



## NAVAJO PREPARATORY SCHOOL

Yideeskáágóó Naat'áanii: Leaders Now and into the Future

July 24, 2025

***Via Email: [consultation@bia.gov](mailto:consultation@bia.gov)***

U.S. Department of the Interior  
Office of Planning and Performance Management  
1849 C Street NW  
Washington, D.C. 20240

### **Re: Tribal Comments on DOI FY 2026–2030 Strategic Plan**

Dear Secretary Burgum and Strategic Planning Team:

On behalf of the Navajo Preparatory School, I write to provide the following comments regarding the Department of the Interior's draft FY 2026–2030 Strategic Plan, as discussed during the tribal consultations held in June 2025. We appreciate the opportunity to provide input and respectfully offer the following recommendations to ensure the Strategic Plan accurately reflects the federal government's trust and treaty responsibilities to Tribal Nations.

#### School Introduction:

Navajo Preparatory School Inc. (Navajo Prep) is a Tribally Controlled School funded by the Bureau of Indian Education (BIE) as per the Tribally Controlled Schools Act, P.L. 100-297. Located in Farmington, New Mexico, Navajo Prep is an example of Indian self-determination based on the Indian Self-Determination and Education Assistance Act (ISDEAA), P.L. 93-638. Navajo Prep serves as a *school of choice* for students from across all 110 Chapters of the Navajo Nation, which is the largest Tribal Nation both in land mass and Tribal enrollment in the United States. In addition to serving students from across the Navajo Nation, students attend from across the United States, including Colorado, Idaho, Montana, and South Dakota, and represent different Tribal Nations. Sixty-five percent of Navajo Prep students live on campus in the school's residential facilities.

As an International Baccalaureate World School, Navajo Prep serves 291 students in grades 9-12 and allows students to compete for a competitive international diploma. College education of our



Navajo youth is an expectation for Navajo parents and our Navajo leaders.<sup>1</sup> Since 2020, Navajo Prep has sustained a high school graduation rate of 94% or higher, significantly exceeding the 2020-2021 national average of 87% and the 74% average for American Indian/Alaska Native students<sup>2</sup>. 100% of our 2024 graduates were accepted into four-year colleges or universities and 90% enrolled in college within the first year of graduating from high school, compared to national college enrollment rates of just 39% overall and 26% for American Indian/Alaska Native students aged 18-24. Most remarkably 60% of our alumni from the Class of 2018 who pursued college graduated within six years, surpassing both the national average of 62% and significantly outperforming the 41% six-year completion rate for American Indian students nationwide.

One of Navajo Prep's priorities is to address the critical loss of Diné language and culture within the Navajo Nation. The Navajo Times estimates that only 51% of Navajo people spoke the Diné language in 2010. By 2040, it is estimated that less than 5% of Diné people will speak our language.<sup>3</sup> In this way, Navajo Prep addresses a specific need of the Navajo Nation and of American Indian students. Navajo Prep roots our students in language and culture and supports the development of their identity and status as Indigenous peoples and global citizens.

Despite its impact and success, Navajo Prep faces inadequate funding as Tribally Controlled Schools receive no designated funding for technology infrastructure, equipment, or management. Tribally controlled schools cannot draw on the local tax base, cannot issue bonds, and primarily rely on funding allocations from the federal government. Navajo Preparatory School Inc. recommends full, mandatory funding for BIE-funded schools. Reclassifying BIE funding from discretionary to mandatory will expand educational freedom and opportunity for American Indian students, protect BIE-funded schools and uphold the government's trust and treaty responsibility to American Indian education.

Our comments below focus specifically on critical issues affecting Bureau of Indian Education (BIE)-funded tribal schools, with an emphasis on safety, infrastructure, and education parity.

### **1. Strengthen Language to Reflect the Legal Status of Tribal Nations and Tribal Schools**

The draft plan must consistently reflect the government-to-government relationship with Tribal Nations and the unique federal obligations to tribal schools.

The draft plan insufficiently references the United States' unique legal and political relationship with Tribal Nations as "upholding sovereignty and self-determination for American Indian Tribes." This statement is incorrect. The sovereignty of Native American

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<sup>1</sup> Pedro Vallejo and Vincent Werito, *Transforming Diné Education: Innovations in Pedagogy and Practice* (University of Arizona Press, 2022); Wendy S. Greyeyes, *Disentangling Our Sovereign Body: A History of Navajo Education* (University of Arizona Press, 2022).

<sup>2</sup> National Center for Education Statistics. (2024). High School Graduation Rates. *Condition of Education*. U.S. Department of Education, Institute of Education Sciences. Retrieved [date], from <https://nces.ed.gov/programs/coe/indicator/coi>.

<sup>3</sup> Denetclaw, P. (2017, November 16). *Data shows huge reduction in Diné Speakers*. Navajo Times. <https://navajotimes.com/reznews/data-shows-huge-reduction-in-dine-speakers/>

tribes is an inherent right to self-governance and make their own laws, as confirmed by the United States Supreme Court.

The Department of the Interior’s objective is to fulfill the Treaty and Trust obligations of the United States to Tribal Nations by implementing federal programs and services. In addition, the Strategic Plan must consistently reflect the government-to-government relationship across all goals and objectives, not just Strategic Goal 4. Terms such as "states," "local governments," and “communities” must not be used as a proxy for Tribal Nations, which hold distinct constitutional status and legal rights.

We ask that the final plan:

- Distinguish tribal governments and tribal education systems as constitutionally recognized entities.
- Revising all references to tribal governments and BIE schools to reflect their legal status as federally recognized, sovereign governments and agencies.
- Reinforce that BIE schools are federal obligations—not discretionary programs—and must be treated with the same urgency as all other federally operated schools.
- Clearly distinguishing tribal schools from state and local education agencies throughout the plan.

## **2. Reform and Transfer Authority from DFMC to BIE for School Construction and Maintenance**

The Department’s Strategic Plan must reflect an urgent structural reform: the transfer of full authority for school construction and deferred maintenance from the Division of Facilities Management and Construction (DFMC), currently under the Office of the Deputy Assistant Secretary for Management, to the Bureau of Indian Education (BIE).

Tribes regularly face delays of 6–12 months or more from the time a project is offered to the time an award is processed. These delays inflate construction costs, jeopardize construction schedules, and result in underfunded and failed projects. Tribes and school boards also report a lack of meaningful consultation, and in many cases, a complete absence of communication unless the grantee is proactively engaged.

This recommendation is long overdue. Currently, BIE cannot directly oversee or execute school construction or major repair projects without clearance and coordination through DFMC, a process that is bureaucratic, opaque, and prone to significant delay.

As a result:

- Tribal 297 and 638 construction projects often stall for years awaiting approvals.
- Projects are not prioritized in accordance with local or cultural needs.
- BIE lacks the internal authority to resolve urgent safety deficiencies across its school system. We therefore recommend the following strategic commitments be included in the final plan:

- Transfer programmatic authority for tribal school construction and facilities maintenance from DFMC to BIE.
- Increase BIE’s internal authorization ceiling from \$5 million to \$250 million to align with current costs and allow for autonomous project execution.
- Provide necessary administrative funding to implement full-time career BIE facilities staff to manage school construction, modernization, and deferred maintenance.

These reforms would empower tribal schools to act quickly, responsively, and in alignment with their unique educational and community goals.

### 3. Tribal Schools Must Be Prioritized Across Strategic Goals—not Confined to Goal 4

The draft plan’s framework includes four overarching goals and thirteen objectives. While we recognize the inclusion of Objective 4.1 (“Uphold trust and treaty responsibilities”), the current structure inadvertently silos Tribal Nations and tribal schools. In reality, tribal education intersects with every strategic goal.

We recommend integrating tribal school priorities across:

- **Goal 1 (American Prosperity):** Recognize tribal schools as economic anchors in rural Native communities and invest in workforce readiness and culturally grounded STEM education.
  - Tribal schools also educate non-Indian students whose parents often work at our local schools.
  - Tribal schools house community members in staff quarters, including non-Indians as faculty and staff, which enhances our community cohesion.
  - Tribal schools are often the economic drivers in rural areas, providing essential jobs, including those for teachers, administrators, facilities staff, maintenance personnel, and coaches.
- **Goal 2 (National Security and Infrastructure):** Include tribal school facilities and broadband access as essential infrastructure.
  - Tribal schools no longer teach with pens, paper, and overhead projectors, yet we are funded as such. Modern-day education requires modern-day needs such as broadband, IT support, and network security.
- **Goal 3 (Natural Resources and Recreation):** Recognize the educational role that tribal schools play in promoting traditional ecological knowledge, stewardship, and land-based learning.
- **Goal 4 (Collaboration):** Elevate BIE to parity with other federal school systems by establishing accountability and performance measures unique to tribal schools.
  - Tribally Controlled Schools are locally controlled, and their accountability systems should be managed by local systems, rather than one-size-fits-all programs.

#### 4. Include a Dedicated Objective or Strategy to Fund School Resource Officers (SROs)

Tribal schools are experiencing an alarming increase in threats to student safety. Many tribal schools like us, as previously testified before Congress, are forced to divert educational instruction funding (Indian Student Equalization Program) to fund basic school security—a burden no public school system in the U.S. is expected to shoulder alone.

According to BIE’s own estimates shared during the March 2024 Tribal Interior Budget Council meeting, it would require approximately \$93 million annually to fully fund SROs across BIE-funded schools. This investment would provide every school with a dedicated officer to protect students from gun violence, trafficking, and threats that disproportionately impact Native youth.

However, BIE has no current appropriation to provide SROs. Tribal schools are instead forced to redirect already-underfunded Indian Student Equalization Program (ISEP) funds to fill this gap, at the expense of instructional services.

We urge the DOI to:

- Include SRO funding under Goal 2.1 (Interior resources protect people and property) as a specific measurable strategy.
- Track the percentage of BIE schools with an assigned, full-time School Resource Officer, and set targets for full staffing by FY 2030.
- Directly advocate in budget requests for a new mandatory appropriation for tribal school safety.

#### 5. Track Interior’s Performance in Delivering Safe, Adequate School Infrastructure

The Strategic Plan should not only measure how well tribes implement programs, but also how well the Department fulfills its trust obligations. As noted during consultation, BIE schools face a \$6.7 billion infrastructure backlog and are consistently underfunded compared to other federal school systems.<sup>4</sup> To advance equity and transparency, the final Strategic Plan must include performance indicators measuring how well the federal government meets its obligations to tribal schools. These should include:

- **Per-pupil federal funding parity** between BIE, DoDEA, and state public schools.
  - DoDEA students are funded at approximately \$25,000 per pupil;
  - State public schools average \$15,000 per pupil;
  - BIE students receive only \$6,800 per pupil.
- **Percentage of BIE schools in poor or unsatisfactory facility conditions**, with annual reduction goals.

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<sup>4</sup> See, February 12, 2025 - House Committee on Natural Resources, Subcommittee on Oversight and Investigations Oversight Hearing on “Leaving Indian Children Behind; Reviewing the State of BIE Schools.” <https://naturalresources.house.gov/calendar/eventsingle.aspx?EventID=416913>

- **Timeliness of school construction project approvals**, particularly for 297 and 638 locally controlled schools.
- **Implementation of tribal-preferred designs and co-management practices** in new construction.

## 6. Remove Barriers to Tribal Education Funding

The Strategic Plan repeatedly references “grant-based partnerships” under Objective 4.2 and throughout the goals. However, relying on competitive grants to fund school safety and education perpetuates systemic underfunding. Funding tribal schools through mandatory, direct appropriations is more consistent with the federal trust obligation.

We strongly urge the Department to:

- Collaborate with Congress and the BIE to transition toward mandatory funding models, similar to those of DoDEA.
- Leveraging the DOI’s secretarial waiver authority to adopt tribal procurement and construction policies, consistent with Executive Order 13175.
- Recognize the inherent inequity of forcing tribal schools to choose between basic safety and instructional programming due to limited funding.
- Reducing redundant federal reporting requirements by honoring tribal audits and accreditation

## Conclusion

We appreciate the opportunity to contribute to this strategic planning process. Our recommendations center on the federal obligation to tribal children—a duty that must be honored not just in words, but in funding, policy, and outcomes. BIE-funded schools are not simply another stakeholder group—they are an extension of federal trust responsibility and a critical instrument of tribal sovereignty.

We are grateful for the opportunity to provide input and stand ready to work with the Department to ensure these recommendations are reflected in the final FY 2026–2030 Strategic Plan.

Respectfully,



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Head of School

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