

# TRIBAL EDUCATION DEPARTMENTS NATIONAL ASSEMBLY



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**June 30, 2017**

Office of the State Superintendent  
Oklahoma State Department of Education  
Oliver Hodge Building  
2500 North Lincoln Boulevard  
Oklahoma City, OK 73105

Dear Superintendent Hofmeister:

The Tribal Education Departments National Assembly (TEDNA) respectfully submits necessary comments regarding the Oklahoma State Department of Education (OSDE) Draft Consolidated State Plan #2<sup>1</sup> as per the Every Student Succeeds Act (ESSA):

- TEDNA supports the following stakeholder engagement strategies 3.3, 4.1, and 4.2<sup>2</sup> regarding working relationships, sharing knowledge, and improving data systems.
- Section I(1)<sup>3</sup> regards partnership with Tribal Education Agencies (TEA). We recommend an expanded qualification of TEA to include Tribal Education Departments (TED); the acronym TEA is a Federal U.S. Department of Education designation, while TED is a synonymous designation provided by OK 70 Stat. § 70-3-171 (2014) the "Oklahoma Advisory Council on Indian Education Act."
- Figure 2<sup>4</sup> describes a previous suggestion made about student counts verified by Title VI "Indian Education" as provided by the Every Student Succeeds Act rather than the reported count from OSDE; TEDNA supports this suggestion as a matter to improve reporting accuracy and its methodology.

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<sup>1</sup> **Complete Copy of 445 page state plan:** <http://sde.ok.gov/sde/documents/2017-06-01/essa-plan-draft-2>

<sup>2</sup> **Page 16** refers to implementation strategies 3.3; 4.1; and 4.2 unders stakeholder engagement;

<sup>3</sup> **Page 101** refers to an implementation strategy to fulfill "Student Identification" Title VI, Subtitle B: Education for Homeless Children and Youth program, McKinney-Vento Homeless Assistance Act;

<sup>4</sup> **Page 18** refers to OSDE holding a specific topical convening on Indian Education where representatives made suggestions regarding student count methodology, cultural competency, and early college and career readiness.

- Section I(1)(4)<sup>5</sup> regards homeless coordinators to communicate with agency designee(s) on various councils/committees; we not only recommend soliciting assistance from the TEA but also soliciting, with coordination from the TEA, any available Tribal agencies such as: Indian Child Welfare, Social Services, and/or Grants Department.
- Section A(1)<sup>6</sup> regards all districts and schools will be given resources to use a data inquiry framework that informs programmatic, funding and policy decision; we recommend that TEAs also qualify as recipients to receive these resources and tools.
- Section A(3)(ii)<sup>7</sup> regards that Oklahoma is an English-only state and does not offer assessments to students in languages other than English as per OK 70 Stat. § 11-102; we recommend adoption of assessments in the language of instruction.
- Section D(2)<sup>8</sup> regards low-income and minority students having equitable access to effective educators; we recommend there be a statewide coordination with all available TEAs for developing recruitment strategies that increase the number of Native American educators in not only districts that have higher percentages of Native American students, but also non-native students who can benefit from culturally competent educator leadership.
- Lastly, we recommend braided funding techniques not include Title VI Indian Education.

The Tribal Education Departments National Assembly is a national membership non-profit organization whose mission is to represent Tribal Education Departments/Agencies as they exercise education sovereignty within their respective tribal jurisdictions. All comments enclosed are intended to increase collaboration with TEA/TEDs; however the absolute priority is to maintain a distinct channel of communication and consultation with all tribal elected officials and foster a continued collaborative framework.

We applaud the Muscogee (Creek) Nation in conjunction with the Inter-Tribal Council of the Five Civilized Tribes of Oklahoma and Oklahoma State Department of Education for collectively hosting an informational workshop for the Every Student Succeeds Act (ESSA) on Wednesday, April 5, 2017 at the River Spirit Casino Resort in Tulsa, Oklahoma. This workshop was designed to educate and encourage culturally responsive instruction and strengthen the collaboration of tribal nations and public education leaders while gathering input on how to continuously refine and improve programs that affect Indian education at all levels.

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<sup>5</sup> Page 104 refers to Section I(1)(4) implementing (722(g)(1)(F) "Access to Services" of the McKinney-Vento Act

<sup>6</sup> Page 22 refers to Section A(1) implementing ESEA section 1111(b)(1) and (2) and 34 CFR §200.1-200.8 "Challenging State Academic Standards and Assessments"

<sup>7</sup> Page 24 refers to Section A(3)(ii) implementing ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii)

<sup>8</sup> Page 78 refers to Section D(2) implementing ESEA section 2101(d)(2)(E) "Use of Funds to Improve Equitable Access to Teachers"

TEDNA remains cognizant of the amount of time and work that goes into crafting a consolidated state plan; we are ultimately encouraged by the opportunity to provide feedback and understand not all recommendations are immediately feasible; however incorporating any one recommendation is a step in the right direction. We fervently believe that increasing coordination with tribal nations is beneficial to the academic achievement of all students; especially our Native American students.

**Respectfully,**

A handwritten signature in blue ink that reads "Gloria E. Sly". The signature is fluid and cursive, with the first name "Gloria" being the most prominent part.

Gloria Sly  
President, TEDNA

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