Action	Status/Progress
Maintain and Review the Approved Promotion Policy <ul style="list-style-type: none"> • Continue implementation of the approved promotion policy, which includes mastery-based criteria and attendance requirements. • Review the policy annually to ensure continued alignment with 25 CFR § 36.31 and update as needed. 	<ul style="list-style-type: none"> • On Track—The promotion policy is approved by the EPA and meets the criteria in this regulation.
Use of Criterion-Referenced Assessments <ul style="list-style-type: none"> • Teachers will use criterion-referenced tests aligned to grade-level standards to evaluate student mastery of instructional objectives. 	<ul style="list-style-type: none"> • On Track—Teachers are using assessments from the Savvas curriculum that are criterion referenced and assess grade level standards and lesson objectives.
Promotion Review Committee Process <ul style="list-style-type: none"> • The MTSS/Student Success Team will review promotion decisions for students who do not meet attendance or academic criteria. • Ensure that any overrides or appeals are documented in writing and reviewed by the EPA, as required. 	<ul style="list-style-type: none"> • Not Started—This process is written into the policy, but this will be done at the end of the school year.

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

<u>Legal Citation: 25 CFR §36.40</u>
<u>February 2025 Annual Report Finding</u>
<p>Evidence Required for Compliance</p> <ul style="list-style-type: none">• Library/media program objectives document.• Documentation showing student/staff input.• Annual evaluation documentation by the principal and librarian.• Written policy for the selection of materials and equipment that identifies the library committee members and is approved by the school board.• Annual Inventory reports with item counts by category.• Requisitions and invoices for purchased library materials.• Master schedule or class schedule identifying library time.

Corrective Action	Status/Progress
Finalize Library Instructional Objectives Document <ul style="list-style-type: none"> Complete and adopt the library/media program's instructional and service objectives, ensuring alignment with the school's SMART goals, philosophy, and community needs. Schedule an annual evaluation of these objectives by the principal and designated library lead at the end of each school year. 	<ul style="list-style-type: none"> In Progress— A Handbook was developed to outline and meet the requirements outlined under 25 CFR 36.40. It is a comprehensive document that outlines key policies and procedures including: (1) Instructional and Service Objectives, (2) Role and draft completed in November 2025. The library handbook draft is complete and under review by the school board. It includes instructional and service objectives that support the school's SMART goals. Deferred—The annual evaluation will take place at the end of the school year. Moving forward the annual evaluations will happen through the BIE One Plan process.
Establish the Library Committee <ul style="list-style-type: none"> Formally establish the Library Committee, as outlined in the Library Handbook. Ensure the committee includes staff, students, and community representation. 	<ul style="list-style-type: none"> In Progress—The handbook identifies the composition of the library committee. The committee has not yet been established. In Progress—Although the committee has not yet been established. Data was collected from the students, parent and staff in the development of the handbook.
Approve Library Policy and Selection Guidelines <ul style="list-style-type: none"> Finalize the draft policy for the selection of materials and equipment. Present the policy to the school board for review and approval, incorporating feedback as needed. 	<ul style="list-style-type: none"> In Progress—The library handbook includes the policy for selection of materials and equipment. In Progress—The library policy was presented to the School Board on November 18, 2025. It is in review by the School Board.
Maintain and Expand the Library Collection <ul style="list-style-type: none"> Continue cataloging and inventorying books using the Little Library System. Ensure the collection meets ADM-based book ratios 	<ul style="list-style-type: none"> In Progress—The initial inventory of the library was done in August. In phase 2 of the library plan, the books need to be catalogued, and more information added on each book.
Library Access and Scheduling <ul style="list-style-type: none"> Add library time to the school's master schedule once staff training is completed. Ensure all students and teachers are entered into the library system and can check out materials during scheduled times. 	<ul style="list-style-type: none"> Complete—Library is on the school's master schedule, and student receive library services during genius time. Complete—Student and teachers are entered into the Little Library System and can check out books during their scheduled library time.
Staffing and Interim Support <ul style="list-style-type: none"> Train designated teaching staff to facilitate library specials. Utilize community volunteers to support library operations and events. 	<ul style="list-style-type: none"> Complete—A certified teacher has been assigned to the library special. She has been trained on using the Little Library System. <ul style="list-style-type: none"> All Teachers were trained on the Little Library System. Not Started—A community volunteer has been cleared to assist with library events and

	operations. This volunteer has not started work in the library.
--	---

25 CFR §36.41, Standard XIV - Textbooks

Legal Citation: 25 CFR §36.41

February 2025 Annual Report Finding

Evidence Required for Compliance

- List of Committee Members with roles and affiliations.
- Documentation showing School Board approval of appointments.
- Documentation of Textbook Review Procedure and criteria for annual review

Corrective Action	Status/Progress
Establish the Textbook Review Committee <ul style="list-style-type: none"> • Form a leadership team composed of school staff to manage the textbook review committee and process. • Recruit and develop a parent, school board, and student panel to advise the leadership team and participate in the review process. • Collaborate with the facilitator to enlist parent participants and ensure community representation. • Submit the full committee membership list, including roles and affiliations, to the school board for formal approval. 	<ul style="list-style-type: none"> • In Progress—The draft of the HES leadership and textbook committee guidelines document is created and in review by the ERC. • In Progress—Nominations for the leadership team will be submitted by the school by December 2, 2025, for the leadership team. • In Progress—A meeting is scheduled with the facilitators to strategically plan for community involvement in the textbook committee. • In Progress—Once the committee is finalized, it will be presented to the school board for approval.
Develop Review Procedures and Criteria <ul style="list-style-type: none"> • Collaborate with the ADD-BOS Curriculum and Instruction Education Specialist and utilize resources from the WestEd curriculum team to develop: <ul style="list-style-type: none"> • A written textbook review procedure • Clear criteria for evaluating instructional materials <ul style="list-style-type: none"> • Textbooks shall meet course objectives • Reflect cultures accurately • Be in good physical condition and varied in reading levels 	<ul style="list-style-type: none"> • On Progress—The textbook review will happen annually at the end of the school year to plan for the following school year.

25 CFR §36.42, Standard XV - Counseling Services

Legal Citation: 25 CFR §36.42	
February 2025 Annual Report Finding	
Evidence Required for Compliance	
<ul style="list-style-type: none">• Counseling Program Plan• Counselor schedule and job description• Student support logs• Stakeholder feedback surveys• Assessment reports• Staff list with certifications• Confidentiality procedures• Academic and career plans (middle school)• Transition tracker• Crisis counseling protocols• Documentation of tribal concurrence and cultural sensitivity	

Corrective Action	Status/Progress
Develop a Counseling Program Plan <ul style="list-style-type: none"> Create a written counseling program plan that outlines services in the physical, social, emotional, intellectual, and vocational domains. 	<ul style="list-style-type: none"> In Progress—The Counseling Handbook is in review by the BOS team.
Establish Counselor Schedule and Documentation System <ul style="list-style-type: none"> Develop a counselor schedule that reflects time for individual, group, and preventative services. Maintain service logs and/or student support documentation to track delivery and impact. 	<ul style="list-style-type: none"> Complete—The counselor has a schedule with time built in for counseling and preventive services. Ongoing—The counselors provide Social Emotional Learning lessons to all students. They write lesson plans to document content and activities. Pending Review—The Counselors are keeping service logs. These will be reviewed by the compliance specialist during the next site visit.
Ensure Cultural Relevance and Community Input <ul style="list-style-type: none"> Collaborate with tribal representatives and the culture teacher to ensure counseling services reflect community values and cultural sensitivity. Document tribal concurrence and cultural integration efforts. 	<ul style="list-style-type: none"> In Progress— The community Connections event was held on September 12, 2025. During this event, community members had the opportunity to share what they would like teachers to know about working with children in Supai Village, how they would like culture and language to be woven into the school day, what cultural beliefs they would like teachers, administrators and staff to be aware of. In Progress—The handbook outline practices and cultural integration is in review and will be submitted to the tribe and school board once finalized.
Maintain Confidentiality and Security <ul style="list-style-type: none"> Secure a locking file cabinet and private workspace for counseling records. Develop and implement confidentiality procedures in collaboration with the ADD-BOS Behavioral Health Specialist. 	<ul style="list-style-type: none"> Complete—The counselor has a locking file cabinet in a secure location. In Progress— Confidentiality procedures are outlined in the counseling handbook that is currently being reviewed.
Support Academic and Career Planning <ul style="list-style-type: none"> Schedule academic counseling for middle school students twice yearly. Use career interest inventories to inform written academic and career plans. Track student transitions to high school with a transition plan or tracker. Schedule events to inform students and families of options for boarding schools. 	<ul style="list-style-type: none"> Delayed—The counselor has not started academic counseling for students but is in process of scheduling time to meet students. In Progress—The counselor is in process of administering career interest inventories. Some students require one on one support with this task, so this time with students is scheduled. Ongoing—Tracking of student transition to high school will start in the spring. Delayed—Tentative activities have been put on a calendar. The BOS team is supporting the counselor to reach out to Off Reservation

	Boarding schools to schedule virtual tours and question and answer sessions.
--	--

25 CFR §36.43, Standard XVI - Student Activities

Legal Citation: 25 CFR §36.43

February 2025 Annual Report Finding

Evidence Required for Compliance

- Schoolwide Activity Plan approved by the school board and school supervisor
- Qualified activity sponsor rosters and assignments
- Individual activity operation plans
- Orientation/training sign-in sheets
- Safety protocols in the staff handbook
- Fundraising plans and financial reports (if applicable)

Corrective Action	Status/Progress
Develop and Approve the Schoolwide Activity Plan <ul style="list-style-type: none"> • Incorporate the 21st Century Grant activities to the requirements of 25 CFR § 36.43 schoolwide activity plan. • Compile a Schoolwide Activity Plan that includes student activities, objectives, and alignment with student needs. • Submit the activity plan to the school board and school supervisor for approval. 	<ul style="list-style-type: none"> • Completed—A school wide activity plan has been created. It maps the program components of 21st Century to the requirements for this regulation. • In Progress—The schoolwide activity plan was presented to the HES school board in November, for approval. The school board is reviewing the plan. • Cancelled—a student activity handbook is not necessary for compliance with this regulation. Requirements can be met with the student activity plan and protocols in the staff handbook.
Sponsor Assignment and Training <ul style="list-style-type: none"> • Assign qualified staff sponsors to each activity. • Maintain a roster of sponsors with their school roles and assigned activities. • Provide orientation and training to sponsors, including expectations, safety protocols, and documentation procedures. 	<ul style="list-style-type: none"> • In Progress—An application for activity sponsors has been drafted and shared with staff. • Not Started—Orientation will be scheduled once staff sponsors are selected and assigned.
Safety and Compliance Protocols <ul style="list-style-type: none"> • Include event safety protocols and student supervision guidelines in the staff handbook. • Ensure all student activities are school-sanctioned and follow established procedures. 	<ul style="list-style-type: none"> • Completed—Staff were trained on safety protocols in August and were given a copy of the emergency action plan.

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

Legal Citation: 25 CFR §36.51

February 2025 Annual Report Finding

Evidence Required for Compliance

- (a)(b) Monitoring Schedules (3-year cycle)
 - HES Monitoring Reports and Technical Assistance Plans
 - Follow-up Documentation
 - School Board Reporting
 - BIE Annual Summative Evaluation Reports
- (e) Reports submitted to the Director summarizing school or Agency/Area performance
 - BIE Policy Review Report
 - External Evaluator Documentation (if applicable)

Corrective Action	Status/Progress
Participate in Scheduled Monitoring Visit <ul style="list-style-type: none"> Prepare for the upcoming onsite monitoring scheduled for the week of January 12, 2026, coordinated by the BIE's Chief Performance Office (CPO). 	In Progress— Preparations are underway for the onsite monitoring visit scheduled for the week of January 12, 2026, led by the CPO. HES leaders have been engaged, and readiness efforts are progressing to ensure a smooth and compliant review.
Final Monitoring Report and Technical Assistance Plan <ul style="list-style-type: none"> The school and Education Resource Center (ERC) will receive a written monitoring report and technical assistance plan within 30 days. Maintain documentation of follow-up actions and resolution of findings. 	Not Started - Will be initiated after the January 12, 2026 visit.
School Board and Stakeholder Engagement <ul style="list-style-type: none"> BIE will invite the school board to participate in the monitoring process, including interviews and the exit meeting. BIE will provide the HES school board with a written report. 	Not Started - Will be initiated during the January 12, 2026 visit.
Annual Policy Evaluation Requirement <ul style="list-style-type: none"> Continue collaboration with WestEd and the BIE Chief Performance Office to conduct a summative evaluation of BIE policies and administrative procedures. Submit the final evaluation report to the BIE Director. 	In Progress— Collaboration is ongoing with BIE CPO and WestEd to complete a summative evaluation of BIE policies and procedures. The review focuses on identifying barriers to school compliance and recommending improvements. Final report planning is underway for submission to the BIE Director.

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		X	

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

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

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

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

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

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

	Requirement Met	Non-Compliance	Not Applicable
§36.51(a)- The Office of Indian Education Programs shall monitor and evaluate the conformance of each <u>Agency</u> or Area, as appropriate, and its <u>schools</u> with the requirements of this part.		X	
§36.51(b)- Each <u>Agency</u> or Area, as appropriate, in conjunction with its <u>school board</u> shall monitor and evaluate the conformance of		X	

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.			
§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	