

# Ensuring Equitable Access to Excellent Education

Report by the Bureau of Indian Education – Phase 1 Submission

# March 18, 2016

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## **Introduction:**

The Bureau of Indian Education (BIE) is embarking on the first submission of its report to ensure our American Indian students receive equitable access to an excellent education. The report comes at a very prime moment with a bureau-wide reform underway. The reform is based on the American Indian Education Study Group's Blueprint for Reform's recommendation. The study group, formed by Secretary of Interior Sally Jewell and Secretary of Education Arne Duncan, identified five primary reform areas. One reform goal is targeted towards:

**Highly Effective Teachers and Principals** – Help tribes to identify, recruit, develop, retain, and empower diverse, highly effective teachers and principals to maximize the highest achievement for every student in all BIE-funded schools.

The Teacher Equity Plan will assist the BIE in defining the meaning and measures of providing all students equitable access to effective teachers. Our vision is that every student will be supported by ahighly effective teacher. This definition will encounter varied interpretations but the BIE intends to roll out a full scale stakeholder discussion to define the meaning of an effective teacher.

Currently, this first submission is focused on the requirements of the law and references an expansive literature review conducted by the BIE. As noted in Graph 1, the BIE schools occupy space in 23 different states and comply with definitions of highly qualified defined by each state. To capture the diverse definitions of these states, BIE conducted a content analysis of 25 states to select definitions that closely resembled the structure of the BIE. In the course of developing its Teacher Equity Plan, BIE performed a literature review examining seven state plans in great depth and more broadly analyzing the definitions utilized by twenty-three states where BIE schools are located (as well as the states of Hawaii and Alaska). The raw data from these analyses is provided in an appendix.

Across these twenty-five state plans analyzed by BIE, certain teacher and student variables were discussed in nearly every single state's plan. These are the five key variables originally statutorily required by No Child Left Behind: inexperienced teacher, unqualified teacher, out-of-field teacher, poor student, and minority student. States may define these variables at their own discretion, but there are prominent trends across the twenty-five state plans analyzed by BIE described in more detail in the Appendix. The goal of this literature review was for the BIE to understand how much flexibility could be captured in the definitions. Twenty-five state plans differed more in the additional variables they chose in analyzing equitable access to excellent educators across the BIE system.

## <u>Teacher Variables</u>

There were a variety of additional teacher variables that states either used to analyze their distribution of teachers or proposed using in the future once they had obtained the data to do so. These variables include the following:

- o Teacher newness to district
- O Teacher completion of preparation program
- o Teacher effectiveness (using value-added model with student achievement data)
- o Teacher attendance rate/absenteeism
- Teacher salary
- Teacher evaluation ratings
- Teacher turnover and mobility
- o Teacher vacancy rates
- Long-term substitute teachers
- Student-teacher ratio

Of these additional variables, some of the more common ones cited by the twenty-five states reviewed were teacher attendance rate, teacher salary, teacher turnover, and teacher effectiveness.

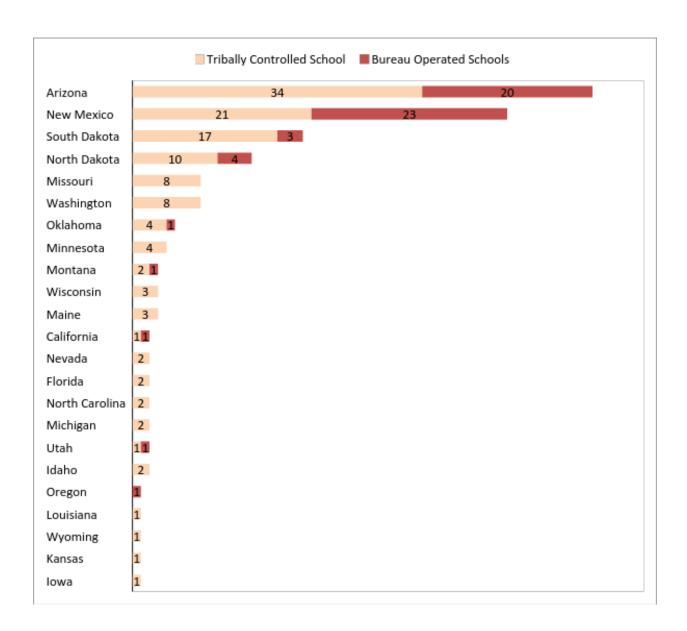
#### Student Variables

There were also a variety of additional student variables that states either used to analyze their distribution of teachers among student groups or proposed using in the future once they had obtained the data to do so. These variables include the following:

- Geographic locale (rural/urban/suburban/town/etc.)
- o School and/or student achievement
- o Population density
- Isolated small schools
- Special education status
- o Limited English Proficiency status
- o Homelessness
- Foster care
- o Tribal areas
- Migrant agricultural stream
- o Charter schools
- o Size of district
- o Size of school

Of these additional variables, some of the more common ones cited by the twenty-five states reviewed were geographic locale, student achievement, special education status, and LEP status. Clearly, no state has schools that have the distance between each school system. Therefore, creating any uniform definition will always be considered suspect by our stakeholders. We conducted a large

| scale literature review in order to make the most informed guess on which definitions and measures would help us detect the gaps in our schools systems. |
|--|
|  |
| Graph 1: Distribution of Bureau of Indian Education Schools by States  |
|  |
|  |



The vast number of states and the wide distribution of schools within these states create a host of varied challenges to the primary definitions and data collection for the first preliminary analysis. This first submission is only a shadow of the realities of BIE's effort to ensure equitable distribution across our school systems. We expect that with each submission under Phase 2 and 3, there will be a more accurate depiction of our teachers, students, and schools. This will create more realistic understandings of how to create a realistic look at strategies to address the equitable distribution of effective teachers.

At the moment, the BIE has accepted that highly effective is defined by experienced, qualified and infield teachers based on the most readily available data sets provided by our data systems. At the conclusion of the BIE stakeholder engagement sessions in Phase 2 and 3, we expect that the definition will change to meet the distinctive characteristics that capture the definition of a highly effective teacher. Although we recognize that BIE has many distinctive challenges from other State Education Agencies and Local Education Agencies, we are hopeful that we will provide our students with the most effective and culturally aware teachers. We believe that culturally aware teachers provide the added support to students coming from unique tribal communities.

#### Overview of the Report

This report targets five primary definitions and a preliminary analysis of aligned data points. Under this first submission, each table presented will provide an overall view of BIE and then, the two unique school systems, bureau operated schools and tribally controlled schools Nearly two-thirds of the Bureau of Indian Education schools are 127 tribally controlled school systems, similar to local public school districts, operating under the oversight of local tribal school boards. One-third of BIE's schools are operated and managed by the Bureau of Indian Education totaling 56 schools. The Navajo Nation retains both two school types and are organized based on their geography. The Navajo Nation has articulated their desire to take control of all sixty-six school systems and therefore, BIE continues to retain them under a separate division.

In the body of this preliminary submission is a cursory review of all data available from the Native American Student Information System operated by the BIE Data Program and the Federal Personal Payment System (FPPS) operated by the BIA Human Resources Department.

## **Definitions:**

The definitions provided in this section are only temporary until the BIE acquires stakeholder input on the definitions. The BIE conducted a literature review of 25 states to capture the best definition that used data that was readily available. We understood the need to begin an analysis based on these preliminary definitions to begin the conversation among our Associate Deputy Directors and Senior Program Managers. This would permit the BIE to consider how other states have proceeded with their analysis but also to see how the standard definitions do not easily transfer to the Bureau of Indian Education's unique educational landscape.

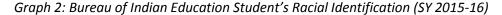
Beginning in December 2015, the BIE has coordinated weekly meetings with BIE's Associate Deputy Directors (ADDs), Human Resource Staff, and senior program managers to discuss the formulation of these preliminary definitions. We have preliminarily accepted these definitions as a starting point but have articulated the need to identify precise definitions with BIE principals and tribal stakeholders. Our stakeholder engagement is articulated in the later sections.

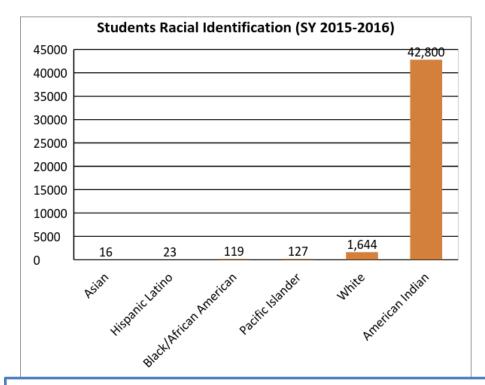
The *preliminary* definitions we have accepted is the following:

- Inexperienced Teacher A teacher with less than three years of teaching experience (i.e. teacher with two years of teaching or less).
- Unqualified Teacher A teacher identified as emergency, provisional or temporary status.
- Out-of-Field Teacher A teacher that teaches in a core academic subject or a grade for which the teacher does not meet the No Child Left Behind (NCLB) definition of highly qualified. Includes teaching without a major, with only a minor in the subject taught or without any endorsement.
- Poor Student A student that is eligible for United States Department of Agriculture (USDA)'s Free and Reduced Lunch Program.
- Rural Student A student attending schools located in isolated areas as measured by four indicators. These indicators were discussed with senior leadership that highlighted metrics that captured the usual concerns related to these:
  - Population density of school location,

- Distance of school to closest urban center,
- Closest housing availability to school,
- Distance to Walmart from school (this variable will change in second write-up)

During the past Senior Leadership meeting with the Associate Deputy Directors (ADDs) on January 22, 2016, we provided a breakdown of minority student within the BIE schools depicted in Graph 2. BIE identified minority as a very challenging indicator because of the make-up of our existing students. Its very difficult to identify sub-groups from a majority minority student population. Ninety-nine percent of BIE's student population is American Indian depicted in Graph 2. The few non-American Indian students are teacher's children or are students that have identified two races. BIE's senior staff determined that schools cannot be organized by a High or Low percentile of minority students since BIE is majority minority.





According to NASIS, there are 175 schools reporting student's racial category for SY 2015-2016. There are 1,753 students reporting multi-racial

The BIE team determined that this was not a useful organizing measure of our students. The leadership proposed alternatives such as tribal affiliation. We reviewed the make-up of our existing American Indian student population in SY 2014-2015 and found that there are over 350 tribal affiliations of students. We recognized that the creation of sub-groups of tribal affiliation would create the perception that American Indian students from certain tribes receive differing treatment from other tribes. We did not believe this to be an accurate depiction of the challenges confronting American Indian students attending Bureau of Indian Education schools.

A second alternative was the level of ruralness students encountered due to uncontrolled and situational circumstances out of the control of students. We discussed how ruralness and isolation factors impact student's access to effective teachers. The BIE determined that a set of rural indicators would explain challenges to students that prevent equitable access to highly effective teachers. We accepted the second alternative as a more accurate depiction of the challenges confronting American Indian students.

For the sake of this preliminary submission, we developed with our consultants a listing of indicators and organized these approximations based on google maps. We will continue to refine the rural indicators as we proceed.

#### Data Collection Challenges:

The Teacher Equity Plan submission reflects our best effort to collect data to measure the five primary data points. The data collection systems we utilize were extracted from the Department of Interior's Federal Employee data base and the BIE's Native American Student Information System. Our dependency upon the NASIS program to provide points comes with some challenges. We provided data that requires a systemic revision to addressing areas of high concern.

Alongside our stakeholder engagement calendar, we have devised a data collection revision to our existing Native American Student Information System (NASIS) to address these concerns. The data collection work plan is detailed in the appendix.

Challenge 1: Nearly two-third of BIE schools does not enter teacher data points to adequately capture our definitions.

The BIE currently does not mandate or require Tribally Controlled Schools to enter information for existing student and teacher measures identified in this preliminary submission. The data points are available within the student information system such as items like tenure, certifications, subjects, teacher education backgrounds. What is made available is done on a voluntary basis. Therefore, our data that is presented is based on the submission of those schools that have voluntarily entered the data into NASIS. To resolve this challenge, the BIE is working closely with NASIS to clarify confusing

terms like "tenure", "highly qualified teacher" and to require fields that need attention. Also, NASIS will actively include these teacher points into their training to schools.

Challenge 2: Using School Year 2014-2015 Data to Create a First Review of our definitions.

The BIE is relying upon data from two years ago. This is the best data set available that is available to capture the five areas identified in the definitions section.

Challenge 3: Data Entered is Not Typically Provided by Teachers.

The BIE cannot verify if the data entered into the cells defined by the Native American Student Information System are equally understood. There is no active training by NASIS to educate staff and teachers on the meaning of Out of Field, Unqualified, or Inexperienced Teachers. The data collected is based on the best guess of our ADDs and data staff.

These challenges have been integrated into a revised data collection plan for these points. In the appendix, we provide an overview of a short term and long term strategy to resolve these data needs. Short term (before the start of the 2016-2017 school year) identifies the BIE's data collection.

Long term implies (by the start of the 2016-2017 school year), we plan to address our data needs to capture the most accurate and reliable data to help formulate a useful gap analysis.

## **Data Analysis:**

This section provides a preliminary analysis of quartiles for both poor schools and rural schools. We examine the distribution of inexperienced, unqualified, and out of field teachers across identified poor and rural schools. In addition, due to BIE's unique school systems, we have divided the overall analysis for poor and rural schools into BIE operated schools and Tribally Controlled schools.

## **Poor Schools**

The definition of poor schools will be defined based on the definition for poor student. This is defined as whether a student is eligible for USDA's Free and Reduced Lunch Program. This information is pulled from the NASIS.

Table 1: Poverty Schools by Quartile School Year 2014-2015 show the number of schools in each quartile:

Breakdown of Poverty Schools by Quartile SY 2014-2015

| Poverty Quartile | Quartile | A: All BIE<br>Schools |
|------------------|----------|-----------------------|
|                  |          |                       |
| Low Poverty      | 1        | 27                    |
| Low-Mid Poverty  | 2        | 27                    |
| Mid-High Poverty | 3        | 27                    |
| High Poverty     | 4        | 26                    |
| Data Unavailable |          | 79                    |
|                  | Total    | 186                   |

In Table 1, the results for the 107 schools reporting, there is an equal distribution of schools across all four quartiles. These results are not surprising since a majority of American Indian student's qualify for free and reduced lunch programs with all 107 schools reporting 100% of students receiving free and reduced lunch. This is further supported by the U.S. Census data that show most American Indian reservations fall into high poverty areas. In future data analysis, the expectation is to obtain the data for the 79 schools not reporting.

Table 2: Average Percentage of **Inexperienced Teacher** for Low and High Poverty Quartile Schools (Native American Student Information System data files)

| Poverty Quartile          | Inexperience<br>d ( <i>Less than 3</i><br><i>years</i> )<br>Teacher<br>Count | Percent of<br>Inexperience<br>d Teacher |
|---------------------------|--|---|
| 1. Low Poverty            | 226  | 30.4%                                   |
| 2. Low-Mid Poverty        | 187  | 32.9%                                   |
| 3. Mid-High Poverty       | 229  | 37.2%                                   |
| 4. High Poverty           | 157  | 21.7%                                   |
| No Poverty Data Available | 441  |   |
| Total                     | 799  |   |
| 1 to 4                    | 1240   |   |

The preliminary results for Inexperienced Teachers for Low and High Poverty schools shows that in BIE's low poverty schools there are 30.4 percent of inexperienced teachers. Comparatively, there are approximately 21.7 percent of inexperienced teachers in the high poverty schools. This approximation

combines all school types under this data set. It's important to distinguish that the school system type plays a significant role in identifying gaps in these analyses due to oversight of these schools. Inexperienced teachers are defined as those teachers with two years or less of teaching experience.

Table 3: Average Percentage of **Unqualified teacher** for Low and High Poverty Quartile Schools (Native American Student Information System).

| Poverty Quartile    | Unqualified<br>Teacher<br>Count | Percent of<br>Unqualified<br>Teacher |
|---------------------|---------------------------------|--------------------------------------|
| 1. Low Poverty      | 3                               | 0.69%                                |
| 2. Low-Mid Poverty  | 4                               | 7.07%                                |
| 3. Mid-High Poverty | 8                               | 6.52%                                |
| 4. High Poverty     | 4                               | 4.89%                                |
| No Data Available   | 12                              |                                      |
| Total               | 31                              |                                      |
| 1 to 4              | 19                              |                                      |

The preliminary results for Unqualified Teachers for Low and High Poverty schools show that BIE's low poverty schools have 0.69 percent of unqualified teachers. Comparatively, there are 4.89 percent of unqualified teachers in the high poverty schools. This combines all school types under this data set. It's important that the school system type plays a significant role in identifying gaps in these analyses due to the level of BIE's oversight of these schools. For Tribally controlled schools reporting, there are 1 percent of unqualified teachers in low poverty schools compared to 5.68 percent of unqualified teachers. For Bureau operated schools reporting, there are 0.13 percent of unqualified teachers in low poverty schools compared to 2.98 percent in high poverty schools.

Table 4: Average Percentage of **Out of Field** teacher for Low and High Poverty Quartile Schools (Federal Personnel Payment System (FPPS) data files)

| Poverty Quartile          | Out of Field<br>Teacher | Percent of Out of Field Teacher Count (FPPS) |
|---------------------------|-------------------------|--|
| roverty Quartile          | Count (FPPS)            | For Bureau                                   |
|                           |                         | Operated                                     |
|                           |                         | Schools Only                                 |
| 1. Low Poverty            | 1                       | 1.35%  |
| 2. Low-Mid Poverty        | 1                       | 8.33%  |
| 3. Mid-High Poverty       | 0                       | 0  |
| 4. High Poverty           | 0                       | 0  |
| No Poverty Data Available |                         |  |
| Total                     |                         |  |
| 1 to 4                    | 2                       |  |

The preliminary results for Out of Field Teachers for Low and High Poverty schools shows that in BIE's low poverty schools, there are 1.35 percent of Out-of-Field teachers. Comparatively, there are no identified unqualified teachers in the high poverty schools. This approximation combines all school types under this data set through the Department of Interior's Federal Personnel Payment System (FPPS). This data is only applicable to Bureau Operated schools.

## **Rural Schools**

The Bureau of Indian Education is opting to use a rural indicator to capture the distribution of our schools. Through a very rough averaging of four indicators, the integration of these are averaged into our quartile framework.

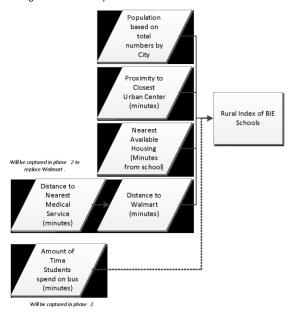


Diagram 1: Preliminary Measure of Rural Indicator for BIE Schools

Ruralness as a replacement for minority students reflects one of the biggest challenges confronting the BIE schools. Each of these variables when viewed independently show that population, distance to urban centers, proximity to closest housing, and proximity to Walmart.

- Population in City The total population numbers for each BIE's school.
- Proximity to closest Urban Center Based on minutes to the closes urban center.
- Nearest Housing Availability Based on minutes from the BIE school to the nearest available housing.
- Distance to Walmart Based on minutes from the BIE school to the nearest Walmart. We intend
  to exclude this variable in our next submission and replace with the distance to the nearest
  medical facility.
- Amount of Time Student's Spend on Bus This is based on existing transportation data that will be integrated into our analysis

The four indicators are based on a collection of information gathered through google maps. In the future, we expect to replace Distance to Walmart with distance to nearest medical service. We also will add to the rural index the amount of time students spend on the bus. Overall, the indicators combined reflects a more meaningful tool of analysis to capture the challenges confronting American Indian students attending our BIE schools.

Table 5: Rural Schools by Quartile School Year 2014-2015 show the number of schools in each quartile.

| Breakdown of Rural Most to Low of BIE Schools by Quartile SY |           |              |  |  |  |
|--|-----------|--------------|--|--|--|
|  | 2014-2015 |              |  |  |  |
|  |           |              |  |  |  |
| Rural Quartile   | Quartile  | # of Schools |  |  |  |
|  |           |              |  |  |  |
| 1. Most Rural  | 1 45      |              |  |  |  |
| 2. Low-Mid Rural   | 2         | 47           |  |  |  |
| 3. Mid-Low Rural   | 3 45      |              |  |  |  |
| 4. Low Rural   | 4 48      |              |  |  |  |
| 185  |           |              |  |  |  |

In Table 5, for the 185 schools reporting, there is an equal distribution of BIE's schools across all four quartiles.

Table 6: Average Percentage of **Inexperienced Teacher** for Most Rural and Low Rural Quartile Schools (Native American Student Information System).

|                  | Inexperience<br>d Teacher<br>Count | Percent of<br>Inexperience<br>d Teacher |
|------------------|------------------------------------|---|
| Rural Quartile   |                                    |   |
| 1. Most Rural    | 224                                | 26.79%                                  |
| 2. Low-Mid Rural | 243                                | 34.56%                                  |
| 3. Mid-Low Rural | 353                                | 30.27%                                  |
| 4. Low Rural     | 413                                | 28.49%                                  |

Phase 1 – Preliminary Plan Submission

| Data Unavailable | 7    |  |
|------------------|------|--|
| Total            | 1240 |  |
| 1 to 4           | 1233 |  |

The preliminary results for Inexperienced Teachers for Most Rural and Low Rural schools shows that in BIE's most rural schools, there are 26.79 percent of inexperienced teachers. Comparatively, there are approximately 28.49 percent of inexperienced teachers in the low rural schools. This approximation combines all school types under this data set. It's important that the school system type plays a significant role in identifying gaps in these analyses due to oversight of these schools.

Table 7: Average Percentage of **Unqualified teacher** for Most Rural to Low Rural Quartile Schools (Native American Student Information System).

|                  | Unqualified | Percent of  |
|------------------|-------------|-------------|
|                  | Teacher     | Unqualified |
| Rural Quartile   | Count       | Teacher     |
| 1. Most Rural    | 18          | 3.86%       |
| 2. Low-Mid Rural | 22          | 3.92%       |
| 3. Mid-Low Rural | 42          | 6.13%       |
| 4. Low Rural     | 20          | 3.09%       |
| Data Unavailable |             |             |
| Total            |             |             |
| 1 to 4           | 102         |             |

The preliminary results for Inexperienced Teachers for Most Rural and Low Rural shows that in BIE's most rural schools, there are 3.86 percent of unqualified teachers. Comparatively, there are approximately 3.09 percent of unqualified teachers in the low rural schools. This approximation combines all school types under this data set. It's important that the school system type plays a significant role in identifying gaps in these analyses due to the level of BIE's oversight of these schools.

Table 8: Average Percentage of **Out of Field** teacher for Most Rural to Low Rural Quartile Schools (Federal Personnel Payment System (FPPS) data files)

|                  | Out of Field | Percent of<br>Out of Field |
|------------------|--------------|----------------------------|
|                  | Teacher      | Teacher                    |
| Rural Quartile   | Count (FPPS) | Count (FPPS)               |
| 1. Most Rural    | 3            | 26.39%                     |
| 2. Low-Mid Rural | 1            | 33.33%                     |
| 3. Mid-Low Rural | 1            | 1.35%                      |
| 4. Low Rural     | 1            | 8.33%                      |
| Data Unavailable |              |                            |
| Total            |              |                            |
| 1 to 4           |              |                            |

The preliminary results for Out of Field Teachers for Most Rural and Low Rural shows that in BIE's most rural schools, there are 26.39 percent of Out-of-Field teachers. Comparatively, there are 8.33 percent Out of Field teachers in the low rural schools. This approximation only examines Bureau Operated Schools all school types under this data set through the Department of Interior's Federal Personnel Payment System (FPPS).

## **Gap Identification:**

Table 9: Gap analysis of both school types by teacher types.

|                       | School Type:                   |              |       |
|-----------------------|--------------------------------|--------------|-------|
|                       | 1. Low Poverty 4. High Poverty |              | Gap   |
| Inexperienced Teacher | 30.4%                          | 21.7%        | 8.7%  |
| Unqualified Teacher   | 0.69%                          | 4.89%        | -4.2% |
| Out of Field Teacher  | 1.35%                          | 0.00%        | 1.35% |
|                       | 1. Most Rural                  | 4. Low Rural | Gap   |
| Inexperienced Teacher | 26.79%                         | 28.49%       | -1.7% |
| Unqualified Teacher   | 3.86%                          | 3.09%        | 0.77% |

| Out of Field Teacher                                | 26.39% | 8.33% | 18.06% |
|---|--------|-------|--------|
| Note: Preliminary review using incomplete data set. |        |       |        |

The preliminary results provide an overview of the equity gaps detected across the Bureau of Indian Education school systems. The most noticeable differences is that the percentage of teacher types are equally distributed across both school types (rural and poor schools).

## **Stakeholder Groups:**

The BIE Senior Leadership identified our activities to support our outreach to stakeholders. This discussion occurred on January 22, 2016. We unified our senior leadership to highlight the challenges of definitions. We identified the following as our preliminary outreach plan. There are six goals motivating our outreach to principals, teachers, school boards, parents, Teacher Education Departments, and school staff. We currently do not have counts for parents, but have established this as our goals for outreach. We have organized the data to be segmented by the three types of ADDs.

Another important feature of the distribution of our outreach is based on the BIE's reorganization currently underway. The BIE is realigning staff and reporting relationships within the BIE to improve services to schools and tribes. According to the BIE, the realignment will:

- 1. Shift the management focus to the field;
- 2. Clarify roles and responsibilities;
- 3. Acknowledge the different requirements of Bureau operated schools and tribally controlled schools to better meet their needs; and
- 4. Establish clear reporting and accountability structures for academic operations and administrative operational functions.

The ADDs realignment to the school function types will provide an opportunity for the ADDs to understand the dynamics of their schools and relationship to teachers. As we noted in the introduction, the BIE's reorganization provides a great opportunity for the ADDs to connect to their schools and the unique management needs of the schools. The field structure will be aligned according to the types of schools serviced – tribally controlled or bureau operated – rather than the old structure which was organized solely on a geographical basis.

The majority of BIE schools, 70 percent, are operated by tribal nations or locally controlled school boards but the BIE organizational structure has never evolved to meet this reality. Because the needs of a bureau operated school are so different than the needs of a tribally controlled school, the BIE proposes to realign its functions to better meet these divergent needs. The reorganization will improve

service to grant schools, bureau operated schools, and tribal communities, and clarify lines of accountability within the organization. The proposed field structure establishes Associate Deputy Director positions for bureau operated, tribally controlled, and Navajo schools each responsible for the management of ERCs which provide direct service.

Under the current structure, Associate Deputy Directors (ADDs) are organized by geographic locations: ADD East; ADD West; ADD Navajo. This has changed to the following:

- Associate Deputy Director Tribally Controlled Schools
  - o Main office located in Minneapolis, Minnesota
  - o Will oversee 97 schools
  - o Projected to work with 53 tribes in 21 States
  - O 1 Education Resource Center or ERC will be designated per every 13 schools for a total of 7 ERCs under this division (See NIEA's fact sheet on ERCs)1 full time employee per school
  - o 1 school solutions team working with cluster of schools
  - o 7 school solutions team will be housed under each ERC
- Associate Deputy Director Bureau Operated Schools
  - o Main office located in Albuquerque, New Mexico
  - o Will oversee 23 schools
  - o Projected to work with 17 tribes in 8 States
  - O 1 Education Resource Center or ERC will be designated per every 7 schools for a total of 3 ERCs under this division (See NIEA's fact sheet on ERCs)
  - o 1 full time employee per school
  - o 3 school solutions teams will be housed under each ERC
- Associate Deputy Director Navajo Schools
  - O Main office located in Window Rock, Arizona
  - O Will oversee 65 schools (there are 66 schools on or near the Navajo reservation but one school has opted to fall under ADD Tribally Controlled)
  - O Will work with only one tribe the Navajo Nation
  - 1 Education Resource Center or ERC will be designated per every 13 schools for a total of 5 ERCs under this division
  - o 1 full time employee per 3 schools
  - o 3 school solutions teams will be housed under each ERC

The ADDs will serve as the agents in the field to engage the varied stakeholders.

Table 10: Clarify our Stakeholders Group Distributed by ADDs.

|              | ADD Tribally       | ADD Bureau | ADD Navajo |         |
|--------------|--------------------|------------|------------|---------|
|              | Controlled Schools | Operated   | Tribally   | Bureau  |
| Stakeholders |                    |            | Controlle  | Operate |

|                   |             |     | d  | d   |
|-------------------|-------------|-----|----|-----|
|                   |             |     |    |     |
| Principals        | 96          | 24  | 31 | 34  |
| Teachers          | Unavailable | 445 | -  | 460 |
| School Boards     | 96          | 24  | 31 | 34  |
| Parents           | 15          | 5   | 10 | 10  |
| Staff             | 96          | 24  | 31 | 34  |
| Tribal Education  |             |     |    |     |
| Departments       |             |     |    |     |
| Recipients of SIE |             |     |    |     |
| and TED/Tribes    | 9           | 3   | 1  | -   |

By engaging these major stakeholders, each ADD currently has a routine engagement schedule with their assigned schools. The following table shows our goals in the early stages of stakeholder engagement.

Table 10: Clarify our Stakeholder Engagement – Communication Roll-out

| Goals:  | Activities:  | Date:         | Stakeholder:  | Ownership: | Goal:   |  |  |
|---|--|---------------|---|------------|---|--|--|
| Phase II – February to June 2016                                |  |               |   |            |   |  |  |
| 1: Gather input and stakeholder                                 | Develop 'Principal Feedback<br>Form' Link to Google Form | 1/12/201<br>6 |   | Kristen    |   |  |  |
| consensus on the 5 primary teacher                              | Webinar  | 2/23/201<br>6 | Principals  | ADD Bureau | 27 Principals   |  |  |
| definitions,<br>student   | Webinar  | 2/22/201<br>6 | Principals  | ADD Tribal | 93 Principals   |  |  |
| definitions, types of measures.                                 | Monthly Meeting  | 2/19/201<br>6 | Principals  | ADD Navajo | 65 Principals   |  |  |
|   | TED Partnership Meetings                                 | 2/25/201<br>6 | Tribal<br>Education   | ADD Navajo | 1 TED   |  |  |
|   | Navajo School Board<br>Meetings                          | 2/28/201<br>6 | School Board  | ADD Navajo | 65 School<br>Boards   |  |  |
|   | Navajo Parents Meetings                                  | 3/1/2016      | Parents   | ADD Navajo |   |  |  |
| 2: Present data results aligned to definitions to stakeholders. | Webinar  | 3/22/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Bureau | 27<br>Principals,<br>Teachers,<br>school staff<br>and parents |  |  |

|  | Webinar         | 3/22/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Tribal | 93<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|--|-----------------|---------------|---|------------|---|
|  | Monthly Meeting | 3/22/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Navajo | 65<br>Principals,<br>Teachers,<br>school staff<br>and parents |
| 3: Present and determine root cause analysis and obtain consensus from the field.  Derive a theory of action to address root causes. | Webinar         | 4/26/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Bureau | 27<br>Principals,<br>Teachers,<br>school staff<br>and parents |
| root causes.   | Webinar         | 4/26/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Tribal | 93<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|  | Monthly Meeting | 4/26/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Navajo | 65<br>Principals,<br>Teachers,<br>school staff<br>and parents |
| 4: Present and determine strategies and obtain consensus from the field.   | Webinar         | 5/24/201<br>6 | Principals, teachers, special education and title personnel, administrators, other staff, and                               | ADD Bureau | 27<br>Principals,<br>Teachers,<br>school staff<br>and parents |

|  |                 |               | parents.  |              |   |
|--|-----------------|---------------|---|--------------|---|
|  |                 |               |   |              |   |
|  |                 |               |   |              |   |
|  | Webinar         | 5/24/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Tribally | 93<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|  | Monthly Meeting | 5/24/201<br>6 | Principals, teachers, special education and title personnel, administrators, other staff, and parents.                      | ADD Navajo   | 65<br>Principals,<br>Teachers,<br>school staff<br>and parents |
| Phase 3: August 201                                    |                 | F /2 4 /2 04  | I 5 · · ·   | 4000         |   |
| Goal 5: Begin the roll out of strategies to the field. | Webinar         | 5/24/201<br>6 | Principals, teachers, special education and title personnel, administrators, other staff, and parents.                      | ADD Bureau   | 27<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|  | Webinar         | 5/24/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Tribally | 93<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|  | Monthly Meeting | 5/24/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Navajo   | 65<br>Principals,<br>Teachers,<br>school staff<br>and parents |

| Goal 6: Derive a logic model to clarify what the BIE intends to do, how it will implement the strategies, and map out resources. | Webinar         | 6/28/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Bureau   | 27<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|--|-----------------|---------------|---|--------------|---|
|  | Webinar         | 6/28/201<br>6 | Principals, teachers, special education and title personnel, administrators, other staff, and parents.                      | ADD Tribally | 93<br>Principals,<br>Teachers,<br>school staff<br>and parents |
|  | Monthly Meeting | 6/28/201<br>6 | Principals,<br>teachers,<br>special<br>education and<br>title personnel,<br>administrators,<br>other staff, and<br>parents. | ADD Navajo   | Principals,<br>Teachers,<br>school staff<br>and parents       |

## **Conclusion**

This first submission provides the Bureau of Indian Education's preliminary plan. We are working to build our engagement with the multitude of stakeholders and overcoming the challenges of our data. We have also outlined our efforts to revise our existing Native American Student Information System (NASIS) to support our efforts to gather high quality data. Under Appendix B, we identify an outline of our data plan that will support some long term goals to submit a more refined and robust data set.

## **Appendix:**

25 State Literature Review of Prominent Themes:

Some of these trends include the following:

## 1. Inexperienced Teacher

Of the twenty-five states in the review, most define teaching experience as any teaching experience (typically not including student teaching). In some cases, the determination of a definition of teaching experience relied upon the availability of data rather than policy content.

| Type of Experience | Number of States |
|--------------------|------------------|
| Any teaching       | 18               |
| In state           | 4                |
| In district        | 1                |
| In subject         | 1                |
| In school          | 1                |

The states' definitions of "inexperienced teacher" range from one year or less of experience to five years or less of experience, with an average of 2.28 years.

| Years to Define<br>"Inexperienced" | Number of States |
|------------------------------------|------------------|
| 1 or less                          | 10               |
| 2 or less                          | 1                |
| 3 or less                          | 12               |
| 4 or less                          | 1                |
| 5 or less                          | 1                |

## 2. <u>Unqualified Teacher</u>

There are many factors that tend to be considered in the determination of "unqualified teacher" and "highly qualified teacher" by the states that BIE reviewed. These factors include the following:

- Bachelor's degree
- Teacher preparation education/degree
- Licensure and/or certification

- In-state licensure and/or certification
- Provisional and/or emergency permit/licensure
- Subject competence
- Teaching experience

States used a variety of combinations of the factors outlined above; it is difficult to track exact trends since states usually employ differing terms and have in place differing processes around issues like teacher certification or demonstration of core competence. A further interesting point is that some states chose to define an unqualified teacher as any teacher who is not highly qualified (with highly qualified status being determined by some combination of the factors above). This may be indicative of a recent trend toward fewer and fewer teachers in the workforce not being highly qualified.

#### 3. Out-of-Field Teacher

Of the three standard definitions, out-of-field teacher was generally the least-emphasized definition across the state plans that BIE reviewed. States tended to indicate that this was the result of very few teachers in their state qualifying as out-of-field anymore. Indeed, one state explained that it is not allowable under their state law. Like in the various definitions for "unqualified teacher" and "highly qualified teacher," there were many factors combined in a variety of ways across the state plans to produce a definition of out-of-field teacher. These factors include the following:

- Certification and/or licensure in their teaching subject and/or grade level
- Having provisional or emergency licensure
- Endorsement in a subject and/or grade level
- Demonstration of competence in a subject and/or grade level
- Teaching a subject without having majored in it
- Level of preparation for the particular subject and/or grade level
- Highly qualified status in their teaching subject and/or grade level
- Highly qualified status in general

Most of the states applied out-of-field status at least to subject matter, while some states additionally applied it to grade-level, as indicated above.

## 4. Poor Student

Of the twenty-five state plans BIE reviewed, twenty-two solely used eligibility for free or reduced price lunch (FRPL) to define which students qualify as poor. The other three states used eligibility for FRPL as one factor that could qualify a student as poor while providing other factors that would qualify students as poor as well. These other factors include the following:

- Children in families receiving assistance under a state program funded under the Social Security Act
- Children eligible to receive medical assistance under Medicaid

- Students eligible for Supplemental Nutrition Assistance Program (SNAP)
- Students eligible for Temporary Assistance for Needy Families (TANF)
- Students awaiting foster care
- Migrant students
- Incarcerated students
- Homeless students

States also used a variety of terms instead of or in addition to "poor" to describe these kinds of students, including the following:

- Low-income
- Economically disadvantaged
- Socioeconomically disadvantaged
- In poverty

## 5. Minority Student

Twenty-four of the twenty-five state plans that BIE reviewed defined "minority" as some combination of "a student identified as a member of a minority race or ethnicity" and/or "any race or ethnicity other than white." The only state that did not do so, North Dakota, defined it as any student who has "racial or ethnic origins in any group other than the majority for the state."

#### **BIE SENIOR LEADERSHIP PARTICIPANTS**

## **Teacher Equity Project Report (All)**

ED requires the BIE to develop a Teacher Equity Plan. This session will present the preliminary report and seek input from the Senior Leadership.

- 1. Dr. Charles Monty Roessel, Director, Bureau of Indian Education
- 2. Ms. Vicki Forrest, Deputy Bureau Director
- 3. Ms. Juanita Mendoza, Chief of Staff
- 4. Dr. Jeffrey Hamley, ADD, Division of Performance and Accountability
- 5. Dr. Tamarah Pfeiffer, ADD, Navajo Schools
- 6. Mr. Tony Dearman, ADD, Bureau Operated Schools
- 7. Ms. Rosie Davis, ADD, Tribally Controlled Schools
- 8. Mrs. Gayeleia King, Program Manager, Title Programs
- 9. Dr. Joel Longie, Program Manager, School Improvement Grant
- 10. Mrs. Gloria Yepa, Program Manager, Special Education
- 11. Mrs. Anita 'Sue' Bement, Program Manager, FACE
- 12. Dr. Maureen Lesky, Education Research Analyst
- 13. Ms. Susan McCabe, NASIS Specialist
- 14. Ms. Wendy Greyeyes, Chief Implementation Officer
- 15. Ms. Kristen Kruger, SINSI Fellow
- 16. Mr. Kevin Zimmer, Consultant, The New Teacher Project
- 17. Ms. Robin Peterson, Consultant, The New Teacher Project
- 18. Dr. Monica Young, EASN

## **Data Collection Work plan**

|   | Variable               | Working<br>Definition                                      | Working<br>Measure   | School<br>Type                     | Data Source  | Owne<br>r | Timelin<br>e   |
|---|------------------------|--|--|------------------------------------|--|-----------|----------------|
| 1 | Inexperience           | A teacher  | A teacher's  | Bureau                             | HR Federal   | HR        | Short-         |
| _ | d Teacher              | with three or<br>fewer years<br>of teaching<br>experience. | start date<br>and end<br>date.                                 | Operated<br>Schools                | Pay-roll Payment System Field: "Effective Date"  |           | Term           |
|   |                        |  |  | Both                               | NASIS Field: Seniority (1, 2, 3, T), Start Date of Employment & End Date of Employment (SY 14-15)                        | NASIS     | Short-<br>Term |
|   |                        |  |  | Both                               | Activate and require NASIS Field: Seniority (1, 2, 3, T) by schools; embed into training.                                | NASIS     | Long-<br>Term  |
| 2 | Unqualified<br>Teacher | Any teacher that DOES NOT have a state certification.      | A teacher<br>that self-<br>identifies<br>their<br>certificatio | Bureau<br>Operated<br>Schools      | HR FPPS Field: "Addendum" (meaning provisional status)   | HR        | Short-<br>Term |
|   |                        |  | n as<br>entered<br>into NASIS.                                 | Both                               | NASIS Field:<br>Certification<br>(1: Full; 2:<br>Temporary; 3:<br>Emergency; 4:<br>Provisional)<br>(SY 14-15, 15-<br>16) | NASIS     | Short-<br>Term |
|   |                        |  |  | Tribally<br>Controlle<br>d Schools | Activate and require NASIS Field: Certification (1: Full; 2: Temporary; 3: Emergency; 4:                                 | NASIS     | Long-<br>Term  |

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| 3 | Out of Field<br>Teacher | A teacher<br>teaching in a<br>core<br>academic<br>subject or a<br>grade for<br>which the<br>teacher does                            | A teacher<br>detailed to<br>teach in a<br>different<br>subject. | Bureau<br>Operated<br>Schools | Provisional); clarify definitions and require in training.  HR FPPS Field: "Nature of Action" (Means principal has detailed teacher to another class)  | HR    | Short-<br>Term |
|---|-------------------------|---|---|-------------------------------|--|-------|----------------|
|   |                         | not meet the NCLB definition of highly-qualified. Includes teaching without a major, with only a minor or without any endorsement . |   | Both                          | NASIS Field: A combination of unchecked "Certification", "Teacher of Record"; "Course Study" and "Highly Qualified". If any unchecked for one teacher, will result in Out of Field Teacher. Will provide definition to schools, require the fields, and embed in training. | NASIS | Long-<br>Term  |
| 4 | Poor Student            | A student's<br>eligibility for<br>USDA's Free<br>and Reduced<br>Lunch<br>Program.   | Student's<br>eligibility<br>for FRAM<br>(yes or no)             | Both                          | "FRAM" indicator from district NASIS edition will be moved to State NASIS edition. Can provide information on these area with infinite   | NASIS | Short-<br>Term |

|   |   |                                       |  |                                    | campus. 1<br>data pull with<br>Chief Leschi.  |       |                |
|---|---|---------------------------------------|--|------------------------------------|---|-------|----------------|
|   |   |                                       |  | Both                               | "FRAM" indicator from district NASIS edition will be moved to State NASIS edition. Will require by schools. | NASIS | Long-<br>Term  |
| 5 | Minority<br>Student - will<br>replace with<br>Rural | A student's racial identification.    | Federal racial categories identified                                     | Bureau<br>Operated<br>Schools      | "Race" by<br>student from<br>NASIS State<br>Edition   | NASIS | Short-<br>Term |
|   | Indicators  |                                       | by White,<br>Asian,<br>Hispanic,<br>American<br>Indian, or<br>unreported | Tribally<br>Controlle<br>d Schools | "Race" by<br>student from<br>NASIS State<br>Edition   | NASIS | Short-<br>Term |
|   |   | A student's<br>tribal<br>affiliation. | Federally<br>recognized<br>tribal<br>affiliation<br>by census.           | Both                               | "Tribal<br>Indicator" or<br>"9999" by<br>student from<br>NASIS State<br>Edition                             | NASIS | Short-<br>Term |