



NATIONAL INDIAN EDUCATION ASSOCIATION

January 13, 2019

Office of Indian Education  
Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

***Re: NIEA Comments on Proposed Changes to the STEP Grants Program***

To Whom It Concerns:

Thank you for the opportunity to submit written comments regarding the proposed changes to the State Tribal Education Partnership (STEP) Grants Program. The National Indian Education Association (NIEA) is the nation's most inclusive organization advocating for improved educational opportunities for American Indians, Alaska Natives, and Native Hawaiians. Our mission centers on ensuring that Native students have access to a high-quality academic and cultural education, a goal that is only possible if the Department of Education (Department) upholds the federal trust responsibility to tribes.

**The Federal Trust Relationship**

The Department of Education has a federal trust responsibility for the education of Native students. Established through treaties, federal law, and U.S. Supreme Court decisions, the federal government's trust responsibility to tribes includes the obligation to provide parity in access and equal resources to all American Indian and Alaska Native students, regardless of where they attend school. Programs that support and build capacity for tribal education agencies (TEA) are critical to fulfilling the federal trust relationship to Native students and communities.

**Sovereignty in Tribal Education Systems**

Tribes know best the unique cultural and academic needs of Native students in diverse school systems across the country. The STEP Grants Program provides a foundation to ensure that tribes, through TEAs, have access to critical resources and funding necessary to develop education programs tailored to the unique needs of their students. Through this program, TEAs have access to funds for building education capacity and developing partnerships with state and local educational agencies. Through funding that supports tribal sovereignty in Native education systems, the STEP Grants Program expands opportunities for Native student success via local determination over the academic and cultural needs of the whole child.

## **NIEA Recommendations**

Tribal self-determination over the education of Native students is essential to student success. NIEA submits the following recommendations to strengthen and expand federal resources and funding that support tribal self-determination over education.

### ***Fund New and Existing TEAs***

NIEA stands with tribes and tribal leaders, who have expressed overwhelming support for funds provided to both new and existing tribal education departments and agencies through the STEP Grants Program. As federal funding for the development of strong TEAs remains limited, it is critical that tribes have access to resources for establishing and building capacity for new tribal education departments. NIEA recommends awarding funds to new and existing tribes in the same competition year, streamlining the grant application process for tribes. The Department of Education should support additional opportunities for all tribes to exercise sovereignty over education systems, and this starts with increased investment in building capacity and developing partnerships for TEAs.

### ***Uphold Sovereignty in Native Education Systems***

Tribes must have access to resources necessary to support strong education systems for Native students, no matter where they attend school. Each tribe, community, and school has a unique set of cultural and academic needs that guide partnerships and services under the STEP grant program. From directly administering education programs, including the Title programs, to building capacity and providing critical resources for culturally relevant curriculum and pedagogy in the classroom, tribes must have access to a diverse set of resources and opportunities to support strong education systems in Native communities.

### ***Maintain Current Requirements for the Preliminary Agreement***

As set forth under the 2015 competition for the STEP Grant Program, the preliminary agreement provides an opportunity to ensure that all parties engaged in the STEP Grant are committed to the program's purpose as outlined by Congress. This provides a foundation upon which tribes can build critical capacity and ensures that local and state educational agencies are committed tribal partnerships and programs that address the specific needs of the communities that they serve. NIEA supports maintaining the current requirements of the STEP Grants Program's preliminary agreement in the name of tribal sovereignty.

### ***Expand Opportunities and Funding for Building Capacity and Partnerships***

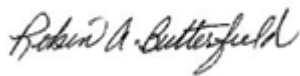
Tribal leaders and communities have called for expanding resources to support tribal education agencies and bolster partnerships with state and local educational agencies. Challenges with sharing agreements and inadequate funding continue to challenge TEAs as they provide opportunities for professional development, culturally relevant curriculum, and language programs. Additional funding, staff for grant writing, and technical assistance is critical to ensure the continued success of the STEP Grants Program.

Funding for new and existing TEAs depends on the number of students served, services provided, size of the TEA, and number of partnerships involved in the process. Given such factors, the Tribal Education Departments National Assembly estimates that the Department should allocate a minimum of \$500,000 for the creation of each new TEA under the STEP Grant Program. In addition, existing TEAs should receive a minimum of \$250,000 for the first year; 100,000-\$200,000 for the second year, and \$50,000-\$100,000 for the third year in order to ensure effective delivery of services to Native students and communities. Such funding is critical for tribes to build capacity and develop education programs through state and local partnerships that address the cultural and academic needs of Native students.

### **Conclusion**

With these recommendations, NIEA looks forward to working with you to ensure equity in education for the only students which the federal government has a direct responsibility to educate – Native students. Tribes, tribal organizations, and schools serving Native students must have access to the tools and resources to expand high-quality, culturally relevant curricula and programs in Native communities. Thank you for considering these comments for the record. If you have any questions, please contact Adrienne Elliott, NIEA Legislative Analyst, at [aelliott@niea.org](mailto:aelliott@niea.org).

Sincerely,



Robin Butterfield  
NIEA President