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**January 11, 2018**

ATTN: Kate Mullan, Acting Director  
Information Collection Clearance Division  
United States Department of Education  
400 Maryland Avenue SW., LBJ Room 216-42  
Washington, D.C. 20202-4537

**RE: Docket ID ED-2017-ICCD-0083**

### **To Whom It May Concern:**

The Tribal Education Departments National Assembly (TEDNA) respectfully submits necessary comments on the Federal Register Notice #ED-2017-ICCD-0083 soliciting comments regarding the “Study of the ESEA Title VI Indian Education LEA Grants Program”:

The intent and scope of the proposed study is ultimately unclear regarding how said study will ensure accuracy and proper methodology. Acknowledging the intent to gather consistent information beyond current federal data collections, TEDNA recommends this study:

- Ensure results are consistent with the statutory intent of 20 U.S.C. 7421 Section 6111, to “(1) meet the unique cultural, language, and educational needs of such students; and (2) ensure that all students meet the challenging State academic standards”:
  - It is a function of the Title VI program to work in coordination with *all other* Title programs in the ESEA to ensure that students meet the challenging State academic standards, therefore, to accurately measure that would require the Department to
  - Review the Local Education Agency (LEA) allocation and treatment of Title VI funds to ensure supplementing and not supplanting any and all other Title responsibilities; and
- Ensure longitudinal methodology review of Title VI in correlation to all other Titles:
  - Title VI must be implemented in conjunction with all other educational plans (Local and State comprehensive plans) in order to assure that the unique culturally related academic needs of Native students are met. However, since many State comprehensive plans have not yet been approved by the Department, it seems premature to attempt this study, since there is inadequate data available to correlate Title VI project objectives to State plans that are currently not approved and not yet implemented; and
- Disregard the use of State summative assessments as adequate measure of progress towards Title VI project objectives: TEDNA is concerned that the Department’s study currently appears to rely on a narrow view of student achievement that is inconsistent with the cultural purpose of Title VI; and

- Ensure that adequate sample sizes consider the various types of Title VI grantees throughout the United States (rural, urban, on/off reservation); and
- Ensure proper cross-tabulation and consistent identification of AI/AN students across various Title programs:
  - Various Title programs that serve AI/AN students have different eligibility and identification criteria. The study methodology must consider proper identification of AI/AN students across all programs in order to examine how grantees align and leverage Title VI-funded services with those funded by other federal, state, and local sources; and
- Review the inclusion of AI/AN Parent Advisory Committees (PACs) and Tribal Governments during the development of all Title applications prior to submission; and
- Should be vetted through Tribal Consultation; and
- Ensure that Native researchers who are familiar with and have extensive experience in Native communities are participants in the study development, implementation, and analysis.

TEDNA 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 TED/TEAs; however the absolutely priority is to maintain a distinct channel of communication and consultation with all tribal elected officials and foster a continued collaborative framework.

TEDNA remains cognizant of the amount of time and work that goes into crafting a program study; 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,**




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cc: Kate Mullan, Acting Director, Information Collection Clearance Division  
Tara Ramsey, Acting Director, USDE Office of Indian Education  
Sam Morseau, President, TEDNA  
Laurie Harper, Vice-President, TEDNA  
Julian Guerrero, Associate Director, TEDNA  
2018 TEDNA Board of Directors, Listserv

## Your comment was submitted successfully!

The Department of Education (ED) Notice: Study of the ESEA Title VI Indian Education LEA Grants Program

For related information, [Open Docket Folder](#) 

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#### Comment:

Comments submitted on the behalf of Tribal Education Departments National Assembly, Co. (TEDNA); please see attached comments in PDF;

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