



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR



Closeout Memorandum



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OCT 30 2024

Memorandum

To: Tony L. Dearman
Director, Bureau of Indian Education

From: Nicki M. Miller *Nicki Miller*
Acting Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Closeout Memorandum – *Review of the Bureau of Indian Education’s Analysis of Indian School Equalization Program Funds Pay Parity*
Report No. 2024-WR-033

In July 2024 we initiated a review of the Bureau of Indian Education’s (BIE’s) analysis of the Indian School Equalization Program (ISEP) funds designated to improve pay parity. The objective of our review was to verify BIE’s analysis and determine if BIE addressed the requirements of House Report 116-448.¹

House Report 116-448 directs BIE to conduct a pay parity analysis of ISEP funds from fiscal year 2010 to fiscal year 2020. The House report also directs the Office of Inspector General (OIG), upon completion of BIE’s analysis, “to conduct a review and verification of BIE’s analysis.” The House Committee on Appropriations instructed that BIE’s pay parity analysis include:

- BIE pay rate for teacher and counselor salaries;
- Department of Defense (DoD) pay rate for teacher and counselor salaries;
- The amount of funding provided for teacher and counselor pay parity in annual budget requests and actually provided with available funds;
- The amount of annual funding spent on BIE-funded schools non-salary expenses (including student services, safety, programming, and other standard operations);
- The impact that any shortfall of ISEP funds required for pay increases had on school services and programming; and
- A complete accounting of any amounts BIE-funded schools may not have received because fixed costs increases that align with DoD teacher and counselor pay parity requirements were not included in annual budget requests.

The House and Senate Appropriations Committees directed BIE to produce the report no later than April 26, 2021.²

On October 12, 2022, BIE notified us that it had completed its analysis and was ready for our review and verification.³ We met with BIE in May 2024 and requested BIE’s analysis, which was provided to us later that month.

¹ H.R. Rep. No. 116-448, at 65 (2021).

² Joint Explanatory Statement, Division G, at 45, accompanying Pub. L. No. 116-260, Consolidated Appropriations Act, 2021. (“The agreement directs the Bureau to produce the report directed by House Report 116-448 . . . no later than 120 days from enactment of this Act.”)

³ As a result of the notification, we included a review of BIE’s analysis in our fiscal year 2023-2024 oversight plan.

Upon review, we found that BIE did not maintain supporting documentation related to the information in the report. Specifically, it could not provide the source for data, tables, charts, images, or facts used within the report. We asked BIE to provide evidence to support its analysis and methodologies, and we provided examples of appropriate supporting documentation. For example, BIE's report detailed a comparative analysis of teacher salaries at Bureau-operated schools and Tribally controlled schools. While BIE was able to demonstrate that figures in the analysis originated from a spreadsheet, it could not provide source data to support the figures used in the spreadsheet or a methodology as to how the data was used or what it represented. The BIE budget analyst that performed the analysis told us that there were no documented methodologies for the analysis and was not aware the analysis was to be shared beyond their supervisors or was to be made a public-facing document. The analyst stated the report was incomplete as it did not include recommendations, and it had not been edited or peer reviewed.

Consequently, we are unable to conduct a verification of BIE's analysis, and we are closing this assignment. We request that BIE notify OIG when the pay parity analysis and supporting documentation are available for verification. Prior to notifying us, BIE should ensure that:

- All quantitative and qualitative data, tables, charts, images, and facts have supporting documentation and that documentation is traced to exact locations in the pay parity analysis report;
- Any supporting spreadsheets or calculations BIE performs are accompanied by all source data used to complete the spreadsheets or calculations;
- Methodologies for all spreadsheets and calculations are completed, which should include a step-by-step walkthrough of source data used, how each spreadsheet and calculation was completed, and what these data and calculations represent;
- All elements of the analysis directed by House Report 116-448 are completed for fiscal year 2010 through fiscal year 2020; and
- Clear explanations are provided for why data was not available or work was not completed for any analysis that BIE is unable to complete in response to House Report 116-448.

We appreciate the cooperation and assistance provided by BIE staff during our review. If you have any questions regarding this memorandum, please contact me at aie_reports@doioig.gov.



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