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Report to Sen. Robert C. Byrd, Chairman, Senate Committee on Appropriations: Interior Subcommittee; by Elmer B. Staats, Comptroller General.

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Congressional Relevance: Senate Committee on Appropriations: Interior Subcommittee. Sen. Robert C. Byrd.

Authority: Education for All Handicapped Children Act (P.L. 94-142). Elementary and Secondary Education Act, title I. Johnson-O'Malley Act of 1934.

The purpose of the Indian Education Resources Center in Albuquerque, New Mexico, is to provide technical services of monitoring, curriculum evaluation, research and development, and dissemination of information to Bureau of Indian Affairs (BIA) schools. The Center has four divisions in Albuquerque and one in Utah. In June 1976, the current Director of Indian Education initiated a reorganization which divested the Center of many of its functions and attempted to centralize staff and operations in Washington, D.C. This proposed reorganization has not taken place, and a 1976 Civil Service Commission review found that about half of the Center's personnel positions were overgraded due to an erosion of duties and responsibilities largely attributable to a gradual reduction in staff and funds assigned to the Center. The Commission directed BIA to take no further actions to reorganize the Center. Findings/Conclusions: Assistance provided by the Center was generally considered satisfactory by its clientele--mostly BIA field offices and schools. However, the Center was not, on its own initiative, monitoring and evaluating BIA-operated schools or insuring that area offices were adequately performing these functions. Additional needed services such as the monitoring and evaluation of school activities have not been provided because of staffing problems or travel fund limitations. Two of the Center's four divisions currently located in Albuquerque are appropriately located, but there is no reason why the Center's other two divisions need to be located in Albuquerque. However, if these two divisions perform additional monitoring and evaluation, they also will have to perform more travel and may need to be located in the field. (RRS)

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REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

RELEASED
2/27/78

Information On Organization And Functions Of The Indian Education Resources Center

The assistance provided by the Indian Education Resources Center is considered generally satisfactory by its clientele--mostly Bureau of Indian Affairs field offices and schools. However, Center officials and the Director of Indian Education said that the additional needed services, such as monitoring and evaluation of school activities, have not been provided because of staffing problems and/or travel fund limitations.



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Robert C. Byrd
Chairman, Subcommittee on the Department
of Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

In an August 9, 1977, letter, you requested that we make a comprehensive review of some of the Bureau of Indian Affairs (BIA) programs and processes and report to you by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our examination of the Indian Education Resources Center (Center) in Albuquerque, New Mexico. More specifically, in accordance with agreements reached with your office, this report addresses

- what the Center is supposed to do,
- the Center's accomplishments, and
- the need for the Center to be located in Albuquerque.

A detailed discussion of these matters for each of the Center's five divisions is included in appendix I.

ORGANIZATION AND FUNCTIONS OF THE
INDIAN EDUCATION RESOURCES CENTER

The Center is one of several BIA central office organizations located in Albuquerque, New Mexico, and is part of the Office of Indian Education whose Director is in Washington, D.C. The Director is responsible for providing staff support to the Assistant Secretary for Indian Affairs, Department of the Interior, in developing and managing BIA programs that provide educational opportunities to Indian youth and adults in BIA, public, or private schools. The Director is also responsible for the operations of three BIA post-secondary institutions. The Assistant Secretary of Indian Affairs administers the education programs at other BIA-operated schools through 12 BIA area offices.

The Office of Indian Education can also provide technical and supportive assistance directly to area offices, schools, and other BIA field offices.

The Center has four divisions in Albuquerque--Education Evaluation and Research; Continuing Education; Educational Assistance; and School Facilities. Another division, Educational Audio-Visual Services, is located in Brigham City, Utah. The overall purpose of the Center is to provide technical services of monitoring, curriculum evaluation, research and development, and dissemination of information to BIA schools.

At the time of our review the Washington central office of education was staffed with 16 permanent and five temporary employees and had two employees on detail from area offices and three employees on detail from the Center's Division of Continuing Education. The Center had 34 filled permanent and 13 temporary positions in Albuquerque including the three employees on detail to Washington. In addition, the Center had five filled permanent and five temporary positions in Brigham City. The Center's Administrator was at Princeton University attending the Education Program for Federal Officials at Mid-Career, and the Chief, Division of Education Evaluation and Research, was at the University of New Mexico on the Intergovernmental Exchange Program. They both will be gone for the entire 1977-78 school year leaving their subordinates to fulfill their duties. At the time of our examination in November, the Center had 52 people in Albuquerque and Brigham City as follows:

	<u>Permanent</u>	<u>Temporary</u>
Office of the Administrator	1	1
Divisions:		
Education Evaluation and Research	8	3
Continuing Education	3	1
Educational Assistance	8	3
School Facilities	9	5
Audio-Visual Services	<u>5</u>	<u>5</u>
Total	<u>34</u>	<u>18</u>

In June 1976 the current Director of Indian Education initiated a reorganization which divested the Center of many of its functions. When we began our review in September 1977, the Director told us that he wants most of the Center's staff and operations returned to Washington. He believes he can better control central office functions by having daily, face-to-face contact with his staff. Also, he said that requests for information from the Congress and executive branch agencies could be handled more quickly by having the Center's staff--who have most of the central office experience and expertise needed to respond to questions--located in Washington.

However, the proposed reorganization has not taken place. In the fall of 1976 the Civil Service Commission made a review of personnel management at the Center. Its report concluded that about half of the Center's positions were overgraded due to an erosion of duties and responsibilities, largely attributable to a gradual reduction in staff and funds assigned to the Center over the previous 2 years. The Commission directed BIA to take no further action to reorganize the Center until

- functions to remain at the Center and those to be assigned to Washington were specifically identified,
- appropriate regulatory procedures for the reorganization were determined, and
- current Center positions were accurately described.

The Center rewrote the position descriptions, which are now being reviewed by the Division of Personnel Management before any decision to downgrade.

Also, in October 1977 the Assistant Secretary for Indian Affairs indicated that he wanted a total reorganization of BIA rather than a piecemeal reorganization of just education areas. The Secretary of the Interior subsequently appointed a task force to study the current organization and make recommendations by February 1978. According to the Director of Indian Education, no reorganizations can be made until the study is completed.

ACCOMPLISHMENTS OF THE CENTER

Officials of the four area offices and the 23 BIA schools we visited indicated they were generally satisfied with the services the Center provided to them. However,

some of them indicated that the Center should do more. They said many times they requested Center services but received no assistance. For example, the Navajo area office requested that the Center help it develop a needs assessment program to determine types of staffing and facilities required at area schools. However, the Director said that the Center's staff did not perform the requested assessment because it was performing higher priority work. Examples of Center activities are:

- A staff member served as coordinator of a task force overseeing the transfer of some schools from BIA to the State of Alaska.
- Technical assistance for Johnson-O'Malley 1/ and Title I of the Elementary and Secondary Education Act (ESEA) 2/ was provided to area offices and schools.
- A study was made of the impact Public Law 94-142 3/ will have on BIA's educational efforts and financial structure.
- The Center trained school staff members to use new and unfamiliar equipment.
- Films were provided to schools for classroom teaching, vocational instruction, and teacher training.

Detailed discussion of the Center's accomplishments are included in appendix I.

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- 1/The Johnson-O'Malley Act (JOM) provides money for Indian students going to public schools on or near reservations. Some JOM moneys are for basic education but most are for supplementary programs such as Indian culture courses, summer courses, and teacher aides.
 - 2/Title I of the Elementary and Secondary Education Act (ESEA) authorizes moneys to meet the needs of educationally deprived students from low income families. Most of the moneys go for remedial reading, language arts, and mathematics programs.
 - 3/The Education for All Handicapped Children Act (P.L. 94-142) provides funds to assure that all handicapped children receive a full, appropriate, public-supported education in the least restrictive environment possible.

Center officials, in general, stated that they were not as effective as they could have been in fiscal year 1977. They stated that travel fund restrictions and staffing problems, mostly related to the proposed reorganization of the Office of Indian Education, have prevented them from performing more effectively.

Regarding the effectiveness of the Center, in our April 27, 1972, report, "Opportunity to Improve Indian Education in Schools Operated by the Bureau of Indian Affairs," (B-161468) we recommended, among other things, that BIA develop a comprehensive education program, periodically evaluate program results, and develop a management information system including program-oriented financial management reports. In our January 17, 1977, report "Concerted Effort Needed to Improve Indian Education," (CED-77-24) we repeated these recommendations because we found that the problems identified in 1972 still existed and that BIA had not taken appropriate action to implement the recommendations.

In December 1976, we were told that BIA was planning to begin monitoring and evaluating Indian education programs and that it would develop a management information system as an essential part of monitoring and evaluation.

During our current review, however, we found that the Center was not on its own initiative monitoring and evaluating BIA-operated schools or insuring that area offices were adequately performing these functions. We also found that area office administration of contracts authorized by the Johnson-O'Malley Act were not being reviewed on a regular basis because of staff and travel limitations. The Center has been slow in developing a management information system that could be useful in performing monitoring and evaluation. In addition, it had no procedure to systematically review the information used in establishing priorities for construction of BIA-operated and contract schools. This latter item is discussed in detail in another report, "Questionable Need for All Schools Planned by the Bureau of Indian Affairs," done in response to your August 9, 1977, request.

The Center has upon request of area offices conducted evaluations of BIA-operated schools. In a few instances it has been directed to perform evaluations for specific purposes. However, the Office of Indian Education, including the Center, does not have any procedures to assure that each BIA-operated school is periodically evaluated. Center

officials said that responsibility for developing and implementing such procedures has not been specifically assigned to the Center, but they believe that since the Center is the field organization within the Office of Indian Education, it should perform such functions.

Center officials further indicated that before detailed evaluations are made, a monitoring system to identify problem areas is needed. The Center has been in the process of developing a comprehensive management information system for some time, but Center officials agreed that progress has been slow. According to an April 15, 1976, Center publication, the planned system for BIA school operations includes nine subsystems, three of which were considered operational at the time. These were (1) collection of information on noneligibles attending BIA schools, (2) financial information, and (3) student enrollment. Since then only one Center professional staff member has been assigned to work on developing the management information system, and he has been concentrating on operating the systems for information on noneligibles and student enrollment and making them more reliable.

Also, there is some controversy as to whether BIA's overall financial information system is adequate to serve education program needs. The planned system for monitoring Johnson-O'Malley contracts is even less developed than the system for BIA school operations.

The Director of Indian Education agreed that monitoring and evaluation of BIA education programs is needed. He stated, however, that restrictions on travel budgets for the last 2 fiscal years have left only enough funds to respond to crisis situations. In fiscal year 1977 BIA requested \$10,650,000 for travel for operation of all Indian programs. This amount was cut by \$500,000 to \$10,150,000. In fiscal year 1978 the travel budget was cut to \$9,630,000. This included a \$750,000 cut in the administrative travel budget. We were told by financial officials that the Indian education travel budget includes student transportation, such as daily bussing and transporting students back and forth to boarding schools. We were advised that priority is given to this type of transportation, so cuts have been made elsewhere, such as central office travel including the Center. The Center and the Office of Indian Education budget is \$240,000 and, as of January 1978, \$125,000 had already been spent.

LOCATION OF THE CENTER

On the basis of the Center's activities in fiscal year 1977 we believe that two of the four Center's divisions currently located in Albuquerque are appropriately located in the field because they either conduct extensive travel in nearby areas or deal repeatedly with other BIA offices located in Albuquerque. We can see no need for the remaining two divisions to be located in Albuquerque. However, we believe that if BIA assigns monitoring and evaluation functions to the Center, the remaining two divisions will probably also have extensive travel requirements and therefore would also have a need to be located in the field.

We were told by officials working at the Center that the Divisions of Educational Assistance and School Facilities were moved from Washington to Albuquerque in 1968. In 1971 the Division of Education Evaluation and Research and the Division of Continuing Education were moved to Albuquerque, at which time the Center was formally established. The reason for locating central office divisions in Albuquerque was to serve Indians more effectively and economically. About two-thirds of the Indian students are within 2 hours by ground or air transportation from Albuquerque, and being located there as opposed to Washington would tend to provide easier access to most BIA schools and to reduce travel costs. Other considerations were (1) the Administration's efforts to reduce the number of Federal workers in Washington and (2) the existence of many other BIA central office functions in Albuquerque.

We found that the Center's travel for the four divisions located in Albuquerque, discounting trips to Washington by staff members who were detailed to the central office for matters not specifically related to the Center, were as follows.

<u>Division</u>	<u>Percent on travel</u>	<u>Number of trips</u>
Education Evaluation and Research	17	116
Continuing Education	22	86
Educational Assistance	35	150
School Facilities	26	117

Though the Division of School Facilities did not travel much more than two of the other three divisions, in planning school construction it worked closely with the Division of Facilities Engineering, located in Albuquerque, and would have to make many trips to Albuquerque if it were moved. A BIA study of travel during 1975 showed that \$56,000 was saved during that year by traveling from Albuquerque to various field locations as opposed to traveling from Washington, D.C., to the same points.

We discussed our findings on the extent of past travel and possible future travel with the Director of Indian Education. He agreed that the Divisions of Educational Assistance and School Facilities should remain in Albuquerque. He also agreed that the Division of Audio-Visual Services should remain in a central field location in order to minimize mailing time of films that are sent back and forth to field locations. He still believed that the Division of Education Evaluation and Research and the Division of Continuing Education should return to Washington because he can better control central office functions by having face-to-face contact with his staff. He further stated that under his reorganization, these divisions would have limited travel because they would not be doing monitoring and evaluation functions. Although he agrees that such functions are needed, he is proposing that evaluations be made by contract and monitoring be done from the central office in Washington.

CONCLUSIONS

Assistance provided by the Center is generally regarded as satisfactory by its clientele--mostly BIA field offices and schools. However, we have previously reported, and school and Center officials have stated, that the Center could do more to improve the education provided to Indian children. Center officials and the Director of Indian Education said that the additional needed services, such as monitoring and evaluation of school activities, have not been provided because of staffing problems and/or travel fund limitations.

On the basis of recent travel, we believe two of the divisions should remain in Albuquerque, but we can see no reason why the Center's other two divisions located in Albuquerque need to be there. However, if these two divisions perform additional monitoring and evaluation, they also will have to perform more travel and may need to be located in the field.

SCOPE OF REVIEW

We reviewed the workload and travel of the four divisions of the Center located in Albuquerque by focusing primarily on their activities during fiscal year 1977. We also reviewed what each division was supposed to do, factors preventing them from being more effective, justifications for having the divisions at field locations, and the need for what the division may or may not be doing. We visited the Albuquerque, Phoenix, Aberdeen, and Navajo area offices and contacted 23 BIA schools to determine their views of the Center's services provided in recent years. Since the Center is an integral part of the Office of Indian Education in Washington, we visited the office to obtain the Director's views toward the Center. We examined (1) studies and reports related to Indian education generally and the Office of Indian Education specifically, (2) reorganization plans concerning the Office of Indian Education, and (3) policies and procedures applicable to the Center.

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At the request of the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, we did not submit this report to the Department of the Interior for formal review and comments. However, responsible agency officials were provided copies of the report and their informal comments have been considered.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others on request.

Sincerely yours,



Comptroller General
of the United States

ACTIVITIES OF THE INDIAN EDUCATION RESOURCES CENTERDIVISION OF EDUCATION
EVALUATION AND RESEARCHMission and staffing

According to Center officials, the mission of the Division of Education Evaluation and Research, is to

- coordinate the evaluation and review of education programs that provide information to effect long-range or immediate improvement in programs;
- coordinate the development and review of new and innovative education programs;
- provide consultative services to area offices, agencies and schools;
- maintain a continuing study on developments of media and materials used in education programs; and
- make recommendations on school policy.

During fiscal year 1977 nine professional staff members were permanently assigned to the Division. The Chief of the Division was detailed to the central office for over 3 months in fiscal year 1977. Beginning in September 1977 the Chief went on an Intergovernmental Personnel Act assignment for 1 year at a university. A key staff member spent about half of fiscal year 1977 on administrative matters such as writing position descriptions in response to the Civil Service Commission recommendations, doing work related to the reorganization of the central office, and serving as Acting Division Chief. Also, although the student enrollment system could be operated by a lower graded staff member, a GS-14 has continued to operate the system because the Division cannot obtain additional staff members. This prevented the GS-14 from working on developing a management information system which would include student attendance and curriculum data.

Accomplishments

Members of the Division had a wide range of assignments that involved working on special projects, evaluating education programs, and providing technical assistance. Evaluation and technical assistance activities are done only on request--usually the request of an area office.

Some of the Division's more significant activities and accomplishments during fiscal year 1977 were the following:

- A staff member served as coordinator of a task force overseeing the transfer of some schools from BIA to the State of Alaska.
- A staff member refined and operated BIA's student enrollment system. Operation of the system involved monitoring the data received from BIA schools, forwarding the data to the computer center in Albuquerque, and providing technical assistance to areas on how to submit the information properly.
- A staff member served as project coordinator for the school management options concept. He was responsible for providing technical assistance and training to areas regarding the school options tribes have (such as keeping a BIA-operated school or converting it to a contract, cooperative, or public school).
- A staff member reviewed the student rights and responsibilities codes submitted by schools to insure that the codes conformed to Federal regulations and compiled a report of statistics from schools in response to a Center questionnaire about use of procedures provided under the codes.
- A staff member served as chairman of the student records task force responsible for developing the regulations and procedures governing the maintenance and control of student records in BIA schools.

--A staff member worked on nondiscriminatory testing which involved researching the subject, providing technical assistance at workshops, and reviewing a contract proposal.

Staff members also performed evaluations of several contract schools; served as contracting officer representatives on large contracts; provided technical assistance to schools in such areas as needs assessments, bicultural arts, mathematics, and safety; and coordinated the funding of bilingual programs. The Division served as a repository for research and development reports, which are a record of any significant activity accomplished by a staff member. The Division sent these reports, Center research and news bulletins, and other written information to area offices and other interested parties.

Some of the Division's more significant activities in past years included:

1972--Developed a design for a BIA-wide education needs assessment, studied the off-reservation boarding school concept, and described a way to develop a data base for providing information needed to evaluate BIA education programs.

1973--Evaluated the Intermountain Boarding School in Brigham City, Utah, to determine the school's future role.

1974--Evaluated the San Juan, New Mexico, Day School.

1975--Evaluated the American Indian Administrator Training Program at three universities and the Choctaw, Mississippi, school system's career education program. The Division also developed guidelines for the use of the test of proficiency in English as a second language.

1976--Conducted an Indian education needs assessment covering most of Oklahoma.

Responses from area offices and officials of the 23 schools we visited indicated that the Division provided more services before than in fiscal year 1977. The

officials indicated, that generally they were satisfied with the assistance provided by the Division.

Center officials said that several factors prevented them from providing more assistance during 1977, including

--diversion of key personnel to other pursuits, and

--lack of sufficient travel funds.

Travel

Most of the Division's 1977 assignments entailed work at the Center, the areas, or the central office of education in Washington. Discounting trips to Washington by the Chief of the Division when he was detailed to the central office, members of the Division traveled an average of 17 percent of the time during fiscal year 1977. This represented 116 trips, 23 percent of which were made to Washington.

Several staff members indicated that during fiscal year 1977 they could not respond to requests for visits to the field because of limited travel funds. Restrictions on the travel budget left them with only enough funds to respond to crisis situations. Fiscal year 1977 travel for operation of all Indian programs was cut \$500,000 below the requested amount to \$10,150,000. According to BIA financial officials the travel budget includes student transportation, such as daily bussing and transporting students back and forth to boarding schools. Priority is given to this type of transportation, so cuts have been made elsewhere, such as central office travel including the Center.

The situation has not improved in fiscal year 1978 because administrative travel has been cut an additional \$750,000 and because a large portion of the Center's travel budget has already been diverted to a single project undertaken by a staff member in the Division of Education Evaluation and Research. This project, WAMPUS-77, was an Indian music festival presented by Indian students from all parts of the country at a National Football League game in Washington, D.C.

Personnel of this Division did not travel a significant portion of the year. However, if travel funds are made available and the Division is assigned responsibility to make self-initiated evaluations of school operations as we recommended in our 1972 and 1977 reports, more travel will have to be done which would be more economical if the Division remains in the field.

THE DIVISION OF CONTINUING EDUCATION

Mission and staffing

According to Center officials, the mission of the Division is to

- coordinate the higher education scholarship, adult education, and vocational training activities for BIA;
- provide interagency liaison between BIA and other agencies with post-secondary programs;
- assist in the development of programs for handicapped students; and
- in areas of concern make recommendations on policy, provide technical assistance to area offices, and review program effectiveness.

The Division Chief informed us that the Division's workload and travel during fiscal year 1977 were not typical of previous years. The main reason for this was that the reorganization efforts by the Director of the Office of Indian Education probably affected the Division of Continuing Education more than any other Center division. Responsibility for a career development project had been transferred to Washington before the beginning of the fiscal year. During the year the higher education program and some of the responsibility for special education of the handicapped were transferred to new divisions in Washington, and three of the six professional staff members assigned to the Division were detailed to Washington for periods of 4 to 8 months.

Accomplishments

The Division's major activity during fiscal year 1977 was in the area of special education of the handicapped. On November 29, 1975, the Education For All Handicapped Children Act (P.L. 94-142) was enacted. The act provides funds to assure that all handicapped children receive a full, appropriate, public-supported education in the least restrictive environment possible. Public Law 94-142 extends the existing funding formula to States set forth under P.L. 93-380 for the 1976 and 1977 fiscal years. The Division's effort in this area centered around the new requirements imposed on BIA by Public Law 94-142 in the development of BIA's special education plan.

Until 1973 BIA spent less than \$120,000 per year on handicapped students, using discretionary funds received from the Department of Health, Education, and Welfare (HEW). With the passage of Public Law 93-380 on August 21, 1974, BIA became a conduit, like State education agencies, through which Part B of the Education For All Handicapped Children Act moneys from HEW to the schools would flow. An advance funding system was set up whereby in fiscal year 1974 BIA applied for fiscal year 1974 funds for expenditure in fiscal year 1975. The Division has continued to use this advance funding system, and expenditures per year have increased from about \$700,000 in fiscal year 1975 to an estimated \$1.9 million in fiscal year 1978.

Under Public Law 94-142 the requirements for receiving funding beginning in fiscal year 1978 increased significantly, and fiscal year 1979 expenditures may exceed \$3 million. As a result of the law, BIA schools must identify, locate, and evaluate handicapped children residing within their jurisdiction and provide programs to meet their educational needs. The BIA must have special education administrators and teachers, counseling and guidance personnel, psychologists, and other specialists. The BIA Office of Indian Education must provide technical assistance to the schools and must monitor area offices and schools.

Beginning in September 1976 the Division began apprising the Director of Indian Education of the new requirements under Public Law 94-142. The Division

- requested three additional special education positions,
- submitted a statement on the laws' impact on educational efforts and financial structure of the BIA,
- submitted for comment a proposed design for a data base for handicapped children under BIA's educational jurisdiction, and
- as a followup to a letter sent by the Division to area offices, requested that a telegram from the BIA Commissioner be sent to the area offices, directing them to furnish information needed to comply with the new law.

In a letter to the Director of Indian Education in July 1977, the Division pointed out that it had received no response from the Director on the above listed items concerning new requirements under Public Law 94-142.

The Director of Indian Education stated that, in April 1977, he transferred responsibility for part B of the Education For All Handicapped Children Act's special education program to a new Division in Washington. The Director stated that this transfer was made because he was having problems getting the Department of Health, Education, and Welfare to fund the special education program. He thought he could better deal with this problem if he had the responsible division in Washington.

Since the Division Chief did not believe fiscal year 1977 was typical of previous years, we identified some significant Division activities that occurred before fiscal year 1977:

1974--Leadership and coordination were provided in establishing a program for deaf-blind Indian children and a special education resource center at the Navajo Reservation. A draft position paper on career education and guidelines for implementation of career education in BIA schools were developed and distributed for area office use in developing career education materials.

1975--An adult education workshop was conducted that resulted in a preliminary definition of "adult education" as the term would be used in BIA. The request for proposal for the evaluation and training component of two pilot career development center projects was distributed.

1976--An indepth study of the special needs of Indian children was made which resulted in the implementation of recommendations made by the North American Indian Women's Association. The Division, through its work with the Southwest Area Learning Resource Center, helped establish a resource center for the Northern Pueblos and proposed a center at Pine Ridge, South Dakota.

Responses from area offices and schools indicated that the Division had provided few services. Some functions, however, such as higher education assistance and adult and vocational education, require little or no direct contact with schools. Most of the schools that received services were satisfied with the services provided.

Travel

Discounting trips to Washington by three Division staff members when they were detailed to the central office, members of the Division traveled an average of 22 percent of the time during fiscal year 1977. This represented 86 visits 13 percent of which were to Washington. The bulk of the travel was performed by the Division Chief and one staff member and was primarily

related to the new requirements under Public Law 94-142. This entailed attending meetings and workshops held by groups within BIA and professional organizations outside the Federal Government and providing technical assistance to the areas.

While some of the Division's functions can be more effectively and efficiently performed in the field, such as technical assistance to schools in implementing special education programs and monitoring and evaluating the programs, on the basis of the limited amount of past travel and the Division's recent workload, we can see no reason why the Division must be in a field location.

THE DIVISION OF EDUCATIONAL ASSISTANCE

Mission and staffing

According to Center officials, the mission of the Division is to

- coordinate the funding of JOM programs and HEW programs operated by BIA;
- assist in the development of plans of specific services to Indian students using JOM or HEW flow-through moneys; and
- provide for development, administration, and monitoring of HEW-funded programs.

Under the Johnson-O'Malley Act, BIA provides money for eligible Indian students going to public schools on or near reservations. Some JOM moneys are for basic education but most are for supplementary programs, such as Indian culture courses, summer courses, and teacher aides. The Division annually allocates JOM moneys to the area offices, who channel the moneys to the schools through contracts with Indian groups at the public school district level.

Title I of the Elementary and Secondary Education Act (ESEA) authorizes moneys to meet the needs of educationally deprived students from low-income families.

Most of the moneys go for remedial reading, language arts, and mathematics programs. BIA is responsible for the Title I programs at BIA-operated and contract schools and for portions of programs at public schools with BIA dormitory students. All Title I programs are funded by HEW on an annual basis, and the Division reviews the project applications and amendments and passes the HEW moneys through to the schools. Funding of the Title IV programs is handled similarly.

During fiscal year 1977 six professional staff members were permanently assigned to the Division. The Division Chief and one staff member were responsible for the JOM programs, while the remaining four staff members were responsible for Elementary and Secondary Education Act (ESEA) Title I programs funded by HEW. The Division Chief was also responsible for programs under Title IV of ESEA, but he spent most of his time with the JOM programs.

Accomplishments

Other than coordination of JOM and HEW programs, major Division activities and accomplishments during fiscal year 1977 were the following:

- Technical assistance for JOM and title programs was provided to area offices and schools.
- Area offices and some programs at the schools were monitored to insure area office compliance with HEW requirements. HEW requires BIA monitoring of title programs at least once a year, and this function has been delegated to the area offices.
- At the request of the Director of the Office of Indian Education a JOM issue paper was drafted which described several problems in the program and offered recommendations.
- On the basis of congressional interest in how BIA allocates JOM moneys to the areas, three alternate JOM funding formulas were devised. The Director of Indian Education subsequently selected one.

--Coordination, technical assistance, and participation were provided in the development of several Title I films.

Responses from area offices and schools indicated that the Division has provided needed and valuable services. The Chief of the Division, however, acknowledged that his division did not perform all of the services it should have. He stated that since 1972 the number of JOM contracts increased from 27 to 233 (most of the increase coming in the last 2 years), while the number of JOM positions in the Division decreased from three to two. The Chief of the Division stated that this plus limited travel funds have resulted in little monitoring of JOM activities.

Travel

Both the JOM and title programs entailed extensive travel. Members of the Division traveled 35 percent of the time during fiscal year 1977. This represented 150 visits 13 percent of which were to Washington. Over two-thirds of the visits were to sites in the western United States. Travel on behalf of JOM programs was funded by BIA, while travel on behalf of title programs was funded by HEW.

The Division Chief and a staff member responsible for JOM programs informed us that their workload during fiscal year 1977 was not typical compared with previous years. This resulted from limited travel funds which often prevented them from responding to requests for visits from the field. Staff members responsible for Title I programs said their workload and travel were generally representative of previous years.

The location of the Division seems to be appropriate because of the extensive travel done in the past and possible future travel increases.

THE DIVISION OF SCHOOL FACILITIESMission and staffing

According to Center officials, the mission of the Division is to

- develop long-range plans, including a priority list, and education specifications for school construction;
- develop criteria for the management of school space;
- procure school equipment;
- participate in selection of school sites; and
- train school staff members to use new and unfamiliar equipment.

The staff is composed of nine permanent members and five temporary ones. One professional staff member has been on disability leave since October 1976.

Accomplishments

Most of the work of the Division is generated in response to requests for school construction. When a request is received the Division considers whether the size of the school is in accordance with the demography of the community to be served, whether the school boundaries infringe on other school districts, and whether other schools are available.

After determining that the proposed school is needed, the construction project is assigned a priority for funding. Just prior to the time funding is requested, the Division develops an educational specifications package which describes in detail the education program for the school. It compares the architectural design to the specifications to insure that the design will provide what is needed. The expertise of the Division is particularly needed because BIA, unlike public school officials,

does not restrict architectural bids only to architects who specialize in designing schools. The Division determines whether the design has the necessary kinds of space required for the education programs. Before construction begins the Division meets with school boards and other interested parties to insure that all involved are satisfied that the specifications and design meet the needs of the education program.

At this point the Division determines equipment requirements and cost. The Division works closely with the General Services Administration, and again meets with all interested parties. The Division is responsible for the equipment until it is in place and provides equipment training not already covered by the contractor.

Throughout much of its work the Division must coordinate closely with the Division of Facilities Engineering in the BIA's Office of Administration. Facilities Engineering is also located in Albuquerque and is responsible for contracting for all BIA facilities.

Responses from area offices and schools generally indicated that the Division of School Facilities has provided useful services and will be requested to provide services in the future. In our concurrent review of BIA school construction planning, however, we concluded that the Division should more carefully verify the justifications received for school construction since some are not justified under BIA criteria. Proper performance of this function would make the Division more effective.

Travel

In performing its function the Division must frequently visit school sites, most of which are in the western United States. During fiscal year 1977, the seven professionals and two technicians assigned to the Division, traveled frequently according to travel records.

The Division should remain in the field because of the needed travel which would be more costly if performed from Washington and because it must work closely with Facilities Engineering.

THE DIVISION OF EDUCATIONAL
AUDIO-VISUAL SERVICES

The Division is located in Brigham City, Utah, and its association with the Center is mainly administrative. Although we considered the Division outside the scope of the Committee's request since it is not located in Albuquerque, we briefly reviewed the mission and activities of the Division.

The mission of the Division is to

--provide BIA education programs with films for classroom teaching, vocational instruction, and teacher training, and

--plan and produce visual materials for use in BIA's education and other programs.

The Division has five full-time and five temporary staff members. It has about 7,000 to 8,000 films which are used at BIA-operated and contract schools and at public schools receiving Johnson-O'Malley moneys. The Division produced only a small percentage of the films it stored and distributed. Most of the films were selected from hundreds of education film producers outside BIA. A catalog listing the films stored at the Division is sent to all schools. The bulk of the requests for films for the following school year arrives during the summer. The Division makes about 40,000 shipments of films per year, and BIA-operated and contract schools are given first priority. The Division contracts for film development services but performs all other aspects of production itself.

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