In November 2014, the United States Government Accounting Office (GAO) authored an analysis of school spending in the Bureau of Indian Education (BIE). The report states that BIE-operated day schools spent $15,400 per-student in 2009-2010, approximately $5,500 per-pupil more, on average, than public schools nationwide. Clear analysis shows that BIE schools spend approximately the same amount as public schools in rural areas with similar challenges in transportation and facilities that serve students from low-income households.

Analysis of the only other system for which the federal government has responsibility of, Department of Defense Education Agency (Department of Defense) schools, strengthens the case for funding for BIE schools. In 2016, Department of Defense Agency schools received $29,523 per-student, approximately double the funding appropriated to BIE schools. Additional funding is needed to fulfill the federal government’s fiduciary responsibility to Native students.

BIE Per-Student Spending Comparable to Public School Expenses in Rural Areas

The GAO Report analyzed spending through four primary categories to examine the differences in expenditures between BIE schools and public schools. The Report as a whole found that challenges faced by school administrators, educators, and students in the BIE system make such expenditures necessary for the schools to function.

### Instruction Costs

Most would agree that instruction is important: teachers in BIE schools in rural and reservation areas play a critical role in educating Native students. The Report identifies one cause of higher expenditures on instruction very clearly: federal law requires that teachers in BIE-operated schools be paid at rates comparable to personnel teaching in Defense Department schools overseas. This requirement increases the average salary of BIE teachers relative to those in public schools.

The per-pupil difference in instruction and teacher salary cost is further explained by low overall student populations and location of BIE schools.

- The average number of students in BIE schools is 262 students per facility, compared to the 474 students in public schools, which impacts public per-pupil expenditures.
- Teacher salary requirements and small rural schools in remote locations prevent economies of scale. These considerations explain the $4,100 difference in BIE Schools spending in instructional costs per student.

Additionally, all BIE schools serve student populations with more than 40% free and reduced lunch leads to minimal differences in overall spending: less than $200 in one case and $1500 in another.

In short, when comparing BIE schools to comparable public schools, the apples-to-apples comparison in the Report reveals minimal differences in per-pupil spending.
Transportation Costs

BIE schools are located in remote areas in rural communities with longer commutes than the majority of public schools in urban and suburban America—students often travel up to 100 miles one way. The Report points out that BIE’s school vehicles go through greater wear and tear, increasing maintenance costs. Long distances coupled with unsafe roads reduce student safety and lengthen the time that students travel to receive an education. The $530 difference in per-pupil transportation cost is a factor that most would agree is completely reasonable.

Maintenance and Operations

One-third of BIE schools are in poor condition, while three (3) percent of public schools nationwide reported that they were in poor condition. These conditions are unacceptable and even a brief review of the challenges shows that the difference in this area is not one where savings is appropriate:

- Broken HVAC systems force students to attend school in coats or in heat not conducive to learning;
- Severe cracks in academic buildings short-circuit the electrical system and cause fires;
- Exposed asbestos, lead paint, mold, water damage, and broken glass jeopardize students and staff in classrooms.

Based on these specific challenges, the analysis in the Report, and BIE’s analysis, it is clear that underfunding of maintenance rather than overfunding of it is an issue, causing poor conditions in school facilities and reducing the ability of BIE schools to provide safe and proper standards for Native students. The $700 in increased maintenance and operations costs that BIE schools incur is necessary.

Administration

The $630 difference in the Report between BIE and public school spending on administration—$1,502 per student versus $865 per-student—is explained partly by the fact that BIE schools are smaller and cannot take advantage of economies of scale. The Report goes on to state explicitly that administrative costs have been determined by GAO to not be able to be compared to public school administrative costs.

Recommendations for BIE School Funding

Schools in the BIE system face unique challenges that justify higher per-pupil expenses in comparison to the national average for public schools. In fact, the GAO’s Report itself makes it clear that additional staff to oversee school expenditures is necessary—a reform that NIEA strongly supports. NIEA recommends that:

- Native students receive funding for BIE schools with consideration of the federal trust responsibility for Native education.
- Tribes should be directly involved in the discussion of teacher pay for schools located on their lands.
- BIE schools should have administrators with the added, critical financial skills to effectively manage school budgets in rural locations. Such individuals and the training to help them do the job will cost more and not less.

Based on the above categories—and the clear and reasonable explanations in the GAO Report itself—per-pupil expenditures for BIE schools must be a continued funding priority. We simply will not be able to fix BIE schools by defunding them.

Endnotes

2 Id. at 13.
7 GAO Report, P. 19.
8 GAO Report, Summary, before P. i