

Bureau of Indian Education  
 Targeted Monitoring Review of  
 School Improvement Grants (SIG) under section 1003(g) of the  
 Elementary and Secondary Education Act of 1965  
 May 7-10, 2012

**BACKGROUND**

<b>FY 2009 SIG Schools</b>		
<b>Tier</b>	<b>Number of SIG-eligible Schools</b>	<b>Number of SIG Schools Funded</b>
Tier I	6	5
Tier II	0	0
Tier III	120	14

<b>FY 2009 SIG Intervention Models</b>	
<b>Models</b>	<b>Number of SIG Schools Implementing the Model</b>
Turnaround	0
Transformation	5
Restart	0
Closure	0

**MONITORING TRIP INFORMATION**

<b>Monitoring Visits</b>	
<b>Education Line Office Visited</b>	<i>New Mexico South</i>
<b>School Visited</b>	<i>T'siyah Day School</i>
<b>Model Implemented</b>	<i>Transformation</i>
<b>FY 2009 Funding Awarded (over three years)</b>	<i>School-level funding: \$2,647,480</i>
<b>Education Line Office Visited</b>	<i>New Mexico Navajo South</i>
<b>School Visited</b>	<i>Alama Navajo Community School</i>
<b>Model Implemented</b>	<i>Transformation</i>
<b>FY 2009 Funding Awarded (over three years)</b>	<i>School-level funding: \$3,079,376</i>
<b>SEA Visited</b>	<i>Bureau of Indian Education</i>
<b>FY 2009 SIG Award</b>	<i>\$3,792,623 Regular (\$20,869,682 ARRA)</i>
<b>FY 2010 SIG Award</b>	<i>\$3,682,263</i>

**Staff Interviewed**

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- *SEA Staff: Joel Longie, Stanley Holder, Jeffrey Hamley, Laura Lowe, GayeLeia King, ADD Navajo South*
- *New Mexico South Education Line Office Staff: Education Line Officer*
- *T'siyah Day School Staff: Principal, 4 teachers, 5 parents, students, and 2 classroom visits*
- *New Mexico Navajo South Education Line Office Staff: Education Line Officer*
- *Alamo Navajo Community School Staff: School Board members, Principal, Leadership Team, 4 teachers, 5 parents, students, and 2 classroom visits*

U.S. Department of Education Staff	
Team Leader	Carlas McCauley
Staff Onsite	Mike Lamb & Bill McGrady (Consultant)

**OVERVIEW OF MONITORING REPORT**

The following report is based on the U.S. Department of Education's (ED) onsite monitoring visit the Bureau of Indian Education (BIE) from May 7 to May 10, 2012 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of two sections: *Technical Assistance Recommendations* and *Monitoring Findings*. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

The Department will later issue a *Summary and Observations* addendum that describes the implementation of the SIG program by the SEA, LEAs, and schools visited; initial indicators of success; and any outstanding challenges being faced in implementation. That addendum will focus on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, teachers and leaders, instructional strategies and time, use of data, and technical assistance.

**TECHNICAL ASSISTANCE RECOMMENDATION**

*This section addresses areas where additional technical assistance may be needed to improve the quality of implementation of the SIG program.*

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**Issue (1):** The BIE did not have a process for ensuring that LEA purchases made with SIG funds were processed in a timely manner.

**Technical Assistance Strategies:**

- The BIE should develop a strategy for prioritizing SIG expenditures to ensure funds are used in accordance with school budgets and plans for the corresponding years.  
(Responsibility: BIE)

**Issue (2):** The BIE did not have a process in place for schools to make amendments to its approved SIG application. As a result, the BIE had difficulty tracking budgets and school implementation.

**Technical Assistance Strategies:**

- The BIE should (a) develop and post on the BIE website written guidance and a standard format that LEAs must use to propose substantive programmatic and fiscal changes to their SIG applications, (b) develop and post on the BIE website a checklist the BIE staff will use to review and make determinations on substantive programmatic and fiscal amendments to approved SIG plans, (c) develop a plan and timeline to train LEA and BIE staff responsible for SIG implementation about the standard format and checklist the BIE will use to review and approve SIG amendments

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**MONITORING FINDINGS**

**Summary of Monitoring Indicators**

Critical Element	Requirement	Status	Page
<b>1. Application Process</b>	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	6
<b>2. Implementation</b>	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	6-8
<b>3. Fiscal</b>	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	Finding	8
<b>4. Technical Assistance</b>	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	8-9
<b>5. Monitoring</b>	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and	Finding	13-14

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	Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]		
<b>6. Data Collection</b>	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	9-10

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**Monitoring Area: School Improvement Grant**

**Critical Element 1: The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program.**

**Finding (1):** The SEA did not ensure that the LEA application process was carried out consistent with its approved SIG application and the SIG requirements. The SEA failed to provide evidence documenting the selection criteria it used to make SIG awards.

**Citation:** Sections II.B.2(a) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), requires an SEA to review and approve, consistent with the requirements, an application for a School Improvement grant that it receives from an LEA.

**Further action required:** The BIE must provide to the Department evidence that it administered its FY 2010 competition this year consistent with its approved FY 2010 SIG application. The evidence must include a copy of the LEA application used to make a determination on the award, and the specific criteria used to determine that SIG requirements will be carried out to ensure that funded schools are implementing one of the models fully and effectively. Should the Department determine that the 2010 competition was not carried out consistent with the approved application, ED may seek additional correction action measures.

**Finding (2):** The BIE did not post the required documentation on its Web site within 30 days of awarding School Improvement Grants to complexes.

**Citation:** Section II.B.3 requires an SEA to post on its website, within 30 days of awarding school improvement grants to LEAs, all final LEA applications (75 C.F.R. [October 28, 2010]).

**Further action required:** The BIE must post on its website within 30 days of receipt of this report all final LEA applications, as well as a summary of those grants that includes the following information: (a) name and National Center for Education Statistics (NCES) identification number of each LEA awarded a grant; (b) amount of each LEA's grant; (c) name and NCES identification number of each school being served; and (d) type of intervention being implemented in each Tier I and Tier II school.

**Critical Element 2: The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.**

**Finding (1).** The BIE did not ensure that all schools have implemented increased learning time, as required for the transformation model. While schools appeared to have increased the length of the day and/or year, there did not appear to be evidence that schools had increased learning time for teachers to collaborate, plan, and engage in professional development within and across grades and subjects.

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Citation: Section I.A.2(a)(viii) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), requires an LEA implementing the turnaround model to establish schedules and implement strategies that provide increased learning time (as defined in the final requirements.)

Further action required: The BIE must submit evidence to the Department that it has reviewed each LEA that received SIG funds to implement the transformation model to determine if increased learning time is being provided consistent with the SIG final requirements. The BIE must submit to the Department a timeline for implementation of increased learning for any school it determines is not currently doing so.

**Finding (2): The BIE has not ensured that all schools have established a system of rewards for school leaders, teachers, and other staff as required by the transformation model.**

Citation: Section I.A.2. (d)(1)(i)(c) requires that an LEA must identify and reward school leaders, teachers, and other staff who in implementing this model, have increased student achievement and high school graduation rates and identify and remove those who, after ample opportunities, have been provided for them to improve their professional practice, have not done so.

Further action required: The BIE must submit to ED evidence that it has reviewed the progress of all schools that received SIG funds to implement the transformation model to ensure that these schools are identifying and rewarding school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement. As a part of the evidence, the BIE also must submit to ED the results of that review and for any schools that are not implementing a rewards system the BIE must submit the steps it will take to ensure that all schools receiving SIG funds to implement the transformation model have done so.

**Finding (3): The BIE has not ensured that all schools are implementing a teacher evaluation system that takes into account student growth on state assessments as a significant factor. as required by the transformation model.**

Citation: Section I.A.2. (d)(1)(i)(B) requires that an LEA must use rigorous, transparent, and equitable evaluation systems for teachers and principals that take into account data on student growth (as defined in the final requirements) as a significant factor as well as other factors such as multiple observation-based assessments of performance and ongoing collections of professional practice reflective of student achievement and increased high school graduation rates, and are designed and developed with teacher and principal involvement.

Further action required: The BIE must provide a timeline to the Department for implementation of a principal and teacher evaluation system consistent with the final requirements within 30 days of the receipt of this report.

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**Finding (4):** The BIE has not ensured that all schools are providing focused high-quality professional development as outlined in the final requirements. The BIE approved a number of schools to hire coaches and school leaders for the purpose of supporting high-quality professional development but many of those schools have not hired for those positions after two years, and no documentation of amendments was provided.

Citations: Section I.A.2. (d)(1)(i)(D) requires that an LEA must provide staff ongoing, high-quality, job-embedded professional development (e.g., regarding subject specific pedagogy, instruction that reflects a deeper understanding of the community served by the school, or differentiated instruction) that is aligned with the school’s comprehensive instructional program and designed with school staff to ensure they are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies.

**Further action required:**

The BIE must submit a plan detailing how it will ensure that schools receiving SIG funds will implement high-quality professional development during the 2012-2013 school year.

**Critical Element 3: The SEA ensures complexes and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87].**

**Finding (1):** The BIE did not ensure that LEAs received awards that were of sufficient size and scope to support the activities outlined in the LEA applications to fully and effectively implement the intervention models in SIG schools. During the FY 2009 SIG application process, it was not clear that schools were being awarded funds based on needs. The BIE decreased the budget of some schools in the second year and was not able provide criteria or documentation about why budgets were decreased.

Citation: Section II.B.5 of the final requirements for the SIG program states that “[a]n SEA must award a School Improvement Grant to an LEA in an amount that is of sufficient size and scope to support the activities required under section 1116 of the ESEA and these requirements. The LEA’s total grant may not be less than \$50,000 or more than \$2,000,000 per year for each Tier I, Tier II, and Tier III school that the LEA commits to serve.” (75 FR 66363, 66369 (October 28, 2010))

**Further action required:** The BIE must, within 30 days, submit an assurance that moving forward, the BIE will continue to make awards decisions by reviewing the amount of funds each LEA needs to fully and effectively implement school intervention models.

**Critical Element 4: The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program.**

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**Finding (1):** The BIE has not provided technical assistance to ensure that LEAs and schools have knowledge of SIG requirements and support to implement the SIG reforms. The SEA did not have a strategy to support SIG implementation, and had not created an Office of School Turnaround as outlined in its SEA application. BIE DPA staff and Education Line Officers reported that there were not clear lines of responsibility for supporting SIG schools in implementing SIG requirements.

**Citation:** The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))].

**Further action required:** The BIE must submit to the Department, within 30 days, a strategy for providing technical assistance for the FY 2009 and FY 2010 SIG recipients. The strategy must include a timeline for when the technical assistance strategy will begin, and must clarify the roles of the DPA and Education Line Officers.

**Critical Element 5: The SEA ensures that monitoring of complexes and schools is being conducted consistent with the final requirements of the SIG program.**

**Finding:** The BIE has not monitored SIG implementation as outlined in its approved application.

**Citation:** Section 80.40 of the Education Department General Administrative Regulations (EDGAR) states that grantees must monitor grant and subgrant activities to ensure compliance with applicable Federal requirements. Section 9304(a) of the ESEA requires that the SEA must ensure that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

**Further action required:** The BIE must submit to the Department a timeline and monitoring protocol for its future monitoring efforts for FY 2009 and FY 2010 SIG recipients.

**Critical Element 6: The SEA ensures that data are being collected consistent with the final requirements of the SIG program.**

**Finding (1):** The BIE has not ensured that the required data elements have been collected from LEAs and submitted to EDFacts.

**Citation:** Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) require SEAs to report on data with respect to SIG.

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Further action required: The BIE must submit to the Department, within 30 days, a timeline and plan for ensuring that all required data for all SIG schools are submitted..