June 23, 2017

Tony Evers
State Superintendent
Wisconsin Department of Public Instruction
125 S. Webster Street
Madison, WI 53703

Re: Wisconsin Department of Public Instruction (WDPI) Consolidated State Plan

Dear Superintendent Evers,

Thank you for the opportunity to provide feedback on the Wisconsin Department of Public Instruction (WDPI) Consolidated State Plan under the Every Student Succeeds Act (ESSA). The National Indian Education Association (NIEA) works to ensure that all Native students receive a high-quality academic and cultural education. As NIEA expands to support states with high Native student populations, Wisconsin is among our priority states that we are working in. We look forward to continuing collaborating with WDPI as we work in partnership with the 11 federally recognized tribal nations in the state.

NIEA Supports Native Nations in Wisconsin
First and foremost, NIEA recommends that WDPI continue to work in close partnership with tribes and NIEA to understand tribal priorities as they relate to ESSA implementation. By law, part of that coordination must include tribal consultation at the state and district levels. In practice, ESSA provides an opportunity for stakeholders to collaborate and to better serve Native students. We ask that WDPI remember that Native students are best represented by tribal leaders, Native parents and educators, and tribal organizations.

NIEA’s Top Priority: Timely and Meaningful Consultation
NIEA strongly believes that Native students benefit from culturally relevant solutions, which is why NIEA’s first recommendation is to include a specific section on consultation in the body of the plan that addresses tribes and tribal organizations in the implementation of ESSA. NIEA wishes to highlight the following areas of the Wisconsin ESSA Plan which require meaningful consultation with tribal governments:

- Accountability
- School Improvement
- Educator Development
- Student Supports
When considering the above areas of Wisconsin’s ESSA Plan, we look forward to working with you, the tribes, and Native advocates to make sure true dialogue occurs in the above areas. NIEA also wishes to remind you of our definition of meaningful tribal consultation which: (1) occurs at earliest possible stage, (2) is a continuous process, (3) includes open communication & coordination, (4) works off the understanding that the process is equally important as the results, (5) outlines minimum guidelines, expectations, & outcomes necessary. As you finalize the plan, we respectfully recommend that you include the above elements in the process and in your final written document. We will be happy to work with you throughout and hope you will continue to engage with tribal leaders, Native advocates, and NIEA.

School Improvement through Culturally Relevant Approaches
NIEA appreciates that WDPI listed community engagement as a strategy to support schools that fail to exit comprehensive support and intervention status after six years (on page 39). NIEA would like to emphasize the importance for WDPI to ensure that struggling schools seek parent, family, and tribal input to ensure that culturally responsive modifications and adjustments are provided. This recommendation comes from the knowledge that Native parents and community members know their students’ culture best and, as a result, often know what interventions will work best for Native students.

NIEA applauds WDPI’s list of groups to engage in order to make locally informed decisions regarding rigorous interventions. WDPI specifically outlined Native American representatives which includes Tribal Chairs/Presidents (or their designees), tribal council representatives, and Tribal Education Directors and Staff (on page 40). Insight and recommendations from tribal communities are critical to ensuring that Native students throughout the state of Wisconsin are supported holistically. Building from WDPI’s acknowledgement of the importance in having tribal representation, NIEA recommends that WDPI add specific language on authentic engagement with Native parents and community members on page 41 when discussing the additional requirements and supports needed for improvement plans. Lastly, NIEA recommends that WDPI include Tribal Education Departments/Agencies as entities to receive capacity building support on page 41. In order for Native students to succeed and reach their fullest potential, the tribal agencies that serve them must have adequate support. This is why building capacity at the school and district level should be available at the tribal level as well.

Specific Activities for Resource Allocation Review
NIEA also recommends that WDPI add clarifying language to identify and address resource inequity under the development of the Resource Allocation Review (on page 42). Specifically, NIEA supports the suggestion to identify and address other resource inequities such as:

- Amount of federal funds available for school improvement;
- Number of schools and districts identified under the ESSA and the Individuals with Disabilities Education Act (IDEA);
- Evidence of effective implementation of district and school improvement efforts; and
- Feedback from schools and LEAs regarding improvement efforts and resources needed.

We suggest that WDPI add to this list of resource inequalities a healthy school climate, access to specialized instructional support personnel (including guidance counselors and social workers), and access to high-quality preschool programs and full-day, five-day-a-week kindergarten. It
may also be instructive for schools to show that they provide access to core academic subject courses that are prerequisites for a regular high school diploma.

**Technical Assistance for Tribal Education Departments and Agencies**
NIEA appreciates that WDPI will provide technical assistance and support for each LEA serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement (on page 43). Since this technical assistance is based on successful implementation of evidence-based practices and has a deep focus on equity, NIEA recommends that tribal educational agencies (TEAs) be eligible to receive this support as well. In order to best support Native students, we need to strengthen tribal capacity through TEAs and the tribes themselves. WDPI is taking critical steps to establish a solid foundation with relevant background knowledge and infrastructure at the state, regional, district, and school levels to ensure that effective technical assistance is provided to the schools and students who need it most. As such, NIEA recommends that WDPI expand its reach to include providing technical assistance at the tribal level.

**Conclusion**
Through the recommendations listed here and the implementation of the transition to ESSA, NIEA looks forward to continuing to work alongside tribes and Native education advocates. The guidance provided from tribal communities is invaluable and will best support Native students in Wisconsin. We look forward to continuing working with you and your team. If you have any questions, please contact Ahniwake Rose, NIEA Executive Director, at arose@niea.org.

Sincerely,

Yatibaey Evans
President