



NNBEJE-1076-2025

**RESOLUTION OF THE
NAVAJO NATION BOARD OF EDUCATION**

Relating to Education; Approving the Reauthorization of the Lukachukai Community School, Inc. for the Operation of Education, Education-Related, and Residential Programs, Pursuant to Public Law 100-297, for the Period of One (1) Year, Beginning July 1, 2025 and Ending on June 30, 2026

WHEREAS:

1. The Department of Diné Education (hereinafter the “Department”) is the administrative agency within the Navajo Nation with responsibility and authority for implementing and enforcing the educational laws of the Navajo Nation. 2 N.N.C. § 1801 (B); 10 N.N.C. § 107 (A). The Department is under the immediate direction of the Board. 10 N.N.C. § 107 (B).
2. The Navajo Nation Board of Education (hereinafter the “Board”) is the education agent in the Executive Branch for the purposes of overseeing the operation of all schools serving the Navajo Nation. 10 N.N.C. § 106 (A). The Board carries out its duties and responsibilities through the Department of Diné Education. 10 N.N.C. §106 (G)(3). In addition, “the Board [has the] general power to monitor the activities of all Bureau of Indian Affairs funded schools and local community school boards serving the Navajo Nation...” 10 N.N.C. § 106 (G)(1).
3. On May 16, 2012, the Health, Education and Human Services Committee of the Navajo Nation Council enacted **HEHSCMY-012-12** and the “Administrative Rules and Regulations,” that delegated the Navajo Nation Board of Education with the authority to approve P.L. 100-297 and P.L. 93-638 contract reauthorizations. **HEHSCMY-012-12** sets forth the parameters and conditions for reauthorization of schools.
4. In accord with **HEHSCMY-012-12**, the Board reviews and recommends the reauthorization of Public Law 93-638 Indian Self-Determination and Education Assistance Act contract and Public Law 100-297 grant schools and residential programs under the Tribally Controlled Schools Act for the operation of education and education-related programs and/or residential programs in accord with the contract application for a certain number of years and bases and formulates its recommendations upon the testimony, reports, and supporting information provided by the **Lukachukai Community School, Inc.**, and the monitoring reports and recommendations provided by the Department of Diné Education. The Navajo Nation Board of Education also conditions its sanction, approval and

DEPARTMENT OF DINÉ EDUCATION

Post Office Box 670 · Window Rock, Arizona, 86515 · Phone (928)871-7475

NAVAJO NATION BOARD OF EDUCATION

Nadine M. Chatto, **President** · Freda Nellis, **Vice President** · Andrea K. Thomas, **Secretary**

Members: Dr. Henry Fowler · Joan A. Gray · Emerson John
Spencer W. Willie · Sharon A Toadecheenie · Dr. Pauletta White
Claudia Edgewater-Russell, **(A) Superintendent of Schools**

authorization upon the standard conditions (Attached hereto as “**EXHIBIT B**”) which the Navajo Nation places upon Navajo Nation tribal organizations which are authorized to operate BIE-funded education and education-related programs, and/or residential programs.

5. The Board finds that the **Lukachukai Community School, Inc.** has submitted a timely and complete reauthorization application that complies with the requirements of the requirements of the Grant/Contract Conversion/Maintenance Handbook (Resolution ECF-12-01), Clarifying Instructions to Grant Application Content Provisions of the Grant/Contract Conversion/Maintenance Handbook (Resolution HEHSCMA-02-21), and Delegation of Authority (Resolution HEHSCMY-012-12.) **Lukachukai Community School, Inc.’s** application is attached hereto as “**EXHIBIT A.**”
6. According to audit reports and testimony provided by the Office of Diné Accountability & Compliance (“ODAC”) attached hereto as “**EXHIBIT A-1,**” the Board finds that the **Lukachukai Community School, Inc.** meets the conditions of “one or less year(s) reauthorization”. HEHSCMY-012-12, Section II, (A)(1). In particular, the school’s 2024 audit was “Unmodified,” but contained material weaknesses in the financial statements and federal awards sections. The school’s 2023 audit was “Unmodified,” but contained material weaknesses in the financial statements section. The school’s 2022 audit was “Unmodified,” but contained material weaknesses in the financial statements section.
7. The **Lukachukai Community School, Inc.’s** academic progress report is attached hereto as “**EXHIBIT A-2,**” in addition to other documents provided by the Office of Education Research & Statistics (“OERS”) and Office of Diné School Improvement (“ODSI”).
8. The Board finds that the **Lukachukai Community School, Inc.** has complied with the Navajo language and culture instructional requirements, incorporation of the Diné Content Standards, and addressed other findings as reported by the Office of Standards, Curriculum, and Assessment Development (“OSCAD”), attached hereto as “**EXHIBIT A-3.**”
9. According to reports provided by COGNIA, the **Lukachukai Community School, Inc.’s** was rated as “Accredited Under Review,” (July 31, 2023) attached hereto as “**EXHIBIT A-4.**”

NOW THEREFORE BE IT RESOLVED THAT:

1. The Navajo Nation Board of Education approves the reauthorization of the grant of the **Lukachukai Community School, Inc.** to operate education, education-related, and residential programs, for the period of one (1) year, beginning July 1, 2025 and ending on June 30, 2026.
2. The **Lukachukai Community School, Inc.** and newly elected/appointed school board member(s) shall complete sections A, C, G, K, L, M, N, O, P, and Q within the application packet that applies to the school board member(s) and update the application packet when vacancies are filled.

3. The **Lukachukai Community School, Inc.** shall continue to enhance the learning of Diné Language and Culture, develop and implement a strong Diné Language/Culture program for the students, including updating the school's Diné language and culture curriculum and incorporation of the Navajo Nation's Five (5) Content Standards (Diné Language, Culture, Government, History, and Character), and provide Diné language assessment data to the Department.
4. The **Lukachukai Community School, Inc.** shall prepare for their upcoming accreditation review through coordination with the Department (COGNIA) including attendance and participation in upcoming meetings, trainings, and professional development. The school shall improve their "Accreditation Under Review" status.
5. The Navajo Nation Board of Education hereby conditions its sanctions, approval, and reauthorization upon the standard conditions, attached hereto as "**EXHIBIT B,**" which the Navajo Nation places upon Navajo Nation tribal organizations which are authorized to operate BIA-funded education and education-related programs.
6. To the extent permitted by Navajo Nation law, the Navajo Nation further conditions approval of this reauthorization application based on the school's compliance with addition conditions, attached hereto as **EXHIBIT C.**
7. The Navajo Nation Board of Education hereby recommends and empowers the Superintendent of Schools to take any actions deemed necessary and proper to carry out the purposes of this resolution and directive.

C E R T I F I C A T I O N

I hereby certify that the foregoing resolution was duly considered by the Board of Education of the Navajo Nation at a duly called meeting at Window Rock, Arizona (Navajo Nation) at which a quorum was present, motioned by Andrea Thomas and seconded by Sharon A. Toadecheenie and that the same was passed by a vote of 6 in favor; 0 opposed; 2 abstained, this 4th day of June 2025.



Nadine Chatto, President
Navajo Nation Board of Education



Grant Application Content

A. Name, address and phone number of the school board submitting the application.

Lukachukai Community School, Inc.
Navajo Route 12
P.O. Box 230
Lukachukai, Arizona 867507

Telephone Number: (928) 291-008 Fax: (928) 787-3191

Website: <https://www.lukaschool.org>

Contact persons: Stanley Kedelty, President
Jaye Tom, Vice President
Mary E. Begay, Member
Connette Blair, Member
VACANT, Member

The approved 2024 - 2028 Navajo Nation School Board Apportionment Plan (HEHSCMA-01-24) states the school consists of a five (5) Member Board as the Lukachukai Community School: 1 – Tsaille/Wheatfields Chapter; 3 – Lukachukai Chapter; and 1 – At-Large – Round Rock Chapter and Rock Point Chapter.

**Note: Currently the school has one (1) vacant school board position; therefore, the application contents will show only four (4) school board submitting the required documents throughout the application packet.*

B. Resolutions from the local school board and the chapter(s) within the schools’ authorized boundaries supporting the school board application.

The application package includes:

Resolution of the Lukachukai Community Board of Education, Inc.; passed at a duly called meeting on March 14, 2025, to continue to operate under the authority of Public Law 100-297 and Navajo Nation Law.

Supporting Resolutions are from:

- 1. Central Navajo Agency Council; passed on December 28, 2024

C. Narrative explanation of the school board’s prior experience and knowledge in operating the school.

The application includes the four (4) board members’ narratives outlining their experiences and educational backgrounds. On an ongoing basis, the board members attend conferences, workshops and training to remain abreast of current school operation and board knowledge to meet the needs of the school and personal interest.

D. Information on the geographic and demographic factors in the affected areas.

The application package includes the geographic and demographic factors, as they comply with Navajo Nation Policies and Procedures for Waiver of School Attendance Boundaries for Navajo Nation Bureau of Indian Affairs-Funded Schools Commencing in School Year 2000 (Resolution # ECN-112-00).

E. A narrative description identifying each of the programs to be offered by the school board and a description of an implementation plan for each program.

Included in the packet, Lukachukai Community Board of Education, Inc.'s Educational Program Summaries that include:

- Brief Background Overview/Mission/Vision
- Educational Philosophy
- Academic Program(s)
- Navajo Language and Culture Program
- Counseling Services
- Exceptional Student Services (ESS)
- Parent Involvement
- Residential Program
- Transportation Program
- Facility Department
- Food Service Department
- Informational Technology Department
- Administrative Staff
- Business Office
- Human Resources (HR) Department

F. If not adopted, an affirmative statement that the Navajo Nation North Central Association (NN/NCA) Academic Standards will be adopted and that NN/NCA Certification will be acquired within one year.

The application package includes a copy of their certificate, certifying that Lukachukai School (dba: Lukachukai Community Board of Education, Inc.) having met the requirements established by the AdvancED Accreditation Commission and Board of Trustees is hereby accredited by the North Central Association Commission on Accreditation and School improvement; valid through June 30, 2029.

Note: The Cognia Accreditation Offices has placed Lukachukai Community School on a status of ACCREDITED UNDER REVIEW. This action was ratified at the July 31, 2023, meeting with the Cognia Global Commission (letter is also included in the application packet).

The application package includes the geographic and demographic factors, as they comply with Navajo Nation Policies and Procedures for Waiver of School Attendance Boundaries for Navajo Nation Bureau of Indian Affairs-Funded Schools Commencing in School Year 2000 (Resolution # ECN-112-00).

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Note: The Cognia Accreditation Offices has placed Lukachukai Community School on a status of ACCREDITED UNDER REVIEW. This action was ratified at the July 31, 2023, meeting with the Cognia Global Commission (letter is also included in the application packet).

The application includes the Lukachukai Community Board of Education, Inc. contracts with The Mahoney Group – Mesa (Program Term: July 1, 2024 to July 1, 2025).

7) Consolidated school reform plans (1114).

In lieu of the Consolidated school reform plans the school's Plan4Learning which includes the Vision and Mission Statements, Comprehensive Needs Assessment, School Programs and Process, Opportunities for Growth Identifying School Programs & Process Needs, School Perception Comprehensive Needs Assessment, Areas of Growth Related to Smart Goals Comprehensive Needs Assessment, Smart Goals, Funding Summary, the Schoolwide Budget, and a Plan Review Checklist, are included in the application.

8) Reporting Requirements (Single Agency Audit Act of 1984 as amended).

The reporting requirements (Single Agency Audit Act of 1984 as amended) is addressed in the Lukachukai Community Board of Education, Inc. Financial Policy; approved on February 13, 2024.

9) Implementation and enforcement of the Navajo Nation Ethics in Government Law (2 N.N.C. §6).

The implementation and enforcement of the Navajo Nation Ethics in Government Law (2 N.N.C. 6) is addressed in the Lukachukai Community School Board By-Laws; approved on February 11, 2025.

I. Documentation of Incorporation with the Navajo Nation Corporation Commission.

The application package includes:

- Certificate of Good Standing dated February 26, 2025, for Annual Report Year Ending June 30, 2024.
- Certificate of Good Standing dated December 4, 2023, for Annual Report Fiscal Year Ending June 30, 2023.
- Certificate of Good Standing dated November 16, 2022, for Annual Report Fiscal Year Ending June 30, 2022.
- Lukachukai Community Board of Education, Inc. (File #: 100343) was issued a Certificate of Incorporation and authorized to transact business within the Navajo Nation on February 20, 1997.

J. A Scope of Work that addresses program implementation and compliance to be utilized as a foundation by an independent auditing firm that will be retained to conduct an annual audit which meets the requirements of the Single Agency Audit Act of 1984 as amended in 1996.

The application package includes a scope of work and Audited Financial Statements for the years ended:

- June 30, 2024 with Heinfeld, Meech & Co., P.C.
- June 30, 2023 with BDR Richards CPS'S, PLC
- June 30, 2022 with BDR Richards CPS'S, PLC

K. Assurances that all employees will receive a background investigation and that the employees will meet the minimum standards for character and suitability required in 25 CFR Part 63.11. School board members, in compliance with Navajo Law (including Navajo Election Law) and Federal laws, will also receive criminal background investigations. The criminal background check will include federal, state, and tribal convictions or *Nolo Contendere* pleas on child related convictions. No individuals convicted of any child related crimes may serve on the school board.

The application package includes required signed certification from the four (4) school board members, as they will be in compliance.

L. Certification from each school board member that they have read and understand 25 USC 450d-Criminal Activities Involving Grants, Contracts, etc.; Penalties.

The application package includes required signed certification from the four (4) school board members, as they will be in compliance

M. Certification from each school board member that they understand that all funds received must be deposited into accounts that are insured by an agency or instrumentality of the United States.

The application package includes required signed certification from the four (4) school board members, as they will be in compliance.

N. Certification from each school board member, the school chief administrative officer, and the fiscal & personnel manager that they have read and understand the Provisions of OMB Circular, A-87 particularly those sections that pertain to allowable and unallowable cost.

The application package includes required signed certification from the four (4) school board members; the Principal, the Business Manager, and the Human Resource Tech, as they will be in compliance.

O. Certification from each school board member that they have read and understand the “Indian Child Protection and Family Violence Prevention Act of 1990” requiring child abuse reporting procedures plan and background investigation requirement procedures.

The application package includes required signed certification from the four (4) school board members, as they will be in compliance

P. Signed copy of a School Board Code of Ethics from each school board member.

The application package includes required signed certification from the four (4) school board members, as they will be in compliance

Q. Certification from each school board member that they have received training in the contents of these requirements.

The application package includes required signed certification from the (4) school board members, as they will be in compliance

Reviewed by:



Lavidia B. Maestas, Sr. Education Specialist
Office of Diné Accountability and Compliance
Department of Diné Education

April 23, 2025
Date



MEMORANDUM

TO: Navajo Nation Board of Education
Department of Diné Education

FROM: Lavida B. Maestas
Lavida B. Maestas, Sr. Education Specialist
Office of Diné Accountability & Compliance

DATE: April 23, 2025

SUBJECT: **REAUTHORIZATION REPORT AND RECOMMENDATION – LUKACHUKAI COMMUNITY SCHOOL, INC.**

The Lukachukai Community School, Inc.’s application is complete and meets the requirements of the Grant/Contract Conversion/Maintenance Handbook (Resolution ECF-12-01) and the Clarification Instructions for Grant Applications Provisions of the Grant/Contract Conversion/Maintenance Handbook (HEHSCMA-02-21).

The Luachukai Community School has one (1) vacant school board position; once the position has been filled, the newly elected school board member and school should complete sections A, C, G, K, L, M, N, O, P, and Q within the application packet that personally applies to the school board – update the application packet.

The Lukachukai Community School, Inc. submitted its annual audit report prior to the deadline of March 30th and is compliant with the financial and audit requirements contained in HEHSCMY-012-12, warranting “one (1) year reauthorization”. The annual audit is reported as:

- HeinfeldMeech & Co., P.C. reported the Annual Financial Statements for year ending June 30, 2024, as Unmodified with material and significant deficiency(ies); and the Federal Awards issued as Unmodified with material and significant deficiency(ies) identified. Audit findings disclosed include two (2) Financial Statement and three (3) Federal Award Findings and Questioned Costs which are:
 1. FS-2024-001 – Internal Controls Over Disbursements – (Material Weakness) – (...discussed in detail in Findings and Questioned Costs Related to Federal Awards were considered to be applicable to Findings Related to Financial Statements Reported in Accordance with *Government Auditing Standards.*) - (Repeat Finding: 2023-001)
 2. FS-2024-002 – Internal Controls over Financial Reporting – (Adequate internal controls were not in place to ensure financial activity was properly reported in the school’s accounting records) – (Significant Deficiency) – (Repeat Finding: 2003-001, 2022-001)
 3. 2024-001 – Federal Awards – (The School did not follow its Board adopted policies regarding disbursements to ensure all financial activities were properly processed.) – (Repeated Finding: 2023-001)

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Claudia Edgewater-Russell, **(A) Superintendent of Schools**

4. 2024-002 – Federal Awards – (Noncompliance, Significant Deficiency) - (The school did not follow federal guidelines for purchases exceeding the small purchases threshold.)
 5. 2024-003 – Federal Awards – (Noncompliance, Significant Deficiency) – (Timely background investigations were not retained for all employees) – (Repeat Finding: 2023-002, 2022-003)
- BDR Richards CPA’S, PLC reported the Annual Financial Statements for year ending June 30, 2023, as Unmodified with material weakness(es) and no reported significant deficiency(ies); and the Federal Awards issued as Unmodified with no material weakness(es) and with significant deficiencies identified. Audit findings disclosed include one (1) Financial Statement and one (1) Federal Award Findings and Questioned Costs which are:
 1. 2023-001 – Account Reconciliations – (Noncompliance, Account reconciliations were not performed timely and/or not agree to the general ledger when performed and the current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process.) (Repeat Finding: 2022-001, 2021-001 and 2020-001)
 2. 2023-002 – Federal Awards - Special Tests and Provisions Test Work – (Noncompliance, the auditor noted (Bureau of Indian Education) investigated and found the background checks were not performed properly) (Repeat Finding: Yes, 2022-003 and 2021-003)
 - BDR Richards CPA’S, PLC reported the Annual Financial Statements for year ending June 30, 2022, as Unmodified with material weakness(es) and no significant deficiency(ies); and the Federal Awards issued as Unmodified with no material weakness(es) and with significant deficiencies identified. Audit findings disclosed include two (2) Financial Statement and five (5) Federal Award Findings and Questioned Costs which are:
 1. 2022-001 – Account Reconciliations – (Noncompliance, Account reconciliation were not performed timely and/or did not agree to the general ledger when performed an current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process) (Repeat Finding: Yes, 2021-01 and 2020-01)
 2. 2022-002 – Federal Awards – Special Tests and Provisions Test Work (Noncompliance, the auditor noted the oversight agency (Bureau of Indian Education) conducted an investigation and found the background checks were not performed properly) (Repeat Findings: 2021-003)

Additionally, Cognia Accreditation Offices has placed Lukachukai Community School on a status of ACCREDITED UNDER REVIEW. This action was ratified at the July 31, 2023, meeting with the Cognia Global Commission (letter is also included in the application packet).

If you have any questions or concerns, please do not hesitate to contact me at (928) 871-7466 or lavidamaestas@nndode.org. Thank you.

2024 AUDIT



Lukachukai Community School, Inc.
Single Audit Reporting Package
Year Ended June 30, 2024

**Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024**

Summary of Auditor's Results:

Financial Statements

Type of auditor's report issued: Unmodified

Internal control over financial reporting:

- Significant deficiency(ies) identified: Yes
- Material weakness(es) identified: Yes

Noncompliance material to financial statements noted: No

Federal Awards

Internal control over major programs:

- Significant deficiency(ies) identified: Yes
- Material weakness(es) identified: Yes

Type of auditor's report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with §200.516 of Uniform Guidance: Yes

Identification of major programs:

<u>Assistance Listing Number</u>	<u>Name of Federal Program or Cluster</u>
15.042	Indian School Equalization
84.010	Title I Grants to Local Educational Agencies

Dollar threshold used to distinguish between Type A and Type B programs: \$750,000

Auditee qualified as low-risk auditee: No

Findings Related to Financial Statements Reported in Accordance with *Government Auditing Standards*: Yes

Findings and Questioned Costs Related to Federal Awards: Yes

Summary Schedule of Prior Audit Findings required to be reported: Yes

**Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024**

**Findings Related to Financial Statements Reported in Accordance with
*Government Auditing Standards***

Finding Number: FS-2024-001

Repeat Finding: Yes, 2023-001

Type of Finding: Material Weakness

Description: Internal Controls Over Disbursements

Finding 2024-001 which is discussed in detail in Findings and Questioned Costs Related to Federal Awards were considered to be applicable to Findings Related to Financial Statements Reported in Accordance with *Government Auditing Standards*.

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

**Findings Related to Financial Statements Reported in Accordance with
*Government Auditing Standards***

Finding Number: FS-2024-002

Repeat Finding: Yes, 2023-001, 2022-001

Type of Finding: Significant Deficiency

Description: Internal Controls over Financial Reporting

Criteria

According to generally accepted accounting principles (GAAP), School management is responsible for establishing and maintaining internal controls over financial reporting to include controls over the School's accounting records and general ledger transactions.

Condition

Adequate internal controls were not in place to ensure financial activity was properly reported in the School's accounting records.

Cause

The School's internal controls were not adequately established and implemented. There has been turnover in various key positions.

Effect

Errors have and/or may have occurred without proper review and approval. Audit adjustments were required to properly state the financial statements.

Context

Samples were not intended to be, and were not, statistically valid samples. We noted the following during our review:

- The School recorded July 2024 interest revenue for investments in FY24 that should have been recorded in fiscal year 2025.
- The School did not always record grant revenue timely, resulting in \$535,404 of revenues being recorded in the incorrect fiscal year.

Recommendation

The School should allocate the necessary resources to implement controls and procedures to ensure accounting records are being appropriately reviewed and approved.

Views of Responsible Officials

See Corrective Action Plan

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-001

Repeat Finding: Yes, 2023-001

<u>Program Names/Assistance Listing Titles:</u>	<u>Assistance Listing Numbers:</u>	<u>Federal Award Numbers:</u>	<u>Questioned Costs:</u>
Indian School Equalization	15.042	A23AV00864	N/A
Title I Grants to Local Educational Agencies	84.010	A23AV00864	N/A

Federal Agency(ies): U.S. Department of the Interior; U.S. Department of Education

Pass-Through Agency: Bureau of Indian Education

Type of Finding: Noncompliance, Material Weakness

Compliance Requirement: Activities Allowed or Unallowed, Allowable Costs/Cost Principles

Criteria

School management is responsible for establishing and maintaining internal controls over travel reimbursements, credit card transactions, journal entries, and disbursements that are adequate to ensure that all financial activities are properly processed and recorded. Further, Indian tribes and tribal organizations, may without the approval of the BIA, expend funds provided under a self-determination contract for purposes identified in 25 USC 5325, to the extent that the expenditure of the funds is supportive of a contracted program (25 USC 5325). These guidelines require internal controls over expenditures of federal monies to ensure expenditures comply with federal regulations and guidelines. (25 CFR 39; 25 CFR 900).

Condition

The School did not follow its Board adopted policies regarding disbursements to ensure all financial activities were properly processed.

Cause

The School has not implemented sufficient controls over disbursement transactions. There has been turnover in various key positions.

Effect

The School was not in compliance with Board adopted policies for federal regulations and guidelines.

Context

The sample was not intended to be, and was not, a statistically valid sample. During our review of disbursement transactions, we noted the following:

- For one of 10 travel reimbursements reviewed, the School did not maintain supporting documents.
- For four of 10 travel reimbursements reviewed, the School did not reimburse the expense using the correct rates established by GSA, resulting in a net overpayment of \$152.

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-001

Context

- For one of 10 travel reimbursements reviewed, meals were reimbursed with no overnight stay or substantial sleep/rest, and the reimbursement was not reported as a taxable employee benefit.
- For seven of 40 disbursements reviewed, no dated receiving report was retained; therefore, we were unable to determine if the School paid goods before they were received. Additionally, we were unable to agree the description and quantity to the purchase order.
- For 12 of 40 disbursements reviewed, the School ordered and received goods/services before a purchase order was in place.
- For two of 40 disbursements reviewed, the expenditures exceed the authorized purchase order amounts, resulting in total exceeded costs of \$151.
- For one of 40 disbursements reviewed, the goods were received after the payment was made to vendor.
- The School does not have a signed credit card user agreements that acknowledges the receipt of the School credit card use policies and procedures.
- For one of 15 credit card transactions reviewed, documentation to verify the receipt of the prepaid item was not maintained.
- Credit card statements were not always paid timely, resulting in late fees of \$2,086 and finance charges of \$2,317.
- For one cutoff transaction tested, it was determined that the expenditure should have been assessed as Construction-in-Process and tracked with the capital asset listing. The School did not track how much of the project had been completed at year-end.
- For one of 25 journal entries reviewed, the School did not maintain sufficient supporting documentation.
- For one of five cutoff transactions reviewed, it was determined that the expenditure should have been paid in the current fiscal year instead of the subsequent fiscal year.
- For one of five credit card purchases reviewed, there was no receipt retained.
- For 15 of 25 journal entries reviewed, the journal entry was not approved by someone other than the preparer.
- For one of 40 disbursements reviewed, the purchase requisition was dated after the purchase and no purchase order was provided.
- The School did not properly close out 13 open purchase orders.

Recommendation

The School should improve and adhere to its Board adopted policies and federal regulations. The School should ensure multiple employees understand the policies and procedures, so they can continue if there is turnover.

Views of Responsible Officials

See Corrective Action Plan.

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-002

Repeat Finding: No

<u>Program Names/Assistance Listing Titles:</u>	<u>Assistance Listing Numbers:</u>	<u>Federal Award Numbers:</u>	<u>Questioned Costs:</u>
Indian School Equalization	15.042	A23AV00864	N/A
Title I Grants to Local Educational Agencies	84.010	A23AV00864	N/A

Federal Agency(ies): U.S. Department of the Interior; U.S. Department of Education

Pass-Through Agency: Bureau of Indian Education

Type of Finding: Noncompliance, Significant Deficiency

Compliance Requirement: Procurement

Criteria

The Board should have adopted policies in accordance with 2 CFR §200.320 that requires the collection of quotes for purchases of at least \$10,000 but no more than \$250,000, and formal bid procedures for purchases over \$250,000.

Condition

The School did not follow federal guidelines for purchases exceeding the small purchases threshold.

Cause

The School has not implemented controls to perform the collection of quotes. There has been turnover in various key positions.

Effect

The School was not in compliance with the Board adopted policies and federal guidelines.

Context

The sample was not intended to be, and was not, a statistically valid sample. During our review of procurement requirements, we noted that the School did not prepare and maintain documentation for at least three written quotes from qualified sources, two instances from the Indian School Equalization Program, and three instances from the Title I Grants to Local Educational Agencies program.

Recommendation

The School should adopt and adhere to federal regulations and implement procedures for performing procurement, and should train multiple employees on the procurement process.

Views of Responsible Officials

See Corrective Action Plan.

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-003

Repeat Finding: Yes, 2023-002, 2022-003

Program Name/Assistance Listing Title: Indian School Equalization

Assistance Listing Number: 15.042

Federal Agency: U.S. Department of the Interior

Federal Award Number: A23AV00864

Pass-Through Agency: Bureau of Indian Education

Questioned Costs: N/A

Type of Finding: Noncompliance, Significant Deficiency

Compliance Requirement: Special Tests and Provisions

Criteria

According to the Indian Child Protection and Family Violence Protection Act (25 USC §3201 et. Sec.), the School must conduct a character investigation of each individual who is employed or is being considered for employment in a position that involves regular contact with, or control over, Indian children. The investigation should be reinvestigated every five years. The Act further states that the School may employ individuals in those positions only if the individuals meet standards of character, no less stringent than those prescribed under subpart B – Minimum Standards of Character and Suitability for Employment (25 CFR part 63).

Condition

Timely background investigations were not retained for all employees.

Cause

School and federal policies were not always followed or controls were not in place to ensure timely character investigations are performed and all adequate documentation is maintained. There has been turnover in various key positions.

Effect

The School was not in compliance with the Indian Child Protection and Family Violence Prevention Act.

Context

The sample was not intended to be, and was not, a statistically valid sample. During our review of the School's character investigations, we noted the following:

- For 14 of 40 background investigations reviewed, the reinvestigation was not conducted prior to the expiration of the preceding investigation.
- For four of 40 background investigations reviewed, the investigation did not contain all supporting documentation.

Lukachukai Community School, Inc.
Schedule of Findings and Questioned Costs
Year Ended June 30, 2024

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-003

Recommendation

The School should ensure adequate character investigations are performed in a timely manner and documentation is maintained to achieve full compliance with the School's policies and the Indian Child Protection and Family Violence Prevention Act.

Views of Responsible Officials

See Corrective Action Plan.



Lukachukai Community Board of Education, Inc.
"Commitment to Children, Commitment to Progress"

Navajo Route 12

P. O. Box 230

Lukachukai, Arizona 86507

Phone: (928) 291-0008 Fax: (928) 787-3191



March 18, 2025

To Whom It May Concern:

The accompanying Corrective Action Plan has been prepared as required by U.S. Office of Management and Budget Uniform Guidance. The name of the contact person responsible for corrective action, the planned corrective action, and the anticipated completion date for each finding included in the current year's Schedule of Findings and Questioned Costs have been provided.

In addition, we have also prepared the accompanying Summary Schedule of Prior Audit Findings which includes the status of audit findings reported in the prior year's audit.

Sincerely,

Patrice Henderson
Business Manager

Lukachukai Community School, Inc.
Corrective Action Plan
Year Ended June 30, 2024

**Findings Related to Financial Statements Reported in Accordance with
*Government Auditing Standards***

Finding Number: FS-2024-001

Contact Persons: Carmen Jodie, Principal; Patrice Henderson, Business Manager

Anticipated Completion Date: June 30, 2025

Planned Corrective Action: The School previously experienced a high turnover rate in the Business Office and Administration. The School had a Principal and Acting Principals throughout School Year 2023-24. The business office has obtained outside consulting services to assist in reconciliation and financial processes. The business office will continue to work with other departments in making sure they submit documentation accurately and timely.

Finding Number: FS-2024-002

Contact Persons: Carmen Jodie, Principal; Patrice Henderson, Business Manager

Anticipated Completion Date: June 30, 2025

Planned Corrective Action: The School had a Principal and Acting Principals throughout School Year 2023-24. The business office has obtained outside consulting services to assist in reconciliation and financial processes. The business office will work on recording revenue in the correct fiscal year.

Findings and Questioned Costs Related to Federal Awards

Finding Number: 2024-001

Program Name/Assistance Listing Title: Indian School Equalization

Assistance Listing Number: 15.042

Contact Persons: Carmen Jodie, Principal; Patrice Henderson, Business Manager

Anticipated Completion Date: June 30, 2025

Planned Corrective Action: The School previously experienced a high turnover rate in the Business Office and Administration. The School had a Principal and Acting Principals throughout School Year 2023- 24. The business office has obtained outside consulting services to assist in reconciliation and financial processes. The business office will continue to work with other departments in making sure they submit documentation accurately and timely. The business office will continue to work on improving the following areas: travel reimbursement, receiving reports, timely payment of bills, payment of goods, journal entries, purchase orders; per the findings listed. A Credit Card User Agreement form will be developed to support the school's Credit Card Policies and Procedures.

**Lukachukai Community School, Inc.
Corrective Action Plan
Year Ended June 30, 2024**

Finding Number: 2024-002

Program Name/Assistance Listing Title: Indian School Equalization; Title I Grants to Local Educational Agencies

Assistance Listing Number: 15.042; 84.010

Contact Persons: Carmen Jodie, Principal; Patrice Henderson, Business Manager

Anticipated Completion Date: June 30, 2025

Planned Corrective Action: The School previously experienced a high turnover rate in the Business Office and Administration. The School had a Principal and Acting Principals throughout School Year 2023-24. The business office has obtained outside consulting services to assist in reconciliation and financial processes. The business office will continue to work with other departments in making sure they submit three written quotes for purchases above \$10,000. All Department Supervisors/Administrators will be trained on the procurement process. The school's policies will be updated to comply with 2 CFR §200.320, along with supporting forms.

Finding Number: 2024-003

Program Name/Assistance Listing Title: Indian School equalization; Title I Grants to Local Educational Agencies

Assistance Listing Number: 15.042; 84.010

Contact Persons: Carmen Jodie, Principal; Renee Begay, Human Resource Technician

Anticipated Completion Date: June 30, 2025

Planned Corrective Action: It is recommended that the School completes all the outstanding background checks. Secondly, the School will ensure that all background checks are fully completed with the appropriate documents for all newly hired and current employees. It is understood that all current and new employees must be reinvestigated every five years and performed in a timely manner (before "the expiration of the preceding investigation"). This is how the school will attempt to attain compliance.

Lukachukai Community School, Inc.
Summary Schedule of Prior Audit Findings
Year Ended June 30, 2024

Status of Findings and Questioned Costs Related to Federal Awards

Finding Number: 2023-001

Program Name/Assistance Listing Title: Indian School Equalization

Assistance Listing Number: 15.042

Status: Partially corrected. See current year findings FS-2024-001 and 2024-001.

Planned Corrective Action: The School previously experienced a high turnover rate in the Business Office and Administration. The School had a Principal and Acting Principals throughout School Year 2023-24. The business office has obtained outside consulting services to assist in reconciliation and financial processes. The business office will continue to work with other departments in making sure they submit documentation accurately and timely.

Finding Number: 2023-002

Program Name/Assistance Listing Title: Indian School Equalization

Assistance Listing Number: 15.042

Status: Not corrected. See current year finding 2024-003.

Planned Corrective Action: It is recommended that the School completes all the outstanding background checks. Secondly, the School will ensure that all background checks are fully completed with the appropriate documents for all newly hired and current employees. It is understood that all current and new employees must be reinvestigated every five years and performed in a timely manner (before "the expiration of the preceding investigation"). This is how the School will attempt to attain compliance.



**DEPARTMENT OF DINÉ EDUCATION
THE NAVAJO NATION**

P.O. Box 670 · Window Rock, Arizona 86515
PHONE (928) 871 – 7475 · FAX (928) 871 – 7474

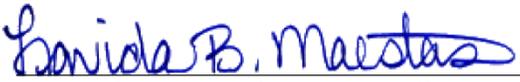


Dr. Buu Nygren
President

Richelle Montoya
Vice-President

MEMORANDUM

TO: Navajo Nation Board of Education
Department of Diné Education

FROM: 
Lavidia B. Maestas, Sr. Education Specialist
Office of Diné Accountability & Compliance

DATE: April 29, 2024

**SUBJECT: REAUTHORIZATION REPORT AND RECOMMENDATION – LUKACHUKAI
COMMUNITY SCHOOL, INC.**

The Lukachukai Community School, Inc.'s application is complete and meets the requirements of the *Grant/Contract Conversion/Maintenance Handbook (Resolution ECF-12-01)* and the *Clarification Instructions for Grant Applications Provisions of the Grant/Contract Conversion/Maintenance Handbook (HEHSCMA-02-21)*.

The Lukachukai Community School, Inc. submitted its annual audit report prior to the deadline of March 30th and is compliant with the financial and audit requirements contained in HEHSCMY-012-12, warranting “one (1) year reauthorization”. The annual audit is reported as:

- BDR Richards CPA’S, PLC reported the Annual Financial Statements for year ending June 30, 2023 as Unmodified with material weakness(es) and no reported significant deficiency(ies); and the Federal Awards issued as Unmodified with no material weakness(es) and with significant deficiencies identified. Audit findings disclosed includes one (1) Financial Statement and one (1) Federal Award Findings and Questioned Costs which are:
 1. 2023-001 – Account Reconciliations – (Noncompliance, Account reconciliations were not performed timely and/or not agree to the general ledger when performed and the current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process.) (Repeat Finding: 2022-001, 2021-001 and 2020-001)
 2. 2023-002 – Federal Awards - Special Tests and Provisions Test Work – (Noncompliance, the auditor noted (Bureau of Indian Education) investigated and found the background checks were not performed properly) (Repeat Finding: Yes, 2022-003 and 2021-003)
- BDR Richards CPA’S, PLC reported the Annual Financial Statements for year ending June 30, 2022 as Unmodified with material weakness(es) and no significant deficiency(ies); and the Federal Awards issued as Unmodified with no material weakness(es) and with significant deficiencies identified. Audit findings disclosed includes two (2) Financial Statement and five (5) Federal Award Findings and Questioned Costs which are:

NAVAJO NATION BOARD OF EDUCATION

Dr. Pauletta White, **President** · Andrea K. Thomas, **Vice President** · Nadine Chatto, **Secretary**
Members: Sharon A. Toadecheenie · Dr. Henry Fowler · Joan A. Gray
Emerson John · Spencer W. Willie · Freda Nells · Mary E. Begay
Roy Tracy, *Acting Superintendent of Schools*

1. 2022-001 – Account Reconciliations – (Noncompliance, Account reconciliation were not performed timely and/or did not agree to the general ledger when performed an current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process) (Repeat Finding: Yes, 2021-01 and 2020-01)
 2. 2022-002 – Federal Awards – Special Tests and Provisions Test Work (Noncompliance, the auditor noted the oversight agency (Bureau of Indian Education) conducted an investigation and found the background checks were not performed properly) (Repeat Findings: 2021-003)
- BDR Richards CPA’S, PLC reported the Annual Financial Statements for year ending June 30, 2021 as Unmodified with material weakness(es) and no significant deficiency(ies); and the Federal Awards issued as Unmodified with no material weakness(es) and with significant deficiencies identified. Audit findings disclosed includes two (2) Financial Statement and two (2) Federal Award Findings and Questioned Costs which are:
 1. 2021-001 – Account Reconciliations (Noncompliance, improperly designed internal controls resulted in School management not recording any fixed assets into the accounting system. In addition, reconciliations were not performed timely and/or did not agree to the general ledger when performed. Current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process) (Repeat Finding: Yes, 2020-001)
 2. 2021-002 – Controls over Allowable Cost/Allowable Activities (Noncompliance, the School has not required Board approval for employee stipend payments. This created a weak control environment surrounding the authorization and issuance of stipend payments. Additionally, the School’s administration violated governing stipends. The auditor received an independent report from the Principal that detailed the excessive stipends that were paid out during the fiscal year and in the previous fiscal years.) (Repeat Finding: Yes, 2020-002)
 3. 2021-003 – Federal Awards – Special Tests and Provisions Test Work (Noncompliance, during the test work over special tests and provisions, the auditor noted that for one employee the background check and character investigation could not be produced.) (Repeat Finding: No)
 4. 2021-004 – Federal Awards – Reporting (Noncompliance, the School did not submit their required Federal Financial Reports (SF-425) for two quarters December 31, 2020 and June 30, 2021 of the program year within the required 30 days after the end of each reporting period. The reports were submitted on April 15, 2021 and August 11, 2021 respectively.) (Repeat Finding: No)

BDR Richards CPA’S, PLC provided auditing services for the three (3) years identified. Since the school has retained their services for three (3) consecutive years, the school is to solicit for another auditor for year ending June 30, 2024 per Clarification Instructions for Grant Applications Provisions of the Grant/Contract Conversion/Maintenance Handbook (HEHSCMA-02-21 the Grant/Contract Conversion/Maintenance Handbook (Feb. 2000).

If you have any questions or concerns, please do not hesitate to contact me at (928) 871-7466 or lavidamaestas@nndode.org. Thank you.

2023 AUDIT



LUKACHUKAI COMMUNITY BOARD OF EDUCATION, INC.

"Commitment to Children, Commitment to Progress"

FINANCIAL STATEMENTS AND SINGLE AUDIT REPORTING PACKAGE

JUNE 30, 2023

**LUKACHUKAI COMMUNITY SCHOOL, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2023**

SECTION I – SUMMARY OF AUDITOR’S RESULTS

Financial Statements

Type of auditor’s report issued:	Unmodified
• Material weakness (es) identified?	Yes
• Significant deficiency (ies) identified that are not considered to be material weaknesses?	None reported
Noncompliance material to financial statements noted?	No

Federal Awards

Internal Control of major programs:	
• Material weakness (es) identified?	None reported
• Significant deficiency (ies) identified that are not Considered to be material weaknesses?	Yes
Type of auditor’s report issued on compliance for major programs:	Unmodified
Any audit findings disclosed that are required to be reported In accordance with 2 CFR 200.516(a)?	Yes

Identification of major programs:

Assistance Listing Number	Name of Federal Program or Cluster
15.042	Indian School Equalization Program
15.046	Administrative Cost Grants for Indian Schools
15.047	Indian Education, Facilities, Operations and Maintenance
15.062	Replacement and Repair of Indian Schools
84.425	Coronavirus Response and Relief Supplemental Act

Dollar Threshold used to distinguish between Type A and Type B programs: \$750,000

Auditee qualified as a low-risk auditee? No

LUKACHUKAI COMMUNITY SCHOOL, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2023

SECTION II – FINANCIAL STATEMENT FINDINGS

2023-001 Account Reconciliations - Repeated (Prior Year Finding 2022-001 2021-001 and 2020-001)

Condition:

Account reconciliations were not performed timely and/or did not agree to the general ledger when performed. Current policies and procedures do not provide for segregation of duties as the Business Manager is to post and reconcile transactions without any review process.

Cash

Cash accounts were reconciled but with large unknown variances. Amounts did not agree to the general ledger and adjustments were required. A review of the completed reconciliations is not being performed.

Accounts Payable and Accrued Liabilities

There were unsupported accounts payable and accrued liability balances for the School at yearend. The School lacks controls to ensure that accounts payable and accrued liabilities are reconciled during the year or at yearend. During our review and search for unrecorded liabilities and general disbursements, we noted cut-off exceptions for several disbursements.

Fund Balance

The School has recorded adjustments to correct ending balances for these accounts.

Capital Assets

The School has not reconciled or recorded capital outlay expenditures for capital additions. As a result, adjustments had to be recorded for both current year capital additions, construction costs and depreciation.

Criteria:

The School is responsible for maintaining adequate internal controls over its accounting records, account balances, and financial statement disclosures. Accounting records should include a complete, balanced general ledger that records all transactions that is supported by appropriate subsidiary records so that accurate financial statements can be prepared. Procedures should be in place to ensure that balance sheet accounts are independently reviewed and reconciled to the subsidiary records in a timely and effective manner.

Cause:

There was a lack of established internal controls and processes over the financial reporting and reconciliation process to ensure timely and accurate financial reporting. Also, the school has experienced turnover in several administrative positions.

Effect:

Without established and adequate internal controls and reconciliation procedures, the School's balances lack certainty about the accuracy of the balances. Also, the probability that fraud or material errors will occur and go undetected generally increases.

Repeat: Yes – Years as Repeat Finding: Three

**LUKACHUKAI COMMUNITY SCHOOL, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2023**

SECTION II – FINANCIAL STATEMENT FINDINGS - continued

Auditor's Recommendation:

We recommend management evaluate all aspects of the financial close and reporting process as well as the account reconciliation process and establish adequate internal controls and procedures to ensure timely and accurate financial statements and supporting schedules and to ensure timely compliance requirements are met.

View Of Responsible Officials:

The School agrees with this finding and has a plan in place to correct this.

LUKACHUKAI COMMUNITY SCHOOL, INC.
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2023

SECTION III – AUDIT FINDINGS IN RELATION TO FEDERAL AWARDS

2023-002 Special Tests and Provisions Test Work – Repeated (Prior Year Finding 2022-003 and 2021-003)

Federal Program information:

Funding agency:	U.S. Department of the Interior
Titles:	Indian School Equalization program (ISEP)
Assistance Listing Number:	15.042
Award Year:	07/01/2022 – 06/30/2023
Award number:	A22AV00862

Condition:

During our test work over special tests and provisions, we noted the oversight agency (Bureau of Indian Education) conducted an investigation and found the background checks were not performed properly.

Criteria:

The Indian Child Protection and Family Violence Prevention Act (25 USC 3201 et seq.) requires Indian tribes and tribal organizations that receive funds under the ISDEAA or the Tribally Controlled Schools Act to conduct an investigation of the character of each individual who is employed or is being considered for employment by such Indian tribe or tribal organization in a position that involves regular contact with, or control over, Indian children. The Act further states that the Indian tribe or tribal organization may employ individuals in those positions only if the individual meet standards of character, no less stringent than those prescribed under subpart B – Minimum Standards of Character and Suitability for Employment (25 CFR part 63), as the Indian tribe or tribal organization establishes.

Questioned Costs:

Unknown

Cause:

The School policies were not followed or were not in place. The school has experienced turnover in the Human Resource Manager position.

Effect:

The School is not in compliance with the special tests and provisions requirement.

Repeat:

Yes – Years as Repeat Finding: Two

Auditor's Recommendation:

We recommend that the School ensure that employees follow the policies and procedures that are in place along with the compliance requirements for the Indian School Equalization Program and ensure that that the compliance requirement is being followed.

Views of Responsible Officials:

The School agrees with this finding and has a plan in place to correct this.

LUKACHUKAI COMMUNITY SCHOOL, INC.
CORRECTIVE ACTION PLAN
FOR THE YEAR ENDED JUNE 30, 2023

Findings Related to the Financial Statements Reported in Accordance with *Government Auditing Standards*

Finding Number: 2023-001 -Account Reconciliations

Responsible Persons: Business Manager, Patrice Henderson

Anticipated Completion Date: June 2024

Planned Corrective Action: The school has experienced high turnover in the business office and Administration. The school was without a Principal for some time and the Business Manager was placed on Administrative leave. The school currently has an acting Principal and the Business Manager is back in the office full-time with an accounts payable clerk and new Human Resource Manager. The Business Manager will seek outside consulting and services to assist in reconciliations and financial processes. The Business Manager will continue to work on creating a more detailed coding system to allow for better tracking and to ensure this information is accurate and reconciled timely.

Findings Related to Federal Awards

Finding Number: 2023-002

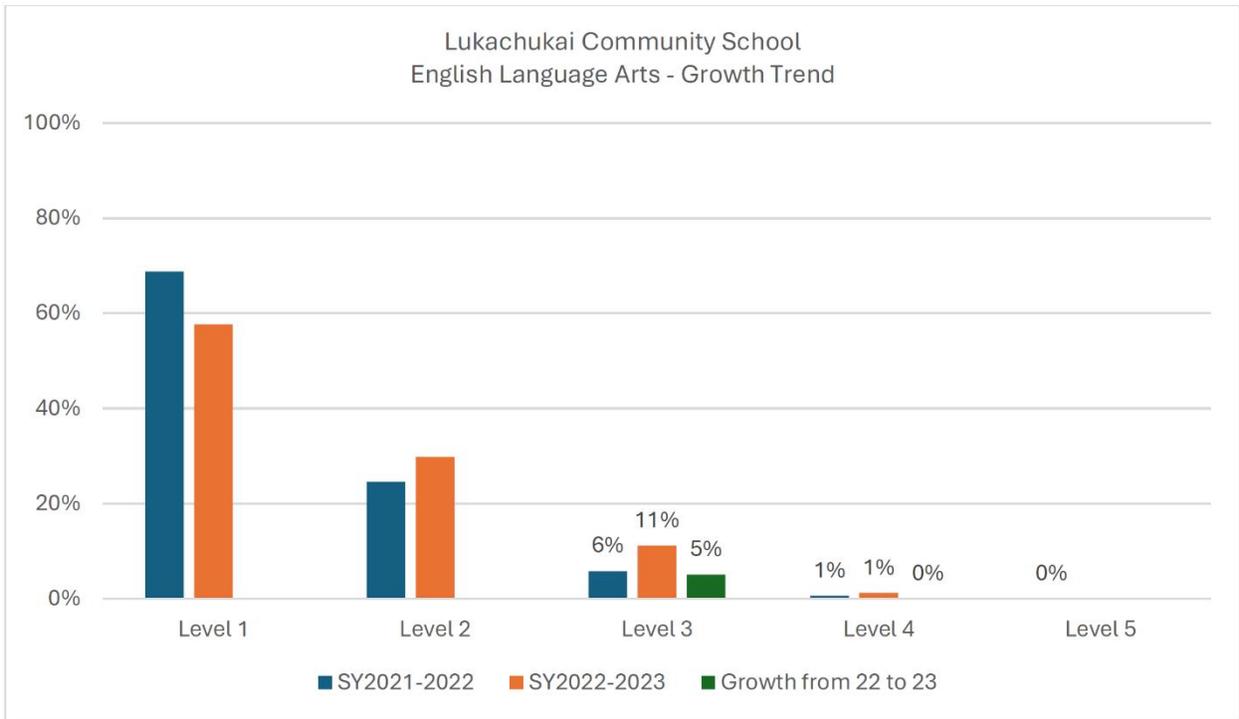
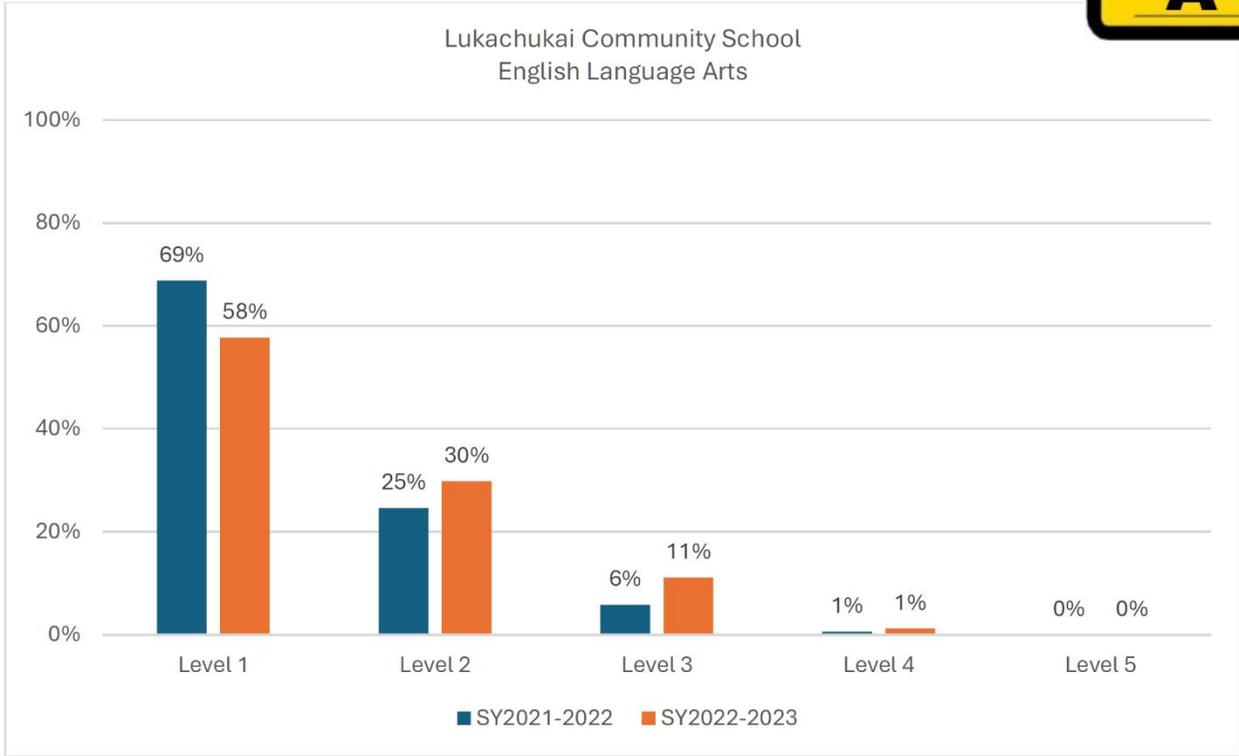
Responsible Persons: Human Resources Manager, Renee Begay

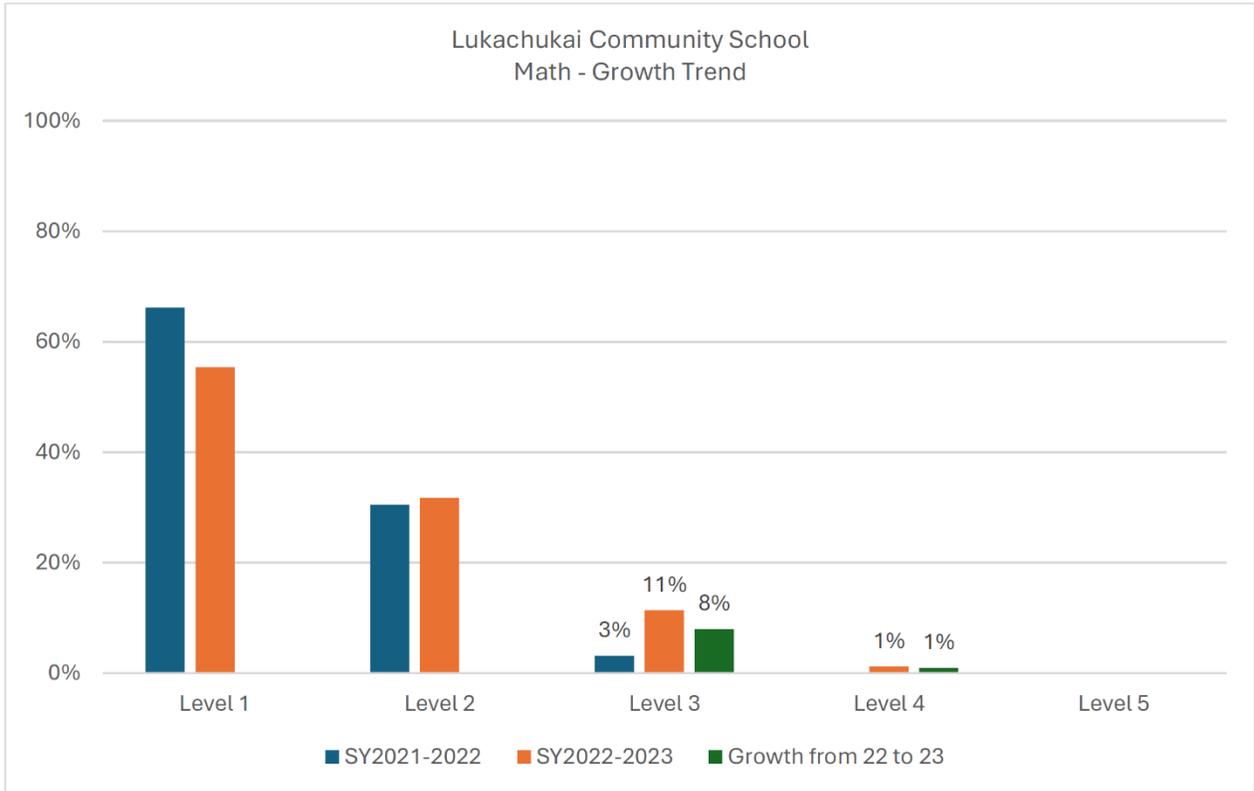
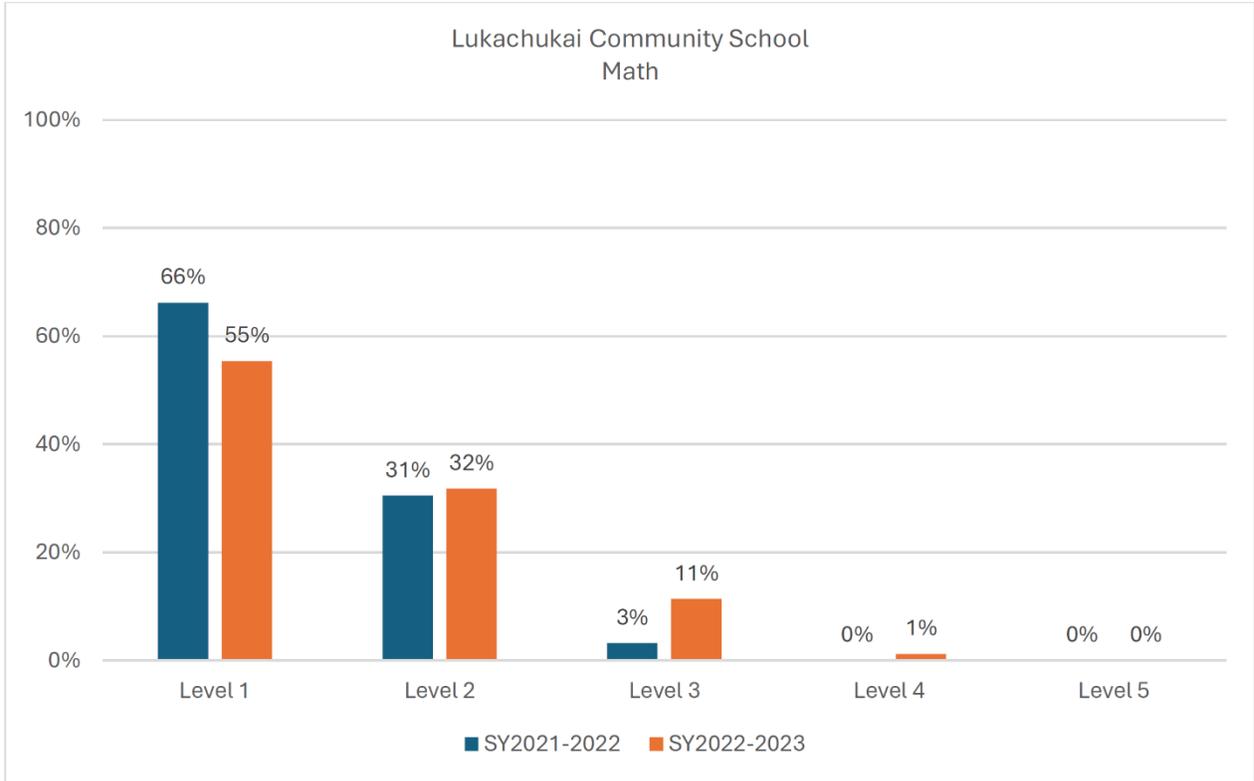
Anticipated Completion Date: June 2024

Planned Corrective Action: The School has hired a new Human Resource Manager and has the experience and training to ensure character investigations are completed that comply with the Indian Child Protection and Family Violence Protection Act and the investigations are appropriately documented before completing the hiring process. The school will also comply with the Act which states the School may employ individuals in those positions only if the individuals meet standards of character, no less stringent than those prescribed under subpart B – Minimum Standards of Character and Suitability for Employment (25 CFR part 63).

**LUKACHUKAI COMMUNITY SCHOOL, INC.
SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS**

Prior Year Audit Findings	Status
2022-001 2021-001 and 2020-001 Account Reconciliations	Repeated
2022-001 and 2021-003 Special Test and Provisions Test work	Repeated





Performance Level Indicators

Level 1: Did not yet meet expectations

Level 2: Partially met expectations

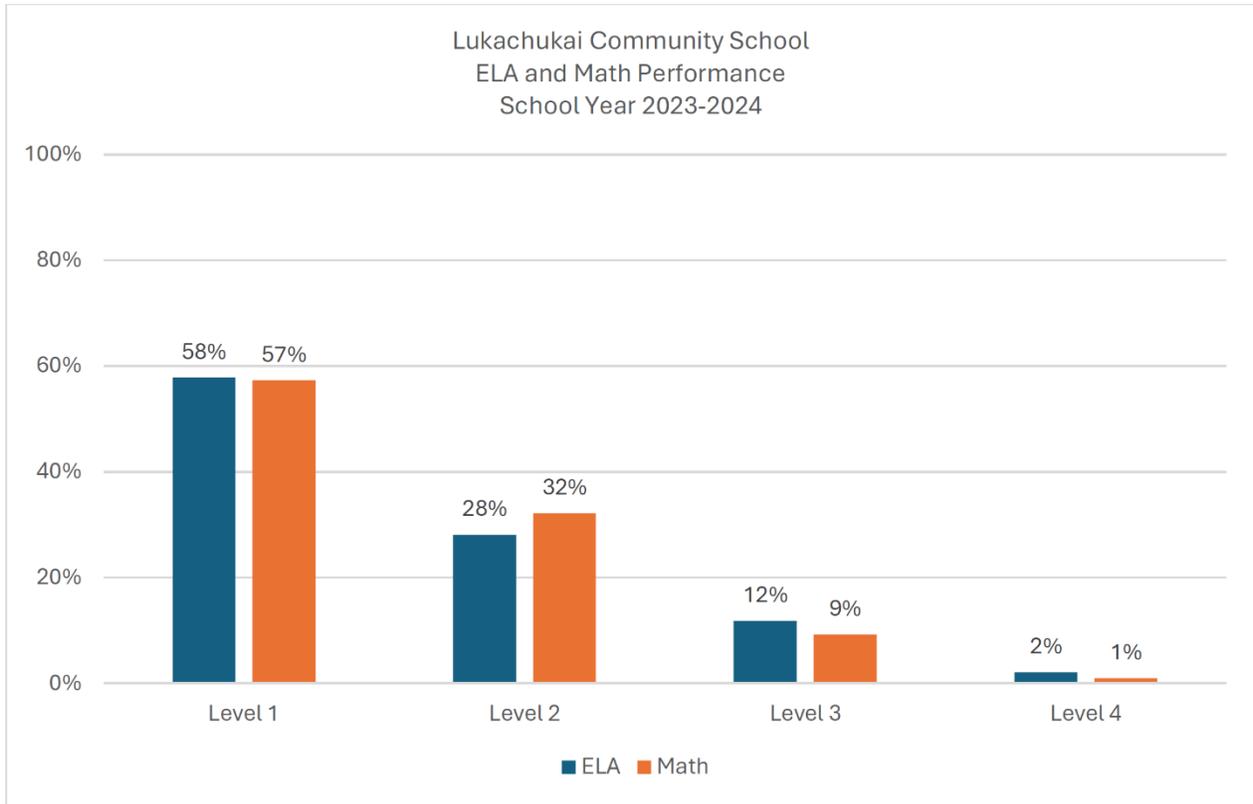
Level 3: Approached expectations

Level 4: Met expectations

Level 5: Exceeded expectations

Number of Students Tested

School Year	ELA	Math
SY21-22	154	154
SY22-23	161	157



Performance Level Indicators

Level 1: Did Not Yet Meet Expectations

Level 2: Partially Met Expectations

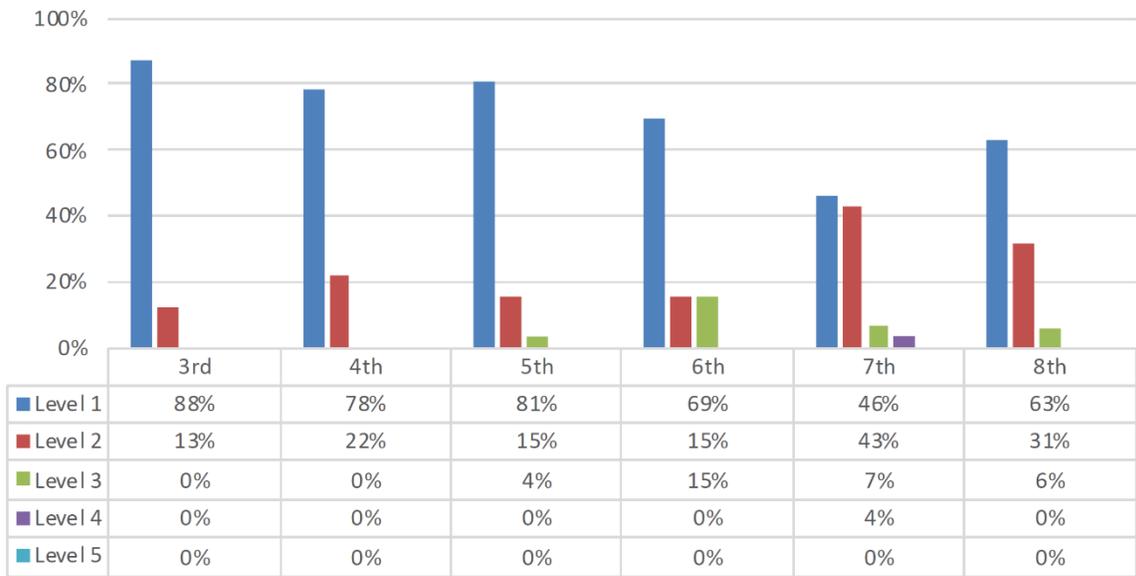
Level 3: Met Expectations

Level 4: Exceeded Expectations

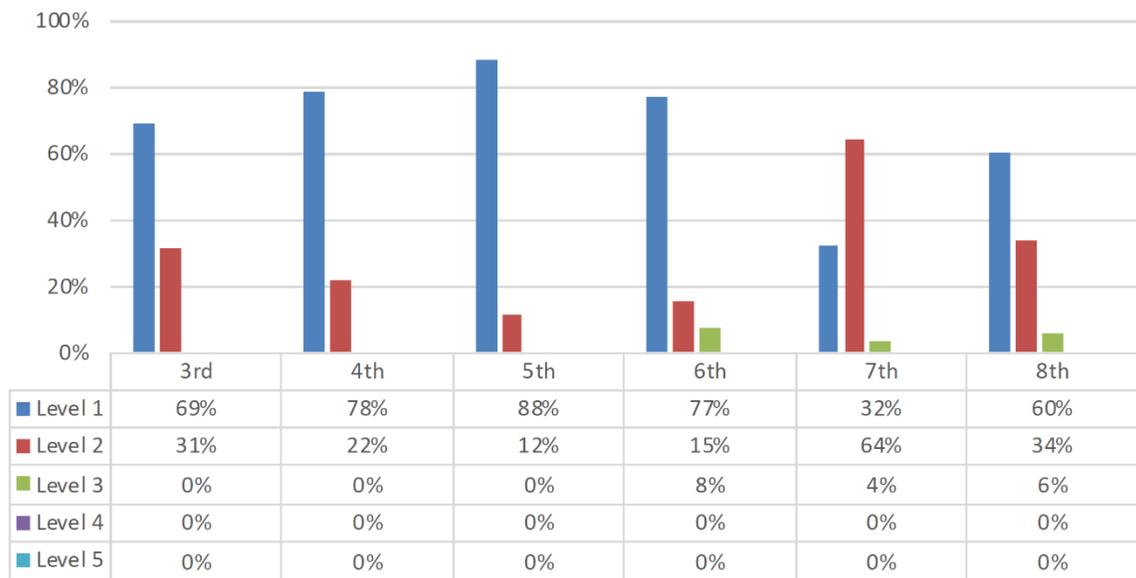
Number of Students Tested

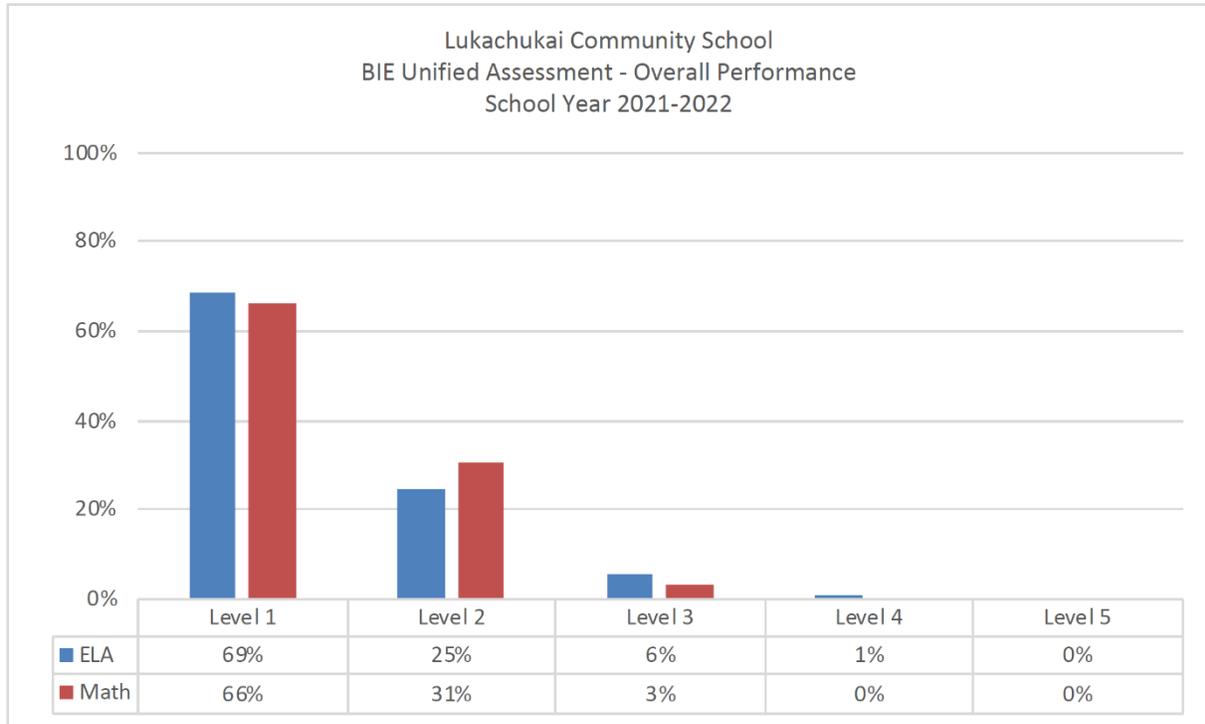
School Year	ELA	Math
SY23-24	185	183

Lukachukai Community School
BIE Unified Assessment
English Language Arts



Lukachukai Community School
BIE Unified Assessment
Math





Performance Level Indicators

Level 1: Did not yet meet expectations

Level 2: Partially met expectations

Level 3: Approached expectations

Level 4: Met expectations

Level 5: Exceeded expectations

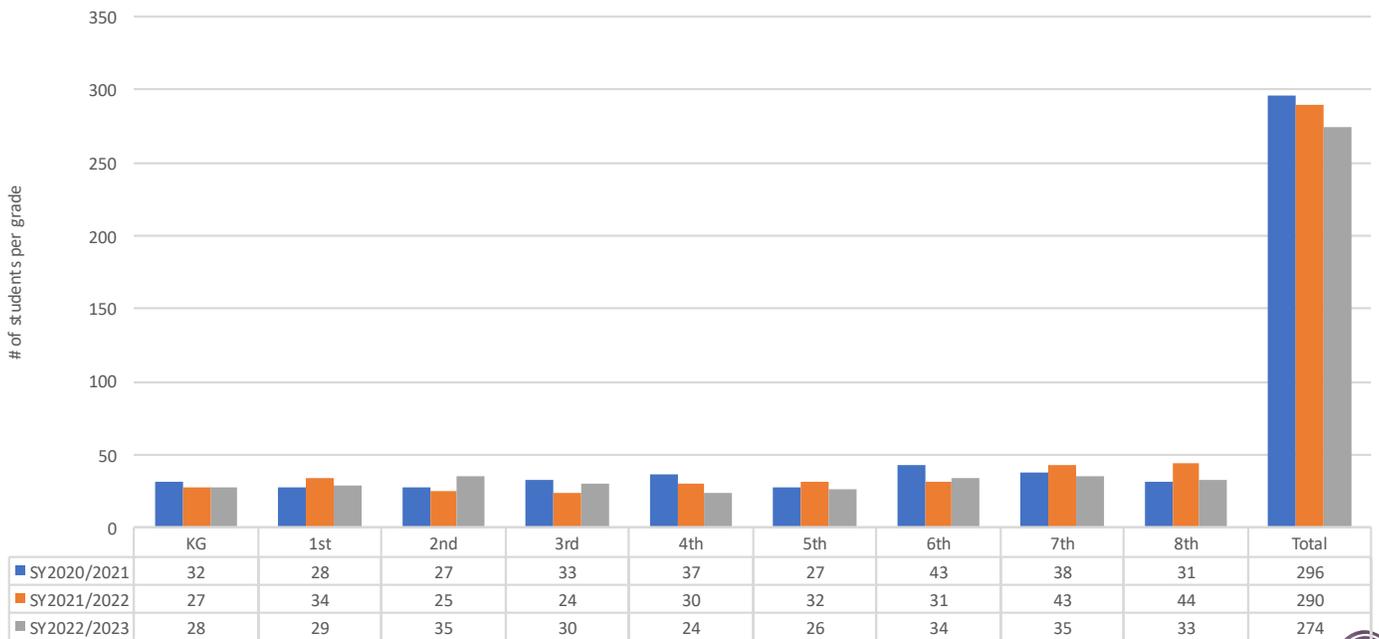
Lukachukai Community School had a total of 154 students that tested in ELA and 154 students that tested in math.

Teacher Count

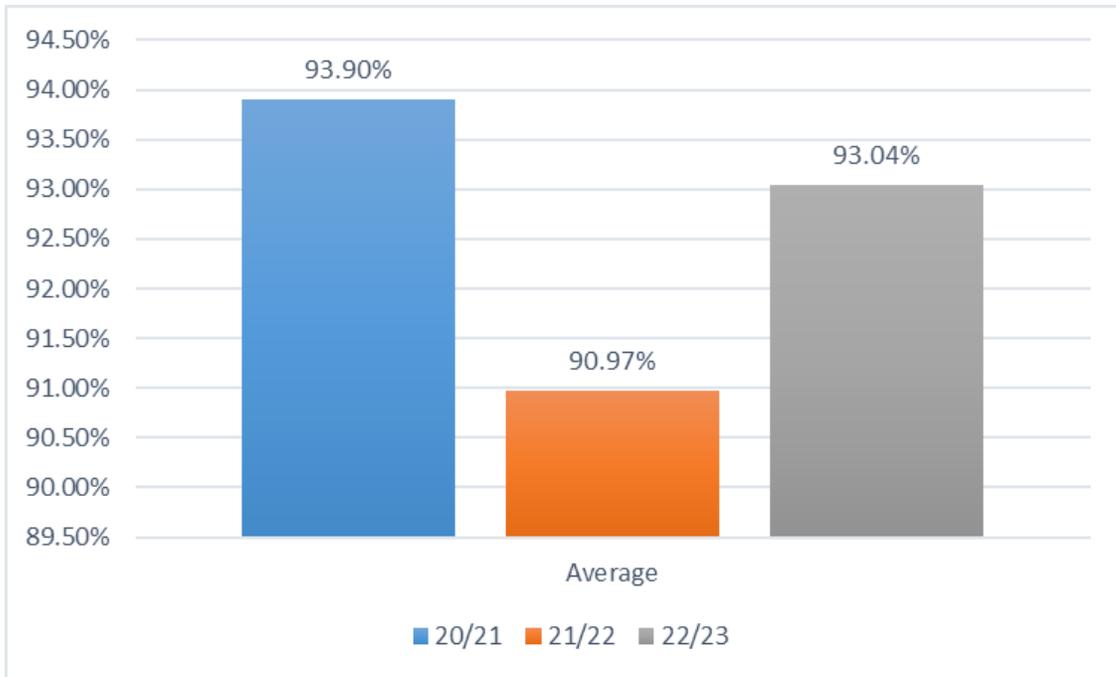
Grade Level Teachers:		Specialty Teachers:	ESS Teachers:
Kindergarten (2)	Seventh Grade (2)	Art (1)	Jr. High (1)
First Grade (2)	Eighth Grade (2)	Computer (1)	Coord/Teacher (1)
Second Grade (2)			
Third Grade (2)		Navajo Culture/Language:	
Fourth Grade (2)		K-4th (1)	
Fifth Grade (2)		5th-8th (1)	
Sixth Grade (2)		Total Number of Teachers	24



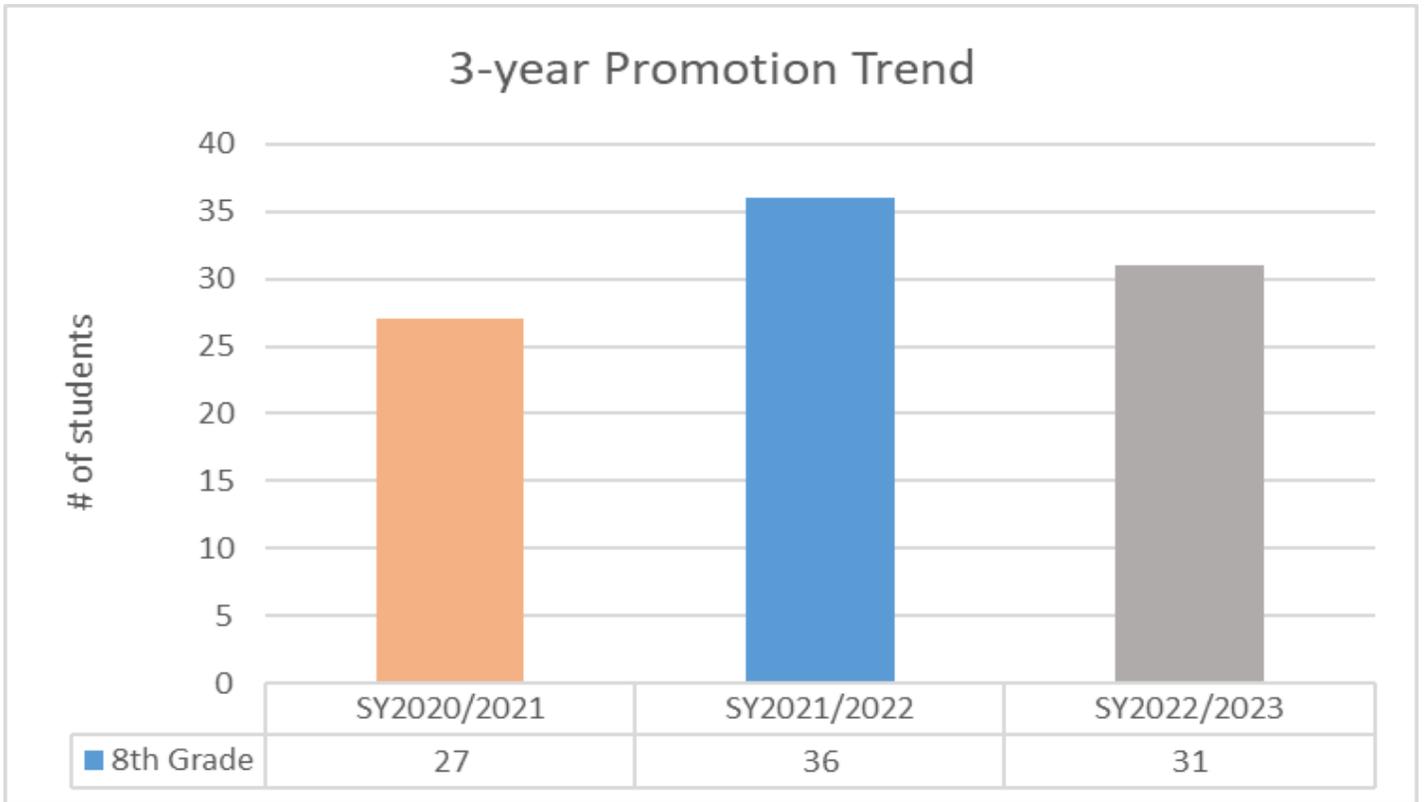
3 – Year Enrollment Trend



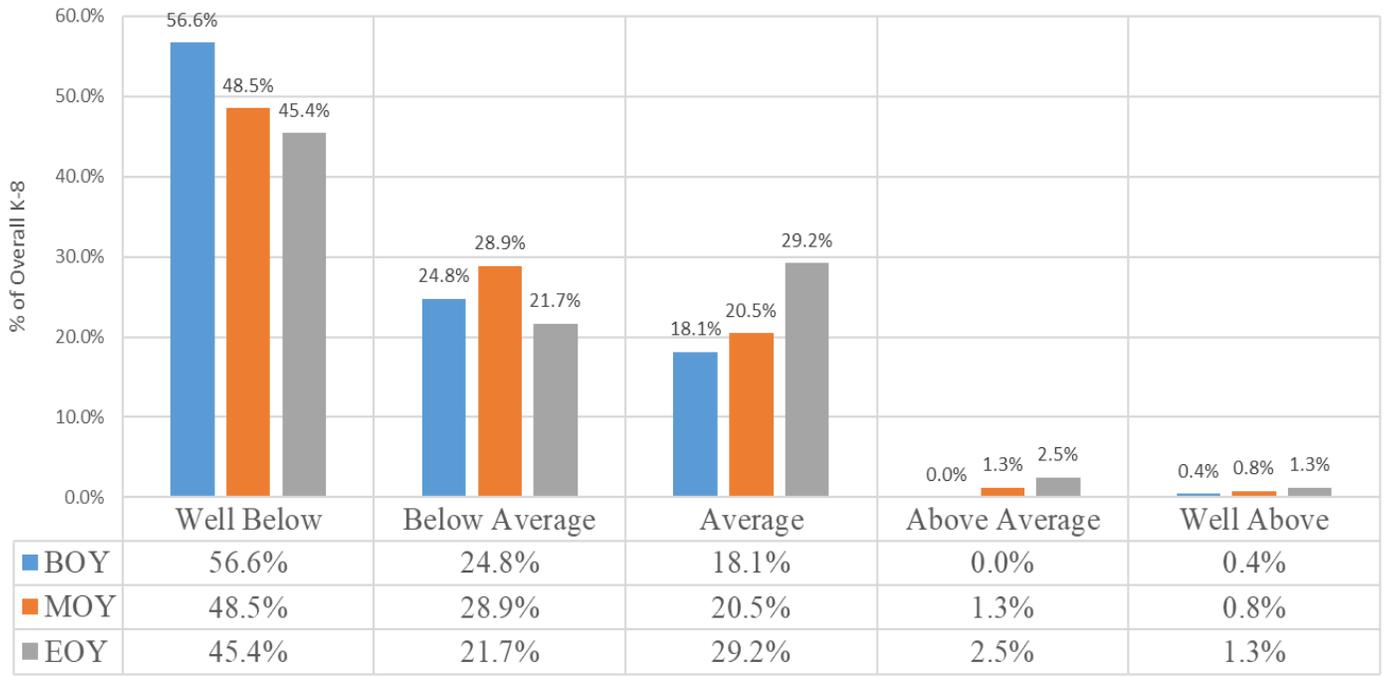
3 – Year Attendance Trend



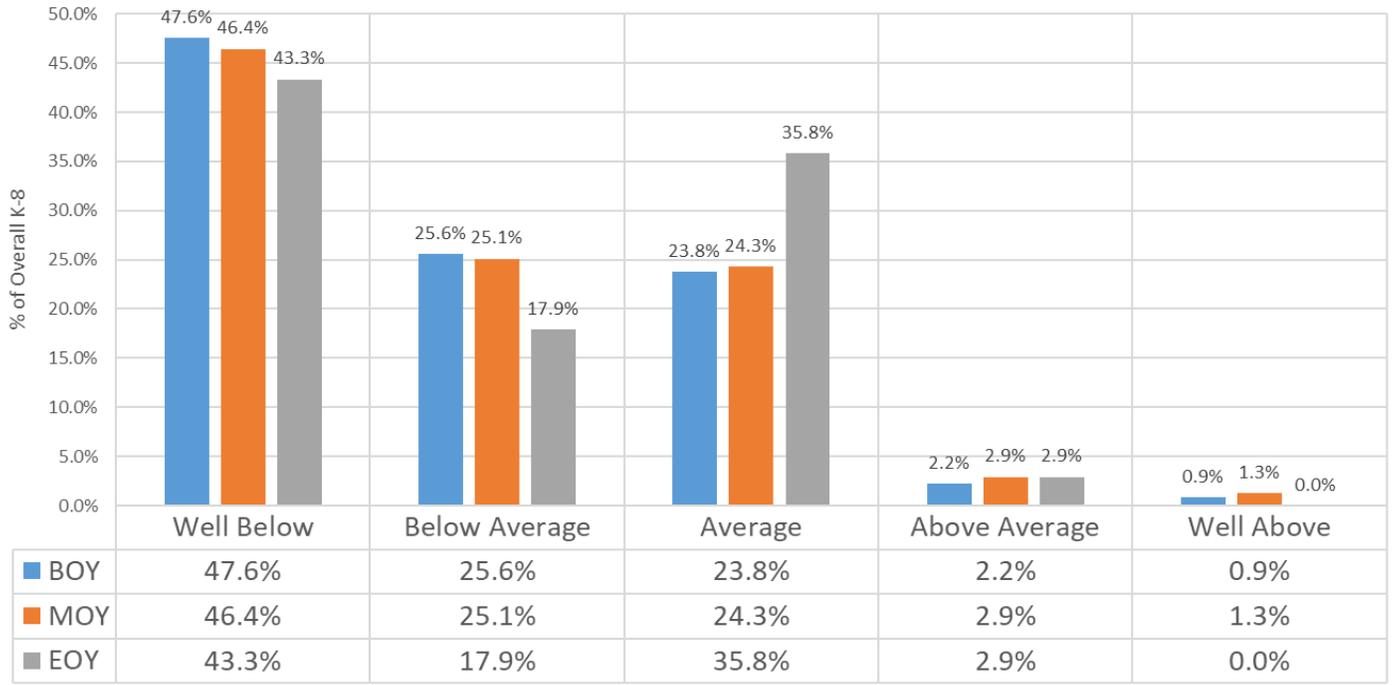
3-year Promotion Trend



Overall Comparison of AIMS WEB PLUS MATH
2022-2023



Overall Comparison of AIMS WEB PLUS READING
2022-2023



**SY 2022-2023 Reauthorization of School
Office of Diné School Improvement**

School Name:	Lukachukai Community School								
Assigned ODSI Staff:	Dorthea Litson								
To be granted one (1), two (2), or four (4) years recommended with the following conditions:									
<input type="checkbox"/> One year <input type="checkbox"/> Two years <input type="checkbox"/> Four years									
• Focal School Agreement Signed:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No								
• Data Team Established:	<input checked="" type="checkbox"/> Yes, their school leadership team is their data team. <input type="checkbox"/> No								
• Completion of Using Data Process Tasks:	The Data/Leadership Team is not fully train in the Using Data Process tools, however, are using certain components that are being utilized to analyze data.								
• Academic Inventory:	Analyze Data		School Action Plan			Curriculum Align			
		Yes	No		Yes	No		Yes	No
	BOY	X		ELA	X		ELA	X	
	MOY	X		Math	X		Math	X	
	EOY	X		*Science			*Science		
*Science - only if applicable									
• Academic Proficiency in Math met	<input type="checkbox"/> Met <input checked="" type="checkbox"/> Not Met								
• Academic Proficiency in English Language Arts met	<input type="checkbox"/> Met <input checked="" type="checkbox"/> Not Met								
• Academic Status (Is academic growth happening?):	<input type="checkbox"/> Yes <input type="checkbox"/> No BIE determines academic status								
• Comment: (Explain to work conducted at school site)	Analyzed Data: <ul style="list-style-type: none"> Summative Assessment Data for Spring 2022 BIE READS and BIE MATH Benchmark Assessment Data for 2022 - 2023 BOY, MOY, & EOY Renaissance Star Assessment School Action Plan: <ul style="list-style-type: none"> This school has School Action Plan for Reading and Math. Curriculum: This school is using Beyond Textbook Series as their curriculum for reading and math. Technical Assistance:								

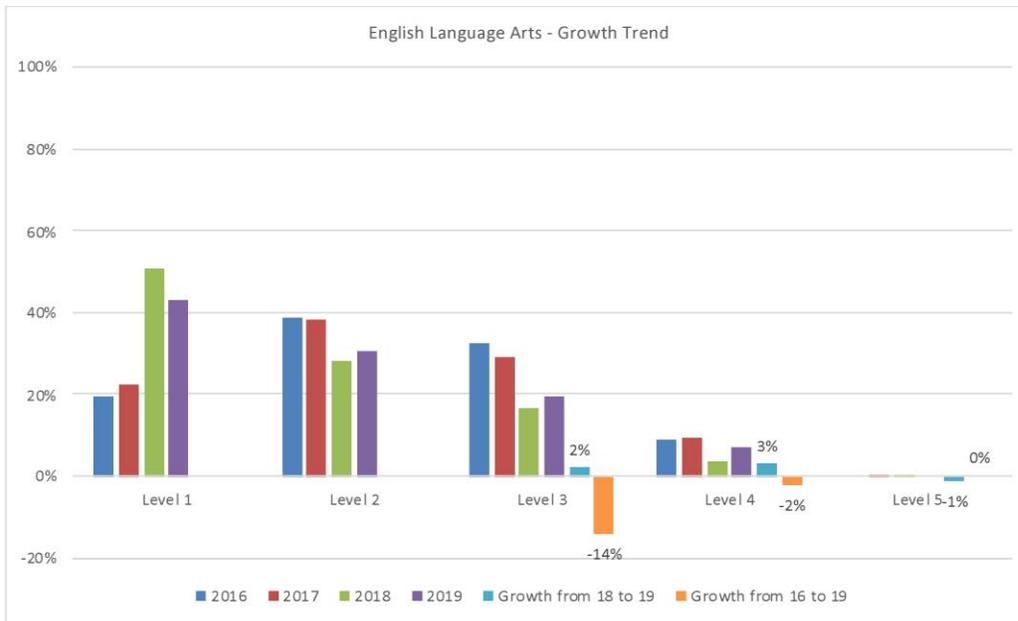
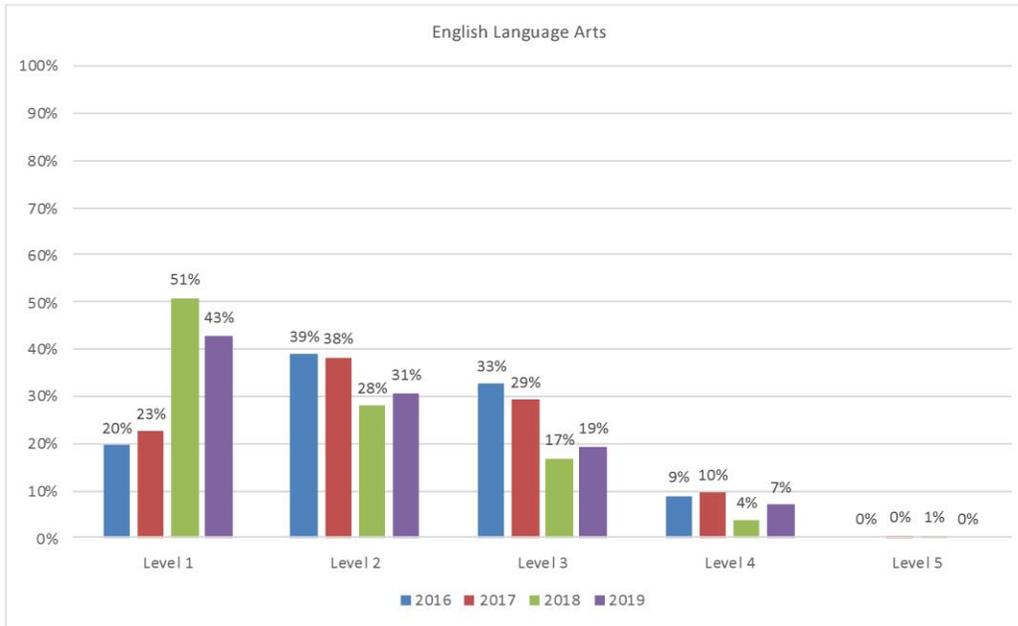


Navajo Nation Grant School Reauthorization—Lukachukai Community School
 Grade Level: K-8 State Assessment: PARCC

Demographics:

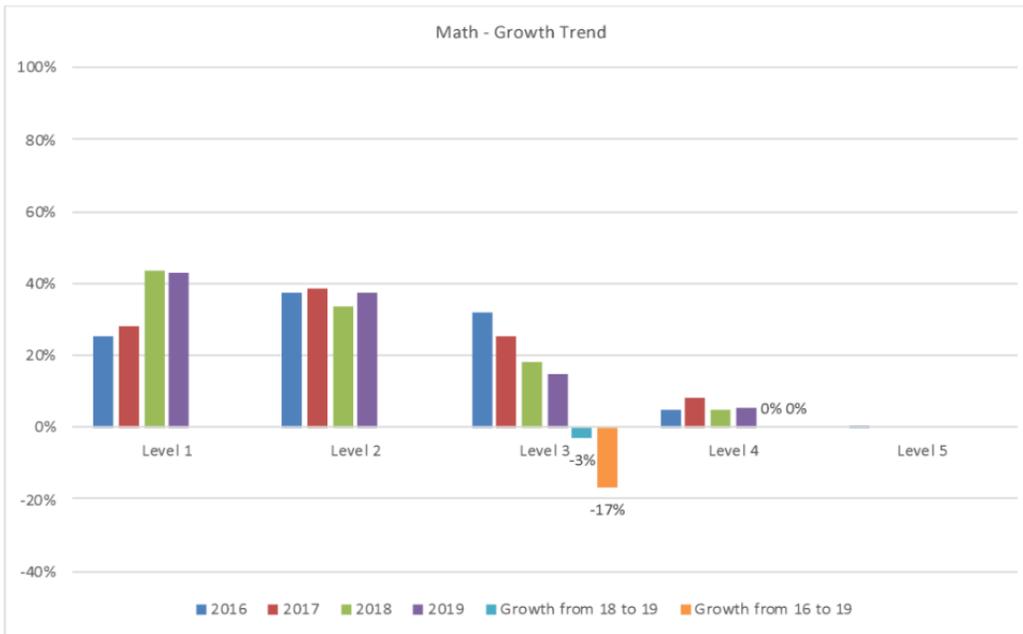
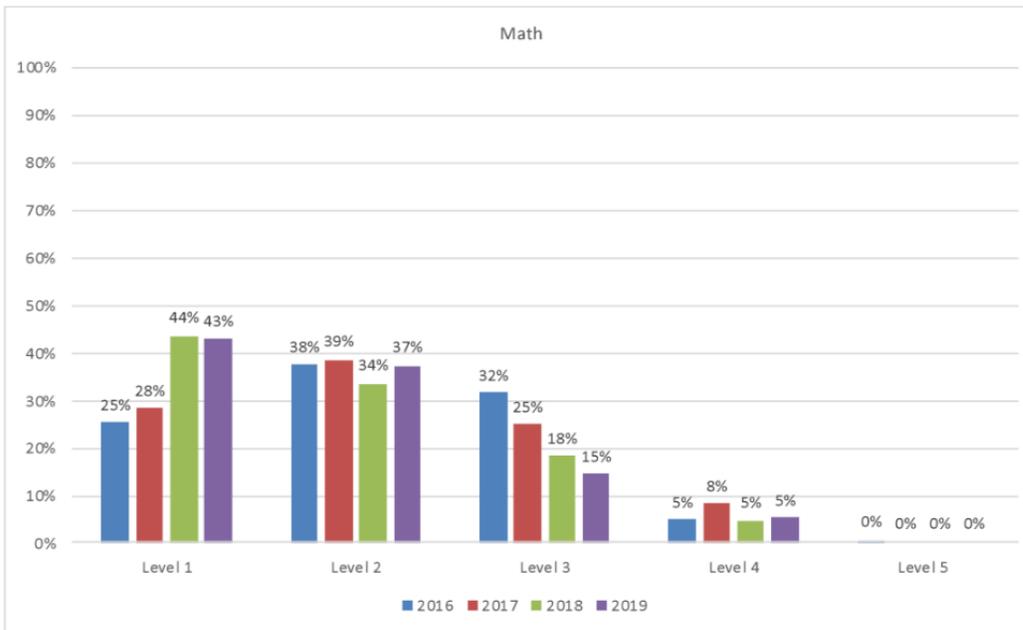
Enrollment: Attendance Rate: Drop Out Rate:
 Teacher Count: Graduation Rate:

English Language Arts - PARCC 2018-2019					
	# of Students Tested	Level 1	Level 2	Level 3	Level 4/5
All Students	212	91	65	41	15
Female	102	34	32	26	10
Male	110	57	33	15	5



Math - PARCC 2018-2019

	# of Students Tested	Level 1	Level 2	Level 3	Level 4/5
All Students	212	91	79	31	11
Female	102	37	44	14	7
Male	110	54	35	17	4





Department of Dine Education
Office of Standards, Curriculum & Assessment Development (OSCAD)
Rubrics for Reauthorization SY 2022-2023



name of School: Lukachukai Community School

Reauthorization Dates: April 24, 2025

CRITERIA	EMERGING	APPRENTICE	PROFICIENT	EXEMPLARY
<p>SCHOOL COMPREHENSIVE PLAN</p> <p>Dine Bizaad doo bee' o'ool'vill Bee'oonish</p> <p>Dine Values of Life-Long Learning</p>	<p>None or very limited language/culture plans included in School Comprehensive Plan</p>	<p>Includes two of the following:</p> <ol style="list-style-type: none"> 1. Technical support/management 2. School Board & Admin & budget support 3. In vision and mission statements 4. DODE & school collaboration 5. Parent/community participation 6. Monitoring of language/culture implementation (learning, teaching effectiveness, curriculum). 	<p>Includes three of the following list:</p> <ol style="list-style-type: none"> 1. Technical support/management 2. School Board & Admin. & budget support 3. In vision and mission statements 4. DODE & school collaboration 5. Parent/community participation 6. Monitoring of language/culture implementation (learning, teaching effectiveness, curriculum). 	<p>Full implementation of the following:</p> <ol style="list-style-type: none"> 1. Technical support/ management 2. School Board & Admin. & budget support 3. In vision and mission statements 4. DODE & school collaboration 5. Parent/community participation 6. Monitoring of language & culture implementation (learning, curriculum, teaching effectiveness).
<p>TEACHER 520 or DLCA CERTIFICATION</p>	<p>Admin or staff recently became aware of Native American Language & Culture Certification & plans to notify staff.</p>	<p>Have signed documents or contacted DODE for Dine Language & Culture Certification.</p>	<p>Native American Language & Culture Certification application in process for all Dine Language & Culture teachers.</p>	<p>All Dine Language & Culture teachers have Native American Language & Culture certification on file with the school.</p>
<p>CURRICULUM & ASSESSMENT</p>	<ol style="list-style-type: none"> 1. No DL&C curriculum & assessment 2. No materials & resources to support the DL&C program 3. Not familiar with DCS 4. Inconsistent schedule of language & culture study 5. Teacher given other assignments; (e.g., substitute teaching, classes conducted only once a week. 	<ol style="list-style-type: none"> 1. DL&C Curriculum development in preliminary planning. Discussion and/or planning is taking place for assessment 2. Few materials & resources to support the DL& C program 3. Aware of DCS and is being implemented in DL&C classroom (s) 4. Inconsistent schedule of language & culture study 5. Teacher given other duties DL&C classes scheduled for 30 minutes or less daily. 	<ol style="list-style-type: none"> 1. DL&C curriculum & assessment is planned and in the process of being implemented 2. Some materials & resources; available to support the DL&C program 3. Familiar with DCS and is being implemented in DL&C class(s) and across grade levels 4. Consistent 45 minutes or more language & culture study daily schedule 5. Teacher given responsibility to teach language & culture only). 	<ol style="list-style-type: none"> 1. DL &C curriculum is fully implemented and integrated into all grade levels. 2. Local developed assessment is utilized to monitor student progress. 3. Ample supply of materials & resources across all grade levels. 4. Very familiar with DCS and are fully implemented across all grade levels. 5. Consistent 60 minutes or more DL&C instruction daily for each grade level and/or implementation of language immersion program. 6. Teacher given responsibility to teach language & culture only.
<p>ASSESSMENTS ONL-C-T-SBA-Required</p>	<ol style="list-style-type: none"> 1. Has not administered any of the DODE developed DL&C assessments. (ODLA, DLPA, ONL-C-T-SBA) 2. No evidence of data on file with OERS. 	<ol style="list-style-type: none"> 1. Has administered one of DODE (DLPA, ONL-C-T-SBA). 	<ol style="list-style-type: none"> 1. Has administered one of DODE (DLPA, ONL-C-T-SBA) 2. Assessment data are shared with all staff, students, stakeholders. 	<ol style="list-style-type: none"> 1. Has administered one of DODE (DLPA, ONL-C-T-SBA) 2. Assessment data are shared with all staff, students, stakeholders 3. Use assessment data to inform, improve instruction and curriculum. 3. Use assessment data to inform, improve instruction and curriculum.



**Department of Dine Education
Office of Standards, Curriculum & Assessment Development (OSCAD)
Rubrics for Reauthorization SY 2022-2023**



PROFESSIONAL DEVELOPMENT	1. No language & culture professional development provided for staff. 2. Staff do not participate in OSCAD sponsored PDs and/or elsewhere specific to DL&C.	1. Provides one- two sessions of school- initiated language & culture PDs for staff. 2. Staff participate in one-two OSCAD sponsored PDs and/or outside DL&C PDs.	1. Provides three or four sessions of school-initiated language & culture PDs for both DL& C staff and regular staff. 2. Staff participate in outside DL&C trainings including OSCAD sponsored PDs.	1. Language & culture PDs included in overall school comprehensive plan and fully implemented.
Documentation Review School Action Plan <ul style="list-style-type: none"> Technology support & management (School Board, Administration, Budget) Philosophy & Vision DODE & school collaboration Monitoring of language & culture program Certification <ul style="list-style-type: none"> Native American Language & Culture Certification (NALCC) (everyone must have) Professional Development <ul style="list-style-type: none"> Teaching Strategies Diné Content Standards Curriculum mapping Assessment Types Lesson planning Material Development Curriculum/Assessment <ul style="list-style-type: none"> Materials & Resources Aligned to DSC Daily Schedule 	1. Evidence (List reasons/ evidence why certain category from above was chosen) <ul style="list-style-type: none"> Classroom observed in higher grade level displayed teacher spoke in Diné 100% of the time, the lower level spoke Navajo 95%-98% of the time. Students followed instruction well. Teachers participates in PD provide by OSCAD. A school wide schedule was provided. 2. Recommendations: (conditions or sanctions, etc.) Teachers need to have a restroom break and good planning time.	3. Commendation <ul style="list-style-type: none"> There are three DLC teachers who posses 520 certification from the Navajo Nation Teachers participated in the professional development training hosted by OSCAD. Lesson Plans are submitted weekly. Teachers are fluent in Diné language and the students were engaged. 		

LUKACHUKAI COMMUNITY SCHOOL
DINE' LANGUAGE PROFICIENCY ASSESSMENT (DLPA)
OVERALL PROFICIENCY LEVEL RESULTS FOR PRE & POST
GRADES K, 4TH & 8TH

School Year 2022-2023



Office of Standards,
Curriculum &
Assessment Development

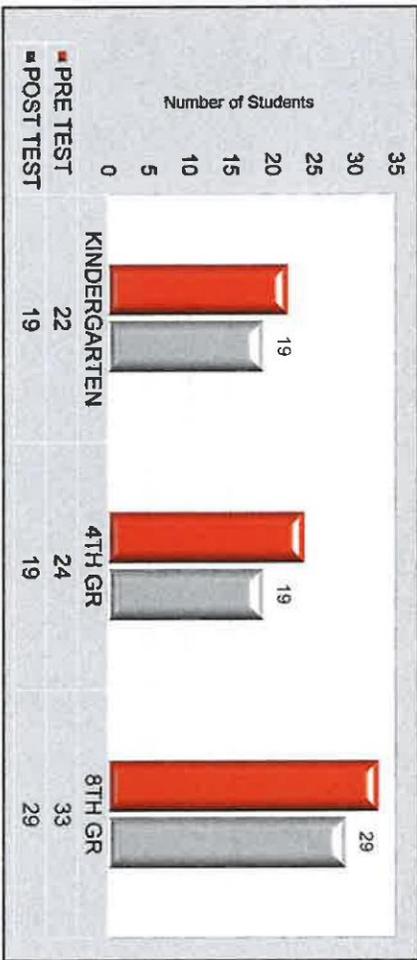
Lukachukai Community School

Dine' Language Proficiency Assessment (DLPA) ^Ó

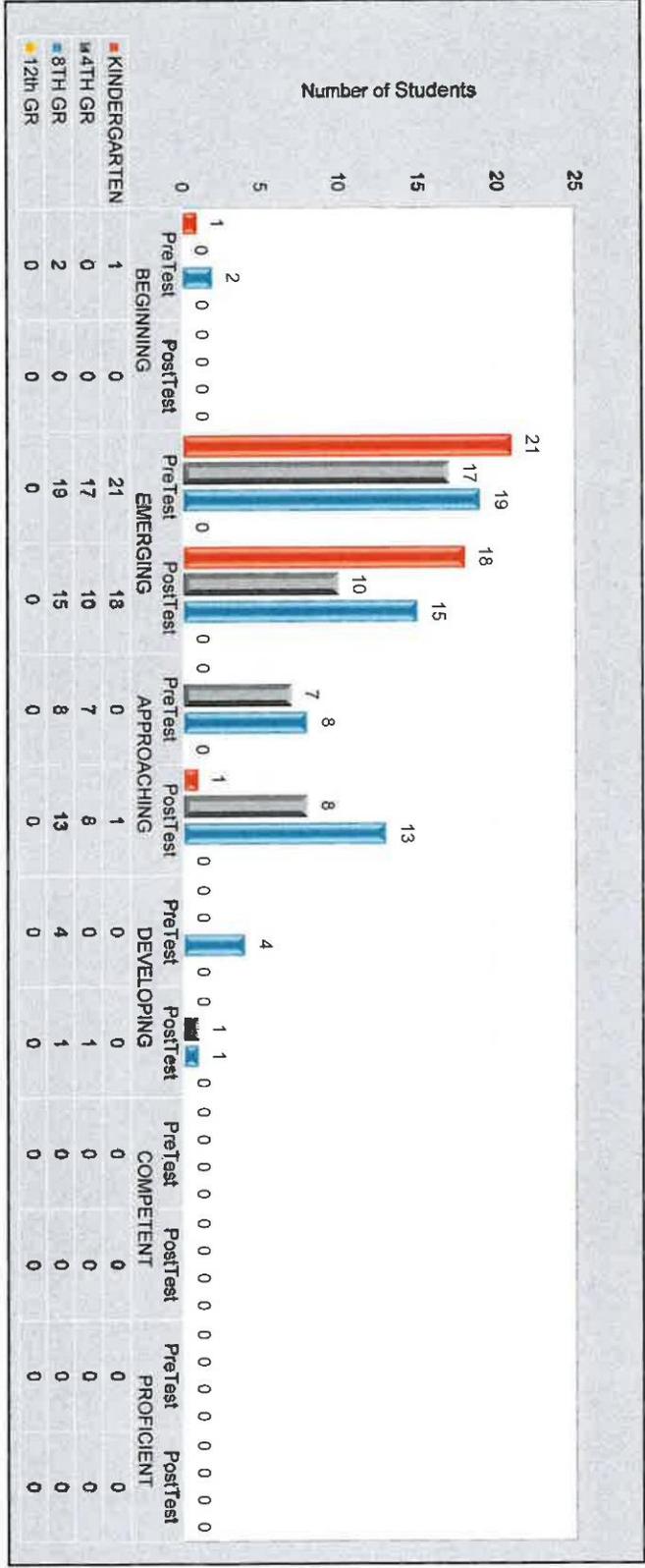
Total Number of Participating Students per Grade Level K, 4th & 8th

School Year 2022 - 2023

LUKACHUKAI COMMUNITY SCHOOL		PRE TEST	POST TEST
KINDERGARTEN		22	19
4TH GR		24	19
8TH GR		33	29
		79	67



Lukachukai Community School Dine' Language Proficiency Assessment (DLPA) Pre & Post Overall Proficiency Results for Grades K, 4th & 8th



July 31, 2023

Lukachukai Community School
Navajo Indian Route 13
Lukachukai, Arizona 86507

Dear Administrator:

The Cognia Global Commission, using information from your recent Accreditation Engagement Review Report and recommendations from the Cognia Accreditation Offices, has placed your institution on a status of *Accredited Under Review*. This action was ratified at the July 31, 2023, meeting of the Cognia Global Commission.

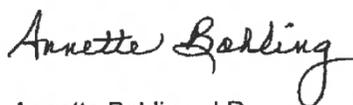
This action is aligned with Cognia Accreditation and Certification Policies and Procedures Policy 3.1.a.ii: "...has an IEQ score that falls below an acceptable range as determined by Cognia and/or documented levels of poor/unsatisfactory performance results."

As a result, you will be required to submit a progress report to Cognia that addresses Areas for Improvement as identified in the Accreditation Engagement Review Report, providing documented evidence of substantially meeting Cognia Policies, Standards and Assurances. Your institution will also be required to complete an on-site Monitoring Review within one year of the previous review and host subsequent Monitoring Reviews as prescribed by Cognia.

Please review your Accreditation Engagement Review Report for specific information regarding the Standards and/or criteria that will need your attention and action prior to the Monitoring Review.

We are available to assist you in your efforts towards continuous improvement and can be reached at +1.678.392.2285 or accreditationservices@cognia.org.

Sincerely,

A handwritten signature in cursive script that reads "Annette Bohling".

Annette Bohling, J.D.
Chief Global Accreditation Officer

THIS IS TO CERTIFY THAT

Lukachukai Community School

has met the criteria for educational quality established by the Cognia Global Commission and is hereby presented this

Certificate of Accreditation

by the North Central Association Commission on Accreditation and School Improvement, the Northwest Accreditation Commission, and the Southern Association of Colleges and Schools Council on Accreditation and School Improvement.

Valid Through 6/30/2029



Mark A. Eggen

Mark A. Eggen, Ed.D.
President and CEO, Cognia

Accreditation – Cognia Navajo Nation

- Lukachukai Community School is fully Accredited through Cognia (Formally AdvancED) to June 30, 2023.
- LCS currently is active in keeping up to date with Cognia Navajo Nation via web link and or Annual Conferences sponsored by Cognia.
- Next School Engagement Review is scheduled to happen in the SchoolYear 2022-23

Institution IEQ 324.89

AdvancED and
Measured Progress
are now

cognia™



**CONDITIONS ON SANCTIONS
OF TRIBAL ORGANIZATIONS TO OPERATE
BIA-FUNDED EDUCATION AND EDUCATION-RELATED PROGRAMS**

The Navajo Nation hereby places the following conditions on its sanction of the **Lukachukai Community School, Inc. (School)** to enter into a grant with the Bureau of Indian Affairs for the educational programs specified herein.

- a) The Superintendent of Schools shall appoint one (1) staff person from the Department of Diné Education to provide guidance and assistance to the **Lukachukai Community School, Inc.**, in the preparation of the required documents for future reauthorization, compliance with federal and Navajo Nation laws, and, upon request, to assist with any negotiations of the terms and conditions of the proposed grant with the Bureau of Indian Affairs; and,
- b) The Department of Diné Education shall ensure compliance by the **Lukachukai Community School, Inc.** through monitoring and enforcement of the following mandatory provisions:
 - I) The **Lukachukai Community School, Inc.** shall, in the operation of the above noted programs, meet the academic standards established by the Navajo North Central Association, or such other minimum academic standards which may be established by the Navajo Nation Board of Education, and the BIA national dormitory criteria, if applicable; and,
 - II) The **Lukachukai Community School, Inc.** shall have conducted an annual audit, which meets the requirements of the federal Single Audit Act, and which shall be submitted on an annual basis to the Navajo Nation Department of Diné Education for verification and monitoring; and,
 - III) The **Lukachukai Community School, Inc.** shall respond to all audit findings and observations within ninety (90) days, including the development of a corrective action plan providing for the timely correction and/or resolution of all audit findings and observations, and shall provide a copy of its responses to the Department of Diné Education; and,
 - IV) The **Lukachukai Community School, Inc.** shall respond to any directives of the Navajo Nation Board of Education and/or Health, Education, and Human Services Committee related to this reauthorization within ninety (90) days, unless otherwise stated in the directive itself, and shall provide copies of its responses to the Department of Diné Education; and,
 - V) In the event there is a proposed amendment to the grant that adds a program or deletes a program authorized by this resolution, the **Lukachukai Community School, Inc.** shall

request authorization from the Navajo Nation Board of Education, submitted through the Department of Diné Education.

- c) The **Lukachukai Community School, Inc.** shall provide 2 copies of all grant-related documents as required by the *Grant/Contract Conversion and Maintenance Handbook* to the Navajo Nation Superintendent of Schools, Department of Diné Education, P.O. Box 670, Window Rock, Arizona 86515 by March 31st of the year in which its presentation to the Navajo Nation Board of Education for reauthorization is scheduled; and,
- d) The **Lukachukai Community School, Inc.** shall present its proposal for reauthorization of the grant to the Navajo Nation Board of Education, which shall have the authority to approve the grant proposal, require the addition and/or deletion of terms and conditions, or decline approval of the grant; and,
- e) The **Lukachukai Community School, Inc.** shall comply with all Navajo Nation laws, including, but not limited to 10 N.N.C. §1 et seq., and 11 N.N.C. §1 et seq., as well as applicable rules established by the Health, Education, and Human Services Committee of the Navajo Nation Council; and,
- f) The **Lukachukai Community School, Inc.** shall permit representatives of the Department of Diné Education, the Navajo Nation Office of the Auditor General, and the Navajo Nation Ethics and Rules Office to conduct monitoring visits and/or have access to all grant records upon request; and,
- g) The **Lukachukai Community School, Inc.** shall provide to the Navajo Nation Superintendent of Schools a written annual report regarding all activities conducted under the grant with the Bureau of Indian Affairs for the preceding school year. This report shall be submitted no later than September 30th of each year. In addition, the **Lukachukai Community School, Inc.** shall include within the report brief descriptions of any substantial administrative, financial, and programmatic problems encountered in its operations; and,
- h) No portion of any grant funds or interest generated from funds received by the **Lukachukai Community School, Inc.** from the Bureau of Indian Education, or any Navajo Nation general funds received directly or indirectly by the **Lukachukai Community School, Inc.** shall be used to fund litigation or administrative proceedings against the Navajo Nation, its officials, employees or entities; and,
- i) No portion of any grant funds or interest generated from funds received by the **Lukachukai Community School, Inc.** from the Bureau of Indian Affairs, or any Navajo Nation general funds received directly or indirectly by the **Lukachukai Community School, Inc.** shall be used for the purpose of providing insurance coverage for members of the school board. Provided, that a board member may participate in the **Lukachukai Community School, Inc.**'s insurance plan, if the

school board agrees, and if the board member covers the entire amount of the insurance premiums from his or her personal funds; and,

- j) The **Lukachukai Community School, Inc.** shall, subject to the requirements of the federal Family Educational Rights and Privacy Act (FERPA) and other applicable federal and Navajo Nation laws, provide all requested educational records and personal information collected from students to the Navajo Nation, Department of Diné Education's Navajo Education Information System (NEIS); and,
- k) The Navajo Nation further conditions its sanction upon the agreement by the **Lukachukai Community School, Inc.** that the Navajo Nation through its Board of Education and Department of Diné Education retains the legal authority to monitor the operations and management of the **Lukachukai Community School, Inc.** to enforce Navajo Nation laws, to oversee the performance of the grant hereby approved, and to require that the **Lukachukai Community School, Inc.** make appropriate changes to the operation and management of the **Lukachukai Community School, Inc.** In the event that such changes involve revisions to the scope of the authorization of the **Lukachukai Community School, Inc.**, the Navajo Nation Board of Education, through the Department of Diné Education, shall review the issues involved and approve any revisions to the scope of the authorization; and,
- l) The sanction and authorization provided to the **Lukachukai Community School, Inc.** is strictly limited to that authority granted to operate certain specified education and education-related programs referred to in this resolution.



**ADDITIONAL CONDITIONS ON SANCTIONS
OF THE NAVAJO NATION BOARD OF EDUCATION**

The Navajo Nation Board of Education hereby places the following conditions on the **Lukachukai Community School, Inc.** in addition to the standard conditions and sanctions specified in “**EXHIBIT B.**”

The **Lukachukai Community School, Inc.** shall:

1. Provide a satisfactory report and corrective action plan to the Board, through the Department, regarding an action plan to address and resolve the significant deficiencies, material weaknesses, findings, qualified audit, and areas of non-compliance regarding their finances and audits as identified in “**EXHIBIT A-1.**” The school shall provide monthly reports to the Department regarding how they will implement and adhere to a corrective action plan.
2. Future Request for Proposals (RFP’s) for Annual Audits shall include auditing of school board stipends and travel, and full compliance with the Navajo Nation Uniform Stipend and Travel Policy (ECD-35-10). The school shall also comply with the budgetary limits and Weighted Student Unit (WSU) limits that are required pursuant to ECD-35-10.
3. Submit SF-425 Quarterly Finance Reports to Bureau of Indian Education (BIE) and the Department of Diné Education (Office of Diné Accountability and Compliance).
4. Collaborate with the Office of Standards, Curriculum, & Assessment Development (OSCAD) to enhance the learning of Diné Language and Culture, develop and implement a strong Diné Language/Culture program for the students, including incorporation of the Navajo Nation’s Five (5) Content Standards (Diné Language, Culture, Government, History, and Character) aligned to the Common Core State Standards (CCSS) into the school’s curriculum. The school shall also participate in professional development and cluster training sessions provided by the Office of Standards, Curriculum, & Assessment Development (OSCAD). The school shall provide evidence/documentation that it is complying with this requirement.
5. Provide one (1) hour of daily instruction in Diné language and culture. The school shall provide evidence/documentation that it is complying with this requirement.
6. Administer the: 1) Oral Navajo Language & Culture-Test-Standardized Based Assessment (ONLC-T-SBA) (new standardized based assessment on Dine Content Standards); and 2) Diné Language Proficiency Assessment (DLPA). The school shall submit data to the Department of Diné Education, Office of Educational Research and Statistics (OERS) and Office of Standards, Curriculum, & Assessment Development (OSCAD). The school shall also administer and submit data for other assessments that are developed by the Office of Standards, Curriculum, & Assessment Development (OSCAD). The school shall provide evidence/documentation that it is complying with this requirement.

7. Provide all requested educational records and data collected from students to the Navajo Nation, Department of Diné Education Office of Educational Research & Statistics (OERS).
8. Continue to follow all Navajo Nation, State and Federal Laws, Policies and Guidelines in operating the school.