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# Havasupai Elementary School Work Plan

Updated March 2026

## **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. All updates are posted online and available to the public.

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. The next annual report will be issued on June 4, 2026, and continue being issued annually through June 4, 2028.

A detailed table summarizing the full compliance timeline and associated activities for 2025–2026 is provided in the **Appendix** at the end of this document.

## **Havasupai Elementary School 90-Day Work Plan**

### **Overview**

Since the December 2025 update, HES has made significant progress toward compliance with 25 CFR Part 36. At the mid-year checkpoint, the school achieved approximately 75% compliance, up from 28% compliance reported in the February 2025 Annual Report. This improvement reflects a collaborative approach, consistent monitoring, and targeted corrective actions.

The Fiscal and Programmatic Monitoring Visit occurred in the week of January 12, 2026, and findings will inform ongoing compliance efforts. Bi-weekly coordination meetings with the Compliance Specialist, ERC, and BOS teams continue to support accountability and transparency. All compliance resources remain accessible via the school's SharePoint and Padlet platforms.

### **Key Progress Highlights**

#### **1. School Board Policy Actions and Updates**

- Completed: Library Handbook, Counseling Handbook, Class Coverage Protocol, and Schoolwide Activity Plan.
- School Board Approvals Completed (March 4, 2026): The School Board approved the Library Handbook, the Schoolwide Activity Plan, and formally approved the Textbook Review Committee.
- Textbook Review Standard Operating Procedure (SOP): Previously presented to the School Board on January 20, 2026; committee is now fully approved and authorized to begin work.

#### **2. Instructional Improvements**

- Teachers consistently use the standardized lesson plan template documenting core subjects and integrated areas.
- Schoology implementation is ongoing with regular site visits and training from the STEP team.
- Students now receive physical education four days per week.

- Walkthroughs have shifted to longer, more focused observations emphasizing fidelity to curriculum and planning.
- 3. Library and Textbook Initiatives**
- Library Committee established: Includes two teachers, student council president and vice president, the principal, and the school board.
  - Selection Policy: Completed and shared with the school board; It was approved during a special meeting on March 4, 2026.
  - Collection Maintenance: Plan refined for summer cataloging by on-site staff.
  - Volunteer Engagement: Scope of work being developed for cleared community volunteer.
- 4. Counseling and Student Support**
- Counseling program guided by the handbook; counselor maintains service logs and lesson plans.
  - Academic and Career Planning:
    - Career inventories completed for 8th grade (8/8), 7th grade (5/5), and 6th grade (5/6).
    - Academic counseling completed for 8th grade (8/8), 7th grade (3/5), and 6th grade (2/6).
    - Boarding School Exposure: Students participated in a virtual tour of Riverside Indian School on February 12, 2026, led by Havasupai students currently enrolled. Planning for Sherman Indian School tour is underway.
- 5. Student Activities**
- Schoolwide Activity Plan approved by the School Board on March 4, 2026.
  - Activities launched the week of February 17, 2026, including: Adventure & Recreation Club, Supai Chefs, Tutoring, Lego STEAM, Chicken Husbandry, Sports Club, Basketball, Coding Club, Yearbook/Photography, and Hydroponics.
  - Staff trained on expectations for sponsoring after-school programs.

### Areas Needing Continued Focus

- Cultural Integration: Develop and implement a framework for embedding cultural content across subjects; submit for tribal approval.
- Instructional Documentation: Strengthen evidence of language and culture instruction and assessment practices.
- Library Cataloging: Execute summer plan for inventory and cataloging.
- Full Schoology Implementation: Continue training and support for all teachers.

### Looking Ahead

- Implement newly approved documents and launch Textbook Review Committee.
- Conduct annual evaluations of library objectives through the BIE One Plan process.
- Expand academic counseling and finalize transition plans for high school.
- Continue professional development focused on data-driven instruction and cultural integration.
- Maintain momentum on student activities and community engagement.

This updated work plan continues to outline corrective actions and provide status updates 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 to ensure continuous improvement and compliance with 25 CFR Part 36.

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

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[Compliance Resource Padlet](#)

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## 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
<p><b>Establish a Substitute Teacher Protocol:</b> Develop and implement a formal substitute teacher protocol, to be included in the HES Staff Handbook.</p>	<ul style="list-style-type: none"> <li>• <b>Completed</b>—A substitute teacher and class coverage protocol has been created and is being implemented by the school principal. It is on the school SharePoint site and will be added to the staff handbook for School Year 2026-2027.</li> </ul>
<p><b>Monitor and Evaluate Coverage Practices:</b> Review and update the school’s substitute and class coverage tracker to ensure:</p> <ul style="list-style-type: none"> <li>• Accurate documentation of teacher absences and substitute assignments.</li> <li>• Compliance with the 20-day limit for non-certified instructional coverage.</li> <li>• Timely identification of staffing gaps requiring administrative intervention.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>— Class coverage is being tracked on a spreadsheet. All coverage has been provided by certified teachers.</li> </ul>

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
<p><b>Strengthen Collaboration with Indian Health Service (IHS):</b> Work with 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.</p>	<ul style="list-style-type: none"><li>• <b>Ongoing</b>—Parent release forms are included in the school registration packet each year. Most parents provided immunization records directly instead of signing the release form, but the option will remain available annually.</li><li>• <b>Ongoing</b>— It was previously noted that the collaboration between the principal and public health nurse to review immunizations would be a cancelled action step. However, collaboration between the principal and public health nurse continues to review immunizations because NASIS immunization review is not yet set up.</li></ul>
<p><b>Training on NASIS Data Entry:</b> 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).</p>	<ul style="list-style-type: none"><li>• <b>Not Started</b>—Principal will contact NASIS specialist by March 15, 2026, to schedule training for administrative staff. Training is expected to be completed by April 30, 2026.</li></ul>
<p><b>Data Entry and Record Maintenance:</b> Enter all current student immunization records into NASIS to ensure centralized, accessible, and up-to-date records.</p>	<ul style="list-style-type: none"><li>• <b>Not Started</b>—This action step is contingent on training for the school staff to utilize this system to monitor immunizations. However, records of the quarterly immunization review are maintained and signed by the public health nurse and principal.</li></ul>
<p><b>Ongoing Compliance Monitoring:</b> The Education Resource Center (ERC) will review immunization records during both the fall and spring ISEP review to verify compliance with immunization policies and procedures.</p>	<ul style="list-style-type: none"><li>• <b>Ongoing</b>—ERC monitors immunization records during fall and spring ISEP review and provides feedback. Students missing immunizations are flagged. The fall review is complete; the spring review is scheduled.</li></ul>

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

Legal Citation: 25 CFR §36.20(b)

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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
<p><b>Lesson Plan Documentation</b></p> <ul style="list-style-type: none"> <li>Continue using the current lesson plan template, which includes fields for documenting cultural integration and learning styles.</li> <li>Teachers will identify which learning styles are addressed and describe corresponding instructional activities.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>—All teachers continue using the lesson plan template to document integration of Native American culture across all subjects. Evidence of cultural integration in core subjects is being collected.</li> <li><b>On Track</b>—Learning style activities are documented and described in lesson plans.</li> </ul>
<p><b>Professional Development and Support</b></p> <ul style="list-style-type: none"> <li>Provide professional development to share resources for cultural integration.</li> <li>Offer examples and strategies to help teachers meaningfully incorporate culture into core content areas.</li> </ul>	<ul style="list-style-type: none"> <li><b>Ongoing</b>—Professional development is provided based on lesson plan reviews and walkthrough data. <ul style="list-style-type: none"> <li>A PD session on incorporating Native American curriculum into lesson plans was conducted by the ADD BOS Culture and Language Specialist on December 17, 2025.</li> </ul> </li> </ul>
<p><b>Monitoring and Feedback</b></p> <ul style="list-style-type: none"> <li>The principal will continue conducting regular classroom walkthroughs to observe implementation of cultural and learning style components.</li> <li>Feedback will be provided to teachers to support continuous improvement.</li> </ul>	<ul style="list-style-type: none"> <li><b>Ongoing</b>—The principal conducts regular classroom walkthroughs. In January, walkthroughs shifted from short visits to longer observations (20+ minutes) to verify alignment with lesson plans and cultural integration.</li> </ul>
<p><b>Tribal Collaboration and Curriculum Approval</b></p> <ul style="list-style-type: none"> <li>Maintain documentation of tribal approval for the culture and language curriculum currently in use.</li> <li>Develop a basic framework or guidance document to support teachers in integrating Native American culture across all subjects.</li> </ul>	<ul style="list-style-type: none"> <li><b>Completed</b>—Tribe approved the culture and language curriculum currently in use.</li> <li><b>In Progress</b>—Framework and cultural integration resources were shared with the HES School Board via email for feedback. Presentation scheduled for <b>March 2026</b> by the ADD BOS Native Language, Culture, and History Specialist.</li> </ul>
<p><b>Culture and Language Program Support</b></p> <ul style="list-style-type: none"> <li>Provide technical assistance to the culture and language teacher to support the development of lesson plans and basic assessment documentation.</li> </ul>	<ul style="list-style-type: none"> <li><b>Not Started</b>—Efforts to schedule technical assistance for the culture and language teacher have been initiated by the ADD BOS Native Language, Culture, and History Specialist. Due to limited availability on campus and scheduling conflicts, a meeting has not yet occurred. The specialist will continue working with the teacher to identify a mutually convenient time and ensure support for lesson plan documentation and assessment development.</li> </ul>
<p><b>Learning Style Data Utilization</b></p> <ul style="list-style-type: none"> <li>Teachers will continue administering and maintaining learning style inventories.</li> <li>Use this data to inform instructional planning and differentiation, as documented in lesson plans.</li> </ul>	<ul style="list-style-type: none"> <li><b>Completed</b>—Teachers administered a learning style assessment at the beginning of the school year. Data is maintained in teacher data files.</li> <li><b>Ongoing</b>—Data and related activities are documented in lesson plans.</li> </ul>



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

<p><b>Master Schedule Development</b></p> <ul style="list-style-type: none"><li>• 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 year through the end of the school year.</li></ul>	<ul style="list-style-type: none"><li>• <b>On Track</b>— HES continues to implement Genius Time for most intraschool programs. Students rotate daily through offerings such as Library, Leadership, STEAM, Art, Computers, Nutrition, Mindfulness, and Kindness. Genius Time provides inquiry-based, student-directed learning that supports extracurricular engagement, skill development, and mental well-being.</li><li>• <b>On Track</b>—Physical Education (PE) is scheduled four days per week. All students participate in PE class.</li></ul>
<p><b>Continuity of Instructional Services</b></p> <ul style="list-style-type: none"><li>• 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.</li></ul>	<ul style="list-style-type: none"><li>• <b>On Track</b>— HES has contingency plans to ensure uninterrupted intraschool programs during teacher absences. For example, when the PE teacher covered a classroom, the regular classroom teacher provided PE instruction using available curriculum and resources.</li><li>• <b>On Track</b>—All teachers have access to instructional materials to maintain program continuity.</li></ul>

## 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, Language and Culture)
- Class records: attendance, grade books, and Student Work Samples

Corrective Action	Status/Progress
<p><b>Instructional Planning:</b> Teachers will develop and submit weekly lesson plans using the designated template. These plans will document:</p> <ul style="list-style-type: none"> <li>• Alignment with 25 CFR § 36.21 requirements (e.g., language development, environmental exploration, psychomotor and social development, creativity, and health education).</li> <li>• Integration of curriculum materials and interdisciplinary content.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Ongoing</b>—The kindergarten teacher continues to use the designated lesson plan template to document lessons aligned with the selected curriculum, which meets the requirements of 25 CFR §36.21.</li> <li>• <b>On Track</b>—Students receive instruction in physical education, social-emotional learning, and health, as documented in lesson plans.</li> <li>• <b>In Progress</b>—Students receive Havasupai culture and language instruction weekly. Lesson plan documentation for this class is being developed.</li> <li>• <b>In Progress</b>—Schoology implementation is underway. Additional training and support are scheduled to support implementation: <ul style="list-style-type: none"> <li>○ February 11, 2026 – Site support visit</li> <li>○ March 23, 2026, and May 8, 2026 – Future training sessions</li> </ul> </li> </ul>
<p><b>School-Level Monitoring:</b> The school principal will:</p> <ul style="list-style-type: none"> <li>• Review lesson plans to verify alignment with regulatory standards.</li> <li>• Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>—The principal reviews lesson plans during walkthroughs to ensure alignment with instructional expectations.</li> <li>• <b>Ongoing</b>—Walkthroughs have transitioned from brief visits to extended observations (20+ minutes) to verify lesson plan fidelity and cultural integration.</li> </ul>
<p><b>Oversight and Support by ADD-BOS:</b> ADD-BOS staff will:</p> <ul style="list-style-type: none"> <li>• Monitor both teacher lesson plans and the principal’s documentation of reviews and walkthroughs.</li> <li>• Provide feedback and ensure that regulatory elements are consistently implemented and monitored.</li> <li>• The Curriculum, Instruction, &amp; Assessment Specialist will offer technical assistance and professional development as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—The Curriculum, Instruction, &amp; Assessment Specialist monitors lesson plans and walkthrough data monthly. She has developed a standardized checklist for consistency across Bureau-operated schools. This checklist will be used to guide lesson plan reviews by other BOS staff.</li> <li>• <b>On Track</b>—Feedback is provided to the principal based on walkthrough data and lesson plan reviews.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>On Track</b>—Individual teacher support continues, focusing on integrating required components into lesson plans.</li> </ul>
<p><b>Student Work Documentation:</b> Teachers will maintain portfolios of student work samples that demonstrate required instructional program outlined in 25 CFR § 36.21.</p>	<ul style="list-style-type: none"> <li>• <b>Ongoing</b>—Teachers continue to collect and maintain work samples. These are now uploaded to the school SharePoint site for regular review and will be examined during compliance site visits.</li> </ul>
<p><b>Curriculum Reflection and Review:</b> 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>	<p><b>Cancelled</b>—This action step has been discontinued because the intended purpose of strengthening instructional planning and monitoring has been effectively met through existing, more efficient practices already embedded in the school’s routines. Although teachers received training on curriculum map reflections, integrating this additional step into their workflow has proven challenging and has not yielded added value beyond what is already being captured through lesson plans and walkthrough observations. Because the practice is not necessary for demonstrating compliance, and would only strengthen, not establish, alignment if used, the decision has been made to discontinue the task for purposes of the formal work plan.</p>

## 25 CFR §36.22 - Standard VII - Elementary Instructional Program

Legal Citation: 25 CFR §36.22

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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 instruction in all areas
- Class records: attendance, grade books, student work samples, and/or walkthrough data

Corrective Action	Status/Progress
<p><b>Instructional Planning:</b> Teachers will develop and submit weekly lesson plans using the designated template. These plans will document:</p> <ul style="list-style-type: none"> <li>Clearly identify instruction in the six required subject areas: language arts, mathematics, social studies, science, fine arts, and physical education.</li> <li>Integrate the five mandated content areas: career awareness, environmental and safety education, health education, metric education, and computer literacy.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>—Teachers continue using the designated lesson plan template to document lessons aligned with the selected curriculum, which meets the requirements of 25 CFR §36.22.</li> <li><b>On Track</b>—Students receive physical education instruction four days per week from a certified PE teacher.</li> <li><b>On Track</b>—Integrated content areas are documented in lesson plans. The Curriculum, Instruction, &amp; Assessment Specialist reviews plans regularly and provides support to strengthen integration.</li> <li><b>On Track</b>—Students also engage in integrated areas through “Genius Time,” rotating daily through offerings such as Library, Career Awareness, STEAM, Art, Computers, Health, Nutrition, Mindfulness, and Kindness.</li> <li><b>In Progress</b>—Schoology implementation is underway. Currently, one teacher uses the platform to post assignments. Additional training and support are scheduled: <ul style="list-style-type: none"> <li>February 11, 2026 – Site support visit</li> <li>March 23, 2026, and May 8, 2026 – Future training sessions</li> </ul> </li> </ul>
<p><b>School-Level Monitoring:</b> The school principal will:</p> <ul style="list-style-type: none"> <li>Review lesson plans to verify alignment with regulatory standards.</li> <li>Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans.</li> </ul>	<ul style="list-style-type: none"> <li><b>In Progress</b>—The principal reviews lesson plans during walkthroughs to ensure instructional fidelity.</li> <li><b>Ongoing</b>—Walkthroughs have shifted from brief visits to extended observations (20+ minutes) to verify lesson plan alignment and cultural integration.</li> </ul>
<p><b>Oversight and Support by ADD-BOS:</b> ADD-BOS staff will:</p> <ul style="list-style-type: none"> <li>Monitor both teacher lesson plans and the principal’s documentation of reviews and walkthroughs.</li> <li>Provide feedback and ensure that regulatory elements are consistently implemented and monitored.</li> <li>The Curriculum, Instruction, Assessment Specialist will offer technical assistance and professional development as needed.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>—The Curriculum, Instruction, &amp; Assessment Specialist monitors lesson plans and walkthrough data monthly. She has developed a standardized checklist for consistency across Bureau-operated schools. This checklist will be used to guide lesson plan reviews by other BOS staff.</li> <li><b>On Track</b> – Feedback is provided to the principal based on walkthrough data and lesson plan reviews.</li> <li><b>On Track</b> – Individual teacher support continues, focusing on integrating required components into lesson plans.</li> </ul>
<p><b>Student Work Documentation:</b> Teachers will maintain portfolios of student work that demonstrate engagement with both the core subjects</p>	<ul style="list-style-type: none"> <li><b>Ongoing</b> – Teachers continue to collect and maintain work samples. These are now uploaded to the school SharePoint site for regular review</li> </ul>

<p>and integrated content areas. These portfolios will serve as evidence of instructional implementation and student learning.</p>	<p>and will be examined during compliance site visits.</p>
<p><b>Curriculum Reflection and Review:</b>          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>	<p><b>Cancelled</b>—This action step has been discontinued because the intended purpose of strengthening instructional planning and monitoring has been effectively met through existing, more efficient practices already embedded in the school’s routines. Although teachers received training on curriculum map reflections, integrating this additional step into their workflow has proven challenging and has not yielded added value beyond what is already being captured through lesson plans and walkthrough observations. Because the practice is not necessary for demonstrating compliance, and would only strengthen, not establish, alignment if used, the decision has been made to discontinue the task for purposes of the formal work plan.</p>

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

Legal Citation: 25 CFR §36.23

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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 in all areas.
- Class records: attendance, grade books, Student Work Samples, and/or walkthrough data

Corrective Action	Status/Progress
<p><b>Develop and Adopt a School Philosophy Statement</b></p> <ul style="list-style-type: none"> <li>• Create a clear, inclusive school philosophy that reflects the values, goals, and cultural identity of the Havasupai community.</li> <li>• Ensure the philosophy is informed by the needs assessment and is visibly embedded in instructional planning, school policies, and classroom practices</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>—A draft philosophy statement has been developed using the school’s vision, mission, values, and goals. <ul style="list-style-type: none"> <li>○ On February 25, 2026, the principal distributed a formal feedback form to multiple stakeholder groups to gather input on the draft philosophy. The form was emailed to the Tribal Council, School Board, and teachers.</li> <li>○ Students reviewed the philosophy during SEL lessons on February 25, 2026, and submitted their feedback through the provided form.</li> <li>○ To ensure broader community participation, printed feedback forms were also delivered to the Elderly Center, the community store, the café, and the Head Start program.</li> <li>○ The feedback form was attached to the school newsletter sent home with students on February 25, 2026.</li> <li>○ Once responses are returned, they will be collected, scanned, and uploaded to a SharePoint folder for review by BIE and for use in finalizing the school philosophy statement.</li> </ul> </li> </ul>
<p><b>Implement a Progressive Instructional Program</b></p> <ul style="list-style-type: none"> <li>• Ensure teachers consistently use the adopted curricula for Reading/Language Arts, Mathematics, Science, and Social Studies.</li> <li>• Align instruction across grade levels to support a progressive, developmentally appropriate continuum from elementary through middle school.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—Teachers continue to implement the selected curriculum as documented in lesson plans. The Savvas curriculum provides a progressive instructional program aligned with grade-level expectations and supports continuity across subjects.</li> </ul>
<p><b>Instructional Planning:</b> Teachers will develop and submit weekly lesson plans using the designated template. These plans will document:</p> <ul style="list-style-type: none"> <li>• Clearly identify instruction in the required subject areas: language arts, mathematics, social studies, science, fine and practical arts, computer literacy and physical education.</li> <li>• Integrate the mandated content areas: career exploration, environmental and safety education, metric education, consumer economics and health.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—Teachers continue using the designated lesson plan template to document lessons aligned with the selected curriculum, which meets the requirements of 25 CFR §36.22.</li> <li>• <b>On Track</b>—Students receive physical education instruction four days per week from a certified PE teacher.</li> <li>• <b>On Track</b>—Integrated content areas are documented in lesson plans. The Curriculum, Instruction, &amp; Assessment Specialist reviews plans regularly and provides support to strengthen integration.</li> <li>• <b>On Track</b>—Students also engage in integrated areas through “Genius Time,” rotating daily</li> </ul>

	<p>through offerings such as Library, Health, Career, STEAM, Art, Computers, Nutrition, Mindfulness, and Kindness.</p> <ul style="list-style-type: none"> <li>• <b>In Progress</b>—Schoology implementation is underway. Currently, one teacher uses the platform to post assignments. Additional training and support are scheduled: <ul style="list-style-type: none"> <li>○ February 11, 2026 – Site support visit</li> <li>○ March 23, 2026, and May 8, 2026 – Future training sessions</li> </ul> </li> </ul>
<p><b>School-Level Monitoring:</b> The school principal will:</p> <ul style="list-style-type: none"> <li>• Review lesson plans to verify alignment with regulatory standards.</li> <li>• Conduct regular classroom walkthroughs and formal observations to ensure instructional fidelity and adherence to submitted plans.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>—The principal reviews lesson plans during walkthroughs to ensure instructional fidelity.</li> <li>• <b>Ongoing</b>—Walkthroughs have shifted from brief visits to extended observations (20+ minutes) to verify lesson plan alignment and cultural integration.</li> </ul>
<p><b>Oversight and Support by ADD-BOS:</b> ADD-BOS staff will:</p> <ul style="list-style-type: none"> <li>• Monitor both teacher lesson plans and the principal’s documentation of reviews and walkthroughs.</li> <li>• Provide feedback and ensure that regulatory elements are consistently implemented and monitored.</li> <li>• The Curriculum, Instruction, &amp; Assessment Specialist will offer technical assistance and professional development as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—The Curriculum, Instruction, &amp; Assessment Specialist monitors lesson plans and walkthrough data monthly. She has developed a standardized checklist for consistency across Bureau-operated schools. This checklist will be used to guide lesson plan reviews by other BOS staff.</li> <li>• <b>On Track</b>— Feedback is provided to the principal based on walkthrough data and lesson plan reviews.</li> <li>• <b>On Track</b>— Individual teacher support continues, focusing on integrating required components into lesson plans.</li> </ul>
<p><b>Student Work Documentation:</b> 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"> <li>• <b>Ongoing</b>— Teachers continue to collect and maintain work samples. These are now uploaded to the school SharePoint site for regular review and will be examined during compliance site visits.</li> </ul>
<p><b>Curriculum Reflection and Review:</b> 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>	<p><b>Cancelled</b>—This action step has been discontinued because the intended purpose of strengthening instructional planning and monitoring has been effectively met through existing, more efficient practices already embedded in the school’s routines. Although teachers received training on curriculum map reflections, integrating this additional step into their workflow has proven challenging and has not yielded added value beyond what is already being captured through lesson plans and</p>

	<p>walkthrough observations. Because the practice is not necessary for demonstrating compliance, and would only strengthen, not establish, alignment if used, the decision has been made to discontinue the task for purposes of the formal work plan.</p>
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## 25 CFR §36.30, Standard X - Grading Requirements

Legal Citation: 25 CFR §36.30

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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
<p><b>Uniform Grading System Implementation</b></p> <ul style="list-style-type: none"> <li>Continue using the updated grading policy aligned with BIE’s uniform grading system and mastery-based criteria, as documented in the school handbook.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>– The updated grading policy has been incorporated into the student handbook as an addendum and meets the requirements of 25 CFR §36.30. The policy is actively implemented and monitored for consistency.</li> </ul>
<p><b>Lesson Planning and Instructional Adjustments</b></p> <ul style="list-style-type: none"> <li>Teachers will use the current lesson plan template, which includes a section for data use and reteaching strategies based on formative and summative assessments.</li> <li>Provide targeted support and coaching to teachers to strengthen their use of data to inform instruction.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>– The lesson plan template includes a designated section for instructional adjustments based on student data.</li> <li><b>On Track</b>– The Curriculum, Instruction, &amp; Assessment Specialist reviews lesson plans regularly to ensure compliance with regulatory requirements and provides individualized technical assistance to teachers.</li> <li><b>On Track</b>– Teachers maintain organized files of student data, assessments, and work samples. Data is also uploaded to the school’s SharePoint site for accessibility and monitoring.</li> <li><b>Ongoing</b>– Professional development sessions have been conducted to strengthen assessment and instructional practices: <ul style="list-style-type: none"> <li>January 14, 2026-I-Ready Assessment Middle of Year (MOY) protocols.</li> <li>January 27, 2026-Analyzing Behavior Management Data</li> <li>January 30, 2026-I-Ready MOY Test results</li> </ul> </li> </ul>
<p><b>Parent and Student Communication</b></p> <ul style="list-style-type: none"> <li>Provide parents with NASIS access to monitor student progress.</li> </ul>	<ul style="list-style-type: none"> <li><b>Complete</b>– Parents have active NASIS access, enabling them to monitor student progress throughout the school year.</li> </ul>
<p><b>Parent-Teacher and Student Conferences</b></p> <ul style="list-style-type: none"> <li>Hold parent-teacher conferences in both fall and spring.</li> <li>Document attendance and outcomes of conferences.</li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>– Spring parent-teacher conferences are scheduled for March 20, 2026. The school uses multiple communication strategies, including the Remind App, and offers virtual conference options to increase participation.</li> <li><b>On Track</b>– Attendance is addressed during conferences and documented on report cards signed by parents. Additionally, meetings are being scheduled with families of students with attendance concerns to develop action plans. Attendance data is reviewed during weekly PLC/Data meetings.</li> </ul>
<p><b>Report Card Distribution and Documentation</b></p> <ul style="list-style-type: none"> <li>Issue report cards at least four times per year, ensuring they include: <ul style="list-style-type: none"> <li>Recommendations and probable promotion status</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><b>On Track</b>– Report cards for the first and second quarters included probable promotion status, attendance, and signature lines. Both teachers and parents signed report cards.</li> </ul>

<ul style="list-style-type: none"><li>○ Attendance records</li><li>○ Signature lines and return requests</li><li>• When parents do not attend conferences, send report cards home with students and request signed return slips for inclusion in cumulative records.</li></ul>	<ul style="list-style-type: none"><li>• <b>On Track</b>– Report cards were sent home when conferences were not attended, and the school offered incentives for students to return signed copies for inclusion in cumulative records.</li></ul>
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## 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
<p><b>Maintain and Review the Approved Promotion Policy</b></p> <ul style="list-style-type: none"> <li>• Continue implementation of the approved promotion policy, which includes mastery-based criteria and attendance requirements.</li> <li>• Review the policy annually to ensure continued alignment with 25 CFR § 36.31 and update as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—The promotion policy is approved by the EPA and meets the criteria in this regulation. The policy has been added to the handbook as an addendum.</li> <li>• <b>Not started</b>— Policies and handbooks will undergo comprehensive review during the summer to ensure continued compliance and alignment with federal regulations.</li> </ul>
<p><b>Use of Criterion-Referenced Assessments</b></p> <ul style="list-style-type: none"> <li>• Teachers will use criterion-referenced tests aligned to grade-level standards to evaluate student mastery of instructional objectives.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>—Teachers are consistently using criterion-referenced assessments embedded in the Savvas curriculum to measure mastery of grade-level standards and lesson objectives. Assessment practices are monitored during compliance site visits to ensure fidelity.</li> </ul>
<p><b>Promotion Review Committee Process</b></p> <ul style="list-style-type: none"> <li>• The Student Success Team will review promotion decisions for students who do not meet attendance or academic criteria.</li> <li>• Ensure that any overrides or appeals are documented in writing and reviewed by the EPA, as required.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>—Meetings with families of students at risk of non-promotion due to attendance have begun. Action plans are being developed collaboratively to support student success.</li> <li>• <b>On Track</b>—Student Success Team meetings to review promotion decisions for students who do not meet established criteria are scheduled for April 8.</li> </ul>

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

Legal Citation: 25 CFR §36.40

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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
<p><b>Finalize Library Instructional Objectives Document</b></p> <ul style="list-style-type: none"> <li>• Complete and adopt the library/media program’s instructional and service objectives, ensuring alignment with the school’s SMART goals, philosophy, and community needs.</li> <li>• Schedule an annual evaluation of these objectives by the principal and designated library lead at the end of each school year.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>– The library handbook has been developed and includes instructional, and service objectives aligned with the school’s SMART goals and regulatory requirements under 25 CFR §36.40.</li> <li>• <b>In Progress</b>–A draft philosophy statement has been developed using the school’s vision, mission, values, and goals. <ul style="list-style-type: none"> <li>○ On February 25, 2026, the principal distributed a formal feedback form to multiple stakeholder groups to gather input on the draft philosophy. The form was emailed to the Tribal Council and School Board, and teachers received copies to provide their individual feedback.</li> <li>○ Students reviewed the philosophy during SEL lessons on February 25, 2026, and submitted their feedback through the provided form.</li> <li>○ To ensure broader community participation, printed feedback forms were also delivered to the Elderly Center, the community store, the café, and the Head Start program.</li> <li>○ The feedback form was attached to the school newsletter sent home with students on February 25, 2026.</li> </ul> </li> <li>• Once responses are returned, they will be collected, scanned, and uploaded to a designated SharePoint folder for review by BIE and for use in finalizing the school philosophy statement.</li> <li>• <b>Deferred</b>– The annual evaluation of instructional and service objectives will be conducted through the comprehensive needs assessment as part of the BIE One Plan process at the end of the school year.</li> </ul>
<p><b>Establish the Library Committee</b></p> <ul style="list-style-type: none"> <li>• Formally establish the Library Committee, as outlined in the Library Handbook.</li> <li>• Ensure the committee includes staff, students, and community representation.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>–The Library Committee has been identified and includes two teachers, the student council president and vice president, the principal, and the school board. This composition ensures representation from staff, students, and the community as outlined in the Library Handbook.</li> <li>• <b>Ongoing</b>–Data collected from students, parents, and staff during the development of the handbook continues to inform committee priorities and decisions.</li> </ul>

<p><b>Approve Library Policy and Selection Guidelines</b></p> <ul style="list-style-type: none"> <li>Finalize the draft policy for the selection of materials and equipment.</li> <li>Present the policy to the school board for review and approval, incorporating feedback as needed.</li> </ul>	<ul style="list-style-type: none"> <li><b>Complete</b>—The selection policy is finalized and included in the library handbook. It was presented to the school board and emailed for review.</li> <li><b>Complete</b>— The school board held a special meeting on March 4, 2026. During this meeting they voted to approve the library handbook including the policy for the selection of materials and equipment.</li> </ul>
<p><b>Maintain and Expand the Library Collection</b></p> <ul style="list-style-type: none"> <li>Continue cataloging and inventorying books using the Little Library System.</li> <li>Ensure the collection meets ADM-based book ratios</li> </ul>	<ul style="list-style-type: none"> <li><b>In Progress</b>—A plan is being refined to have staff members who will be on-site at HES during the summer work on cataloging the books and adding detailed information in the Little Library System. This will support compliance with ADM-based book ratios and improve accessibility of the collection.</li> </ul>
<p><b>Library Access and Scheduling</b></p> <ul style="list-style-type: none"> <li>Add library time to the school’s master schedule once staff training is completed.</li> <li>Ensure all students and teachers are entered into the library system and can check out materials during scheduled times.</li> </ul>	<ul style="list-style-type: none"> <li><b>Complete</b>—Library is on the school’s master schedule, and student receive library services during genius time.</li> <li><b>Complete</b>—Student and teachers are entered into the Little Library System and can check out books during their scheduled library time.</li> </ul>
<p><b>Staffing and Interim Support</b></p> <ul style="list-style-type: none"> <li>Train designated teaching staff to facilitate library specials.</li> <li>Utilize community volunteers to support library operations and events.</li> </ul>	<ul style="list-style-type: none"> <li><b>Complete</b>— A certified teacher has been assigned to the library specials class and trained on using the Little Library System. All teachers have also received training on the system.</li> <li><b>In Progress</b>— A background cleared community volunteer has been contacted, and discussions have begun to define the scope of her role in supporting library operations and events. Planning is underway to ensure her contributions align with library needs and compliance requirements.</li> </ul>

## 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
<p><b>Establish the Textbook Review Committee</b></p> <ul style="list-style-type: none"> <li>• Form a leadership team composed of school staff to manage the textbook review committee and process.</li> <li>• Recruit and develop a parent, school board, and student panel to advise the leadership team and participate in the review process.</li> <li>• Collaborate with the facilitator to enlist parent participants and ensure community representation.</li> <li>• Submit the full committee membership list, including roles and affiliations, to the school board for formal approval.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Complete</b>— The textbook committee has been identified and will include two teachers, the student council president and vice president, the school counselor, the principal, and the school board. This composition ensures representation from staff, students, and the community.</li> <li>• <b>Complete</b>—The Committee was presented to the school board for approval at a special meeting on March 4<sup>th</sup>. The school board approved the committee.</li> </ul>
<p><b>Develop Review Procedures and Criteria</b></p> <ul style="list-style-type: none"> <li>• Collaborate with the ADD-BOS Curriculum, Instruction, &amp; Assessment Specialist and utilize resources from the WestEd curriculum team to develop:             <ul style="list-style-type: none"> <li>• A written textbook review procedure</li> <li>• Clear criteria for evaluating instructional materials                 <ul style="list-style-type: none"> <li>• Textbooks shall meet course objectives</li> <li>• Reflect cultures accurately</li> <li>• Be in good physical condition and varied in reading levels</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>— The Textbook Review Standard Operating Procedure was presented to the school board on January 20, 2026.</li> <li>• <b>On Track</b>— The textbook review procedure and criteria are being refined to ensure clarity and accessibility. The review will occur annually at the end of the school year as part of planning for the following year. Integration into the BIE One Plan process and community feedback mechanisms are in progress.</li> <li>• <b>Ongoing</b>— A team of education specialists is developing a process to make the review accessible and user-friendly for students and community members. The goal is to integrate this process into the end-of-year survey distributed to students, staff, community, and school board.</li> </ul>

## 25 CFR §36.42, Standard XV - Counseling Services

Legal Citation: 25 CFR §36.42

February 2025 Annual Report Finding

### Evidence Required for Compliance

- 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
<p><b>Develop a Counseling Program Plan</b></p> <ul style="list-style-type: none"> <li>• Create a written counseling program plan that outlines services in the physical, social, emotional, intellectual, and vocational domains.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>— The counseling handbook is being used to guide program implementation. It includes services across physical, social-emotional, academic, and vocational domains. The philosophy section is still being finalized and will be incorporated once complete.</li> </ul>
<p><b>Establish Counselor Schedule and Documentation System</b></p> <ul style="list-style-type: none"> <li>• Develop a counselor schedule that reflects time for individual, group, and preventative services.</li> <li>• Maintain service logs and/or student support documentation to track delivery and impact.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>In Progress</b>— The counselor’s schedule provides two hours daily for individual counseling and time for classroom push-ins to deliver SEL lessons. Group counseling time is limited, and leadership is reviewing time-on-task documents to adjust the schedule for regulatory compliance.</li> <li>• <b>Ongoing</b>— The counselor maintains a log of students served and lesson plans for SEL sessions. Logs and documentation are reviewed during compliance site visits.</li> </ul>
<p><b>Ensure Cultural Relevance and Community Input</b></p> <ul style="list-style-type: none"> <li>• Collaborate with tribal representatives and the culture teacher to ensure counseling services reflect community values and cultural sensitivity.</li> <li>• Document tribal concurrence and cultural integration efforts.</li> <li>• Utilize first-person, tribally informed resources to support cultural competency for current and future counselors.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>— To support this effort, two guiding resources have been adopted for counselor use and onboarding: <ul style="list-style-type: none"> <li>○ <b>HES Career and High School Transition Plan</b> (developed by the school counselor) which incorporates culturally grounded supports for academic, career, emotional, and transition readiness.</li> <li>○ <b>Information Resources for Educators at Havasupai Elementary School</b> (WestEd and tribal-review supported list) – a curated, first-person resource set providing contemporary Havasupai voices, cultural context, and community expectations for educators.</li> </ul> </li> <li>• These resources will guide: <ul style="list-style-type: none"> <li>○ counseling lesson development,</li> <li>○ individual academic and career planning,</li> <li>○ cultural awareness training for incoming counselors, and</li> <li>○ documentation procedures grounded in cultural values.</li> </ul> </li> <li>• <b>Discontinued</b>— Although obtaining documented tribal concurrence is not a regulatory requirement, HES will continue to use resources reviewed by a Havasupai community member to ensure cultural accuracy and appropriateness. These materials will be maintained in a SharePoint folder for counselor onboarding and reference.</li> </ul>

<p><b>Maintain Confidentiality and Security</b></p> <ul style="list-style-type: none"> <li>• Secure a locking file cabinet and private workspace for counseling records.</li> <li>• Develop and implement confidentiality procedures in collaboration with the ADD-BOS Behavioral Health Specialist.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Complete</b>—The counselor has a locking file cabinet in a secure location.</li> <li>• <b>Complete</b>— Confidentiality procedures are outlined in the counseling handbook.</li> </ul>
<p><b>Support Academic and Career Planning</b></p> <ul style="list-style-type: none"> <li>• Schedule academic counseling for middle school students twice yearly.</li> <li>• Use career interest inventories to inform written academic and career plans.</li> <li>• Track student transitions to high school with a transition plan or tracker.</li> <li>• Schedule events to inform students and families of options for boarding schools.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>— Career interest inventories have been completed for all middle school students: <ul style="list-style-type: none"> <li>○ 8th Grade: 8/8 students completed</li> <li>○ 7th Grade: 5/5 students completed</li> <li>○ 6th Grade: 5/6 students completed</li> </ul> </li> <li>• <b>In Progress</b>— Academic counseling sessions are underway: <ul style="list-style-type: none"> <li>○ 8th Grade: 8/8 students completed</li> <li>○ 7th Grade: 3/5 students completed</li> <li>○ 6th Grade: 2/6 students completed</li> <li>○ Remaining students will be prioritized as they return to school from absences.</li> </ul> </li> <li>• <b>Ongoing</b>— Transition tracking for high school will begin in the spring.</li> <li>• <b>On Track</b>— Students participated in a virtual Q &amp; A with Riverside Indian School on February 12, 2026, led by Havasupai students currently enrolled there. Planning is in progress to schedule similar virtual tours with Chemawa Indian School and Sherman Indian High School.</li> </ul>

## 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
<p><b>Develop and Approve the Schoolwide Activity Plan</b></p> <ul style="list-style-type: none"> <li>• Incorporate the 21<sup>st</sup> Century Grant activities to the requirements of 25 CFR § 36.43 schoolwide activity plan.</li> <li>• Compile a Schoolwide Activity Plan that includes student activities, objectives, and alignment with student needs.</li> <li>• Submit the activity plan to the school board and school supervisor for approval.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completed</b>— A schoolwide activity plan has been created and maps 21<sup>st</sup> Century program components to the requirements of this regulation.</li> <li>• <b>Complete</b>— The plan was presented to the school board in November and emailed for review. The school board held a special meeting on March 4, 2026, and approved the schoolwide activity plan.</li> <li>• <b>On Track</b>— Activities began the week of February 17, 2026, and include: <ul style="list-style-type: none"> <li>○ Adventure, Endurance &amp; Recreation Club</li> <li>○ Supai Chefs (Cooking Club)</li> <li>○ Tutoring</li> <li>○ Lego STEAM Club</li> <li>○ Chicken Husbandry</li> <li>○ Sports Club</li> <li>○ Basketball</li> <li>○ Coding Club</li> <li>○ Yearbook/Photography</li> <li>○ Hydroponics</li> </ul> </li> </ul>
<p><b>Sponsor Assignment and Training</b></p> <ul style="list-style-type: none"> <li>• Assign qualified staff sponsors to each activity.</li> <li>• Maintain a roster of sponsors with their school roles and assigned activities.</li> <li>• Provide orientation and training to sponsors, including expectations, safety protocols, and documentation procedures.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>On Track</b>— Staff sponsors have been assigned to activities, and training was provided on expectations for sponsoring after-school programs, including safety and supervision protocols.</li> </ul>

**Safety and Compliance Protocols**

- Include event safety protocols and student supervision guidelines in the staff handbook.
- Ensure all student activities are school-sanctioned and follow established procedures.

- **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
<p><b>Participate in Scheduled Monitoring Visit</b></p> <ul style="list-style-type: none"> <li>• Prepare for the upcoming onsite monitoring scheduled for the week of January 12, 2026, coordinated by the BIE’s Chief Performance Office (CPO).</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completed</b>—The CPO coordinated an Onsite Fiscal and Programmatic monitoring visit the week of January 12, 2026. During this visit they reviewed programs for compliance with federal statutes and regulations. Regulations in Part 36 were a part of this review. The school will continue to be monitored on a 3-year cycle.</li> </ul>
<p><b>Final Monitoring Report and Technical Assistance Plan</b></p> <ul style="list-style-type: none"> <li>• The school and Education Resource Center (ERC) will receive a written monitoring report and technical assistance plan within 30 days.</li> <li>• Maintain documentation of follow-up actions and resolution of findings.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completed</b> – The Final Monitoring Report and Technical Assistance Plan were shared with school leadership, the School Board, and the Havasupai Tribe on February 25, 2026.</li> <li>• <b>In Progress</b>—Documentation of follow-up actions and resolution of findings will be maintained and uploaded to SharePoint for ongoing monitoring and future review. The official corrective actions will be submitted to the BIE Chief Performance Office and closed once requirements are met.</li> </ul>
<p><b>School Board and Stakeholder Engagement</b></p> <ul style="list-style-type: none"> <li>• BIE will invite the school board to participate in the monitoring process, including interviews and the exit meeting.</li> <li>• BIE will provide the HES school board with a written report.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completed</b>—The School Board was invited to participate in the monitoring process through onsite interviews.</li> <li>• <b>Completed</b> – The School Board received the Final Monitoring Report and Technical Assistance Plan on February 25, 2026, concurrent with distribution to school leadership and tribal stakeholders.</li> </ul>

<p><b>Annual Policy Evaluation Requirement</b></p> <ul style="list-style-type: none"> <li>• Continue collaboration with WestEd and the BIE Chief Performance Office to conduct a summative evaluation of BIE policies and administrative procedures.</li> <li>• Submit the final evaluation report to the BIE Director.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Complete</b>—BIE CPO and WestEd collaborated to complete a summative evaluation of BIE policies and procedures. The review focuses on identifying barriers to school compliance and recommending improvements.</li> <li>• <b>In Progress</b>—The final report is being prepared for submission to the Director.</li> </ul>
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## Appendix

### 2025-2026 HES Compliance Timeline and Activities

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 <a href="https://www.bie.edu/HavasupaiElementarySchool">Havasupai Elementary School   Bureau of Indian Education (bie.edu)</a>	Compliance Specialist, BIE, and Communications Director, BIE
June 10, 2025 September 8, 2025 December 5, 2025 March 5, 2026	Issue 90-day update written work plan	Compliance Specialist, BIE
June 19, 2025 September 17, 2025 December 16, 2025 March 16, 2026	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 April 3, 2026	Post 90-day work plan at <a href="https://www.bie.edu/HavasupaiElementarySchool">Havasupai Elementary School   Bureau of Indian Education (bie.edu)</a>	Compliance Specialist, BIE, and Communications Director, BIE
June 4, 2026	Issue the annual report on the status of BIE's compliance with 13 regulations at issue	Compliance Specialist, BIE
June 9, 2026	Copy of annual report provided to Assistant Secretary-Indian Affairs and BIE Director	Compliance Specialist, BIE and Management Analyst, BIE
June 15, 2026	Copy of annual report provided to Facilitator, Plaintiffs, and Tribal Council.	Compliance Specialist, BIE; Solicitor, BIE; and Education Program Administrator, BIE
July 6, 2026	Post the annual report at <a href="https://www.bie.edu/HavasupaiElementarySchool">Havasupai Elementary School   Bureau of Indian Education (bie.edu)</a>	Compliance Specialist, BIE, and BIE Communications Director

## 2025 HES Annual Compliance Assessment Summary

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](#).

<b>25 CFR § 36.11, Standard II for Administrative Requirements falls under Subpart B – Educational Management.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	

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

<b>25 CFR § 36.21, Standard VI - Kindergarten Instructional Program falls under Subpart C – Minimum Program of Instruction.</b>
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	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	

<b>25 CFR § 36.22, Standard VII – Elementary Instructional Program falls under Subpart C – Minimum Program of Instruction.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	

<b>25 CFR § 36.23, Standard VIII – Junior High/Middle School Instructional Program falls under Subpart C – Minimum Program of Instruction.</b>
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	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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.**

	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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		

<b>25 CFR § 36.31, Standard XI – Student Promotion Requirements falls under Subpart D – Student Instruction Evaluation.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	

<b>25 CFR § 36.40, Standard XIII – Library/media program falls under Subpart E – Instructional Support.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	
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**25 CFR § 36.41, Standard XIV – Textbooks falls under Subpart E – Instructional Support.**

	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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.**

	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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

<b>25 CFR § 36.43, Standard XVI – Student Activities falls under Subpart E – Instructional Support.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	

<b>25 CFR § 36.50, Standard XVII – School Program evaluation and needs assessment falls under Subpart F – Evaluation of Educational Standards.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§ 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		

<b>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.</b>			
	<b>Requirement Met</b>	<b>Non-Compliance</b>	<b>Not Applicable</b>
§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	