

California Indian Education Centers Program

A Sunset Review

Office of the Legislative Analyst
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Introduction

Introduction

This report contains our findings and recommendations regarding the California Indian Education Centers program pursuant to the "sunset" review procedures enacted by Chapter 1270, Statutes of 1983 (Senate Bill 1155). The program was established to strengthen the delivery of instructional services to Indian students within the public schools through the use of educational resource centers. It is scheduled to "sunset" on June 30, 1989.

As part of the sunset process, Chapter 1270 requires the State Department of Education (SDE) to review the Indian Education Centers program and submit its findings to the Legislature. The Legislative Analyst is also required to review the department's report and submit findings, comments, and recommendations regarding the program to the Legislature.

Specifically, Chapter 1270 requires SDE and the Legislative Analyst to address as many of the following issues as possible:

- (1) The appropriateness of formulas used to identify children who have special needs.
- (2) The appropriateness of formulas used to allocate funds and the adequacy of funding levels for the program.
- (3) The effectiveness of the program.
- (4) The appropriateness of local control.
- (5) The appropriateness of state involvement in monitoring, reviewing, and auditing to assure

that funds are being used efficiently, economically, and legally.

(6) The appropriateness of amounts spent to administer the program.

(7) The appropriateness of having SDE administer the program.

(8) The interrelationships among state and federal categorical programs providing this type of assistance.

(9) The characteristics of the target population being served by the program.

(10) The need for the program.

(11) The purpose and intent of the program.

The law also requires the report submitted by SDE to include, but not be limited to, all of the following topics:

(1) A description of the program, including a description of how it is administered at the state and local levels.

(2) The history of the program and previous legislative action.

(3) Relevant statistical data.

(4) Related federal programs.

(5) Whether there is an unmet need for the intended purposes of the program and, if any, an estimated cost of serving the unmet need.

(6) Findings regarding the program, including comments on whether any identified problems pose implementation issues, or issues that require revision of law or regulations.

(7) Recommendations of ways to improve the program while maintaining its basic purposes.

Chapter I of this report provides an overview of the California Indian Education Centers program, including its purpose, operation, and fiscal data. Chapter II contains our findings and recommendations which are separate from those of SDE. Chapter III contains the SDE's recommendations and our responses to them.

This report is based largely on our review of the SDE report. Some information contained in

the SDE report is not repeated here. We suggest, therefore, that this report be read in conjunction with the SDE report in order to obtain a more complete understanding of the program and of our comments on SDE's findings and recommendations.

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Executive Summary

Executive Summary

Program Overview and Legislative Analyst's Findings

- The California Indian Education Centers program was established in 1974 to "strengthen the instructional program within the public schools by establishing California Indian education centers." The program, comprised of 12 education centers, seeks primarily to enhance opportunities for Indian students and adults through academic tutoring and counseling. Each of the centers, according to the authorizing statute, is to serve as an educational resource in Indian communities to Indian students, parents, and the public schools.
- In 1987-88, a total of \$861,000 in General Fund support was provided for the 12 Indian education centers. These centers served approximately 2,850 Indians (2,125 K-12 students and 725 adults) at an average annual cost ranging from a low of \$162 to a high of \$1,092 per student. Typically, the type of service provided consists of one-on-one tutoring for K-12 students. Approximately 6.6 percent of the K-12 Indian population throughout the state received services from this program.
- Current law does not specify how available funds are to be allocated to eligible applicants. As implemented by the State Department of Education (SDE), funds for this program are allocated on a per project basis, rather than on the number of clients served. As a result, there is considerable variation among the centers in the number of clients served and the types of service provided. For example, one center provides tutoring services to approximately 200 K-12 students annually whereas, for the same level of funding, another center provides such services to an estimated 75 students.
- SDE's funding allocation system favors the renewal of currently-funded projects to the exclusion of new, and possibly improved, projects. Currently, funding is not based on a project's relative needs or merits. Instead, funds are allocated on the basis of a center's prior year allocation, with any overall funding increase for the statewide program distributed on a pro-rata basis to the centers. As a practical matter, a new project cannot be funded until a currently-funded project is terminated. Moreover, when a project is terminated, it has been SDE's policy to solicit applications only from agencies that would continue to serve the same geographical area.
- There are no data to indicate whether the program, as a whole, has increased the academic achievement levels and/or self-concept of its participants because there is no evaluation process.

- On a programwide basis, SDE maintains no information on the number of students receiving which types of services, or the total number of hours of service provided.
- SDE's sunset review report fully addresses only one of seven required items, and fully or partially addresses 3 of 11 optional items and, therefore, provides little analytical assistance to the Legislature in determining whether the program should be continued and, if so, how it may be improved.
- The statutory goals and objectives for the Indian Education Centers program are too broad to provide effective guidance in selecting the types of service to be provided and lack yardsticks for measuring the program's effectiveness. Further, the guidelines adopted by the State Board of Education for the administration of this program are outdated and no longer direct or reflect current operational practices.

Legislative Analyst's Recommendations

We recommend that SDE develop a detailed plan, including a funding proposal and timeline for conducting a comprehensive evaluation of the Indian Education Centers program. Such an evaluation, at a minimum, should focus on the effectiveness of the program as a whole, as well as the individual projects, in increasing the academic achievement levels and self-concept of Indians. This review would serve as a basis for the Legislature to determine the appropriate level of any future funding and the need or

desirability to revise the scope and purpose of the program.

Such an evaluation may necessitate an extension of the sunset date for the California Indian Education Centers program by up to a maximum of two years, to June 30, 1991. The Legislature has taken the first step towards implementing this recommendation by adopting language in the *Supplemental Report of the 1988 Budget Act* directing the SDE to develop a detailed evaluation plan by September 15, 1988. ♦

Chapter I

Chapter I

Program Overview

Program Purpose

The California Indian Education Centers program, established by Ch 1425/74 (SB 2264), and amended by Ch 36/77 (AB 447), and Ch 678/78 (AB 2844), provides a variety of services to Indian K-12 pupils and adults.

The authorizing statute states that the intent of the program is to "strengthen the instructional program within the public schools by establishing California Indian education centers." As required by law, the centers are located in Indian communities for the benefit of Indian students, their parents, and the public schools. The goals of the centers are to:

- (a) Improve the academic achievement of Indian students with particular emphasis on reading and mathematics;
- (b) Improve the self-concept of Indian students and adults;
- (c) Increase the employment of Indian adults;
- (d) Serve as a center for related community activities;
- (e) Provide tutorial assistance to students in reading and mathematics;
- (f) Provide individual and group counseling to students and adults related to personal adjustment, academic progress, and vocational planning;

- (g) Provide coordinated programs within the public schools;
- (h) Provide a neutral location for parent-teacher conferences;
- (i) Provide a focus for summer recreational sports and academic experience;
- (j) Provide adult classes and activities;
- (k) Provide college-related training programs for prospective Indian teachers; and
- (l) Provide libraries and other related educational material.

The law requires the State Board of Education, upon the advice and recommendations of the Superintendent of Public Instruction, to adopt guidelines for the selection and administration of the California Indian Education Centers program. The law allows any tribal group or incorporated Indian association to apply to the State Department of Education (SDE) for the establishment of an Indian education center. A provision requiring SDE to conduct an annual evaluation of the Indian education centers and report thereon to the Legislature was repealed in 1977.

As initially established, the program was restricted to funding 10 Indian education centers. Subsequent legislation deleted this restriction; in 1987-88, 12 centers were funded.

Operation and Funding

In 1987-88, the centers served approximately 2,850 Indians (2,124 K-12 students and 725 adults) at an estimated total cost of \$861,000 (excluding state administrative costs), or an average cost of \$71,750 per center. Services were provided to students attending approximately 175 different schools, located within 50 different school districts.

Typically, the type of service provided consists of one-on-one tutoring for K-12 students. Services, however, also include group tutoring, counseling, field trips, cultural enrichment activities, summer recreation, preschool learning readiness, and adult activities. On a programwide basis, however, SDE does not maintain information indicating the number of students receiving which types of services, or the total number of hours of service provided.

To qualify for the program, eligible organizations annually must submit an application for funding to SDE. Although *any* tribal group or incorporated Indian association may apply, SDE has established a policy of giving first priority to applicants currently participating in the program.

According to SDE, project funding is based on a center's prior year allocation; for the most part, centers receive the same amount as in the prior

year, with any increase in statewide program funding distributed to all centers on an equal pro-rata basis.

During 1987-88, SDE spent \$111,000 for portions of three positions in the American Indian Education Office to administer this program. These positions provided technical assistance to the centers, including two site visits per year and ongoing project monitoring.

On the local level, 11 of the 12 centers are operated by private nonprofit organizations and one is operated by a tribal association. Three of the centers are located in urban areas (population of 300,000 or more) and the remaining nine are located in predominantly rural areas (population 25,000 or less); one center is located on an Indian reservation.

Table 1 identifies each of the centers, its funding level, the geographical area served by the center and the Indian population for the county in which the center is located. Centers are located in counties where Indian students (a) constitute from a low of 0.3 percent of the county K-12 population (Los Angeles County) to a high of 13 percent of the population (Inyo County), and (b) range in absolute numbers from a low of 140 (Plumas County) to a high of 3,760 (Los Angeles County). ♦

Table 1
California Indian Education Centers
1986-87

Center	Geographical Area Served		K-12 Indian Population ^a			
			By County		Served by Center	
			Number	Percent ^b	Number ^c	Percent ^d
1. Ahmium Education, Inc.	San Jacinto Riverside County	\$74,385	984	0.6%	183	18.6%
2. Indian Action Council of Northwestern California, Inc.	Eureka Humboldt County	87,107	1,937	10.1	250	12.9
3. Indian Center of San Jose, Inc.	San Jose Santa Clara County	76,015	1,605	0.7	72	4.5
4. Lake County Citizens Committee on Indian Affairs	Clearlake Oaks Lake County	52,611	259	3.3	121	46.7
5. Lassen County American Indian Organization	Susanville Lassen County	67,203	165	3.6	100	60.6
6. Mendocino County Indian Center	Ukiah Mendocino County	47,496	782	5.4	130	16.6
7. Southern California Indian Centers, Inc.	Los Angeles Los Angeles County	69,449	3,760	0.3	133	3.4
8. Owens Valley Indian Education	Bishop Inyo County	96,003	415	13.0	500	120.4 ^e
9. Rincon Indian Education Center, Inc.	Valley Center San Diego County ^e	99,168	2,192	0.6	313	14.3
10. Roundhouse Council	Greenville Plumas County	67,657	140	3.9	75	53.6
11. United American Indian Education Center, Inc.	Sacramento Sacramento County	66,865	1,631	1.0	200	12.3
12. Viejas Indian School, Inc.	Alpine San Diego County ^e	56,841	2,192	0.6	47	2.1
Totals		\$860,620	16,062 ^f	— ^g	2,124	— ^g

^a Source: State Department of Education (SDE) 1986-87 Racial/Ethnic Distribution of Staff & Students in California Public Schools (CBEDS).

^b Percent of countywide K-12 population that is Indian.

^c Source: SDE sunset report; may include preschool students.

^d Percent of countywide Indian K-12 population that is served by the center.

^e Two centers are located in San Diego County. Together, they serve 360 K-12 Indian students, or 16 percent of San Diego County's K-12 Indian population.

^f K-12 Indian population in counties served by a center.

^g Not a meaningful figure.

Chapter II

Chapter II

Legislative Analyst's Findings

This chapter contains our findings separate from those of the State Department of Education (SDE), concerning the California Indian Education Centers program's implementation

and effectiveness. Our comments focus on elements of program implementation and effectiveness.

Program Implementation

Level of Participation. According to information provided in the SDE sunset report, in 1986-87 the Indian Education Centers program funded 12 centers throughout the state. These centers provided service to approximately 2,125 prekindergarten-through-grade 12 students attending approximately 175 different schools located in 50 different school districts. In addition, they also provided services to approximately 725 adults. Information from SDE indicates that this program serves approximately 1.4 percent of California's 200,000 Indians, or 6.6 percent of the estimated 32,400 K-12 Indian students. Table 1 indicates that the centers serve from a low of 3.4 percent of a county's K-12 Indian population (Los Angeles) to a high of 120 percent of the county's K-12 Indian population (Inyo). On average, the centers serve approximately 13 percent of the participating county's K-12 Indian population.

Appropriateness of State Administration. The department's report contains no information on the amount of funding provided by the state for overall administration of the program. We have

subsequently been advised by the department, however, that the state spends \$111,000 annually for this purpose, which is about 12 percent of the total amount provided directly to the centers.

Current law requires the State Board of Education to adopt guidelines for the selection and administration of the education centers. The board adopted such guidelines in 1977, and most recently updated them in 1982. Our review of the guidelines, however, indicates that although they are comprehensive, they no longer serve as a functional guide by which the program is operated. There are numerous directives in the guidelines that are not used for current program administration. Examples of this include:

- **Annual Evaluation.** The guidelines specify that the Office of Program Evaluation and Research within the SDE will conduct a yearly evaluation of the programs. To our knowledge, such an evaluation has not been conducted since 1980.

- **Department Site Visits.** The guidelines also state that each center will be visited four times per year, once in each fiscal quarter. According to SDE, the current practice is to visit each center twice a year, although in 1986-87 only five of the centers were visited twice—the remaining seven were visited only once.

Appropriateness of Local Administration. On the local level, the SDE report indicates that approximately 73 percent of the state funds provided to the centers is spent for salaries and benefits, with 27 percent spent on operating expenses and equipment (books, supplies etc.). Our own review of the centers most recent applications indicates that there is a wide variety and disparity in the size and configuration of staffs, and the salaries and benefit levels for the employees of the different centers. In no instance, however, did our review identify a full-time equivalent employee earning more than \$19,000 per year.

Allocation of Funds. Current law does not specify how available funds are to be allocated to eligible applicants—this determination is left to SDE in accordance with the written guidelines required to be adopted by the State Board of Education. As a practical matter, SDE allocates funds for this program on a per-project basis, based on a center's historical level of allocation, rather than on the basis of the number of clients served, the type of service provided, the individual comparative merits of the program and/or the relative needs of the area. As a result, there

is a great deal of variety in the cost and type of services for which the state provides funding support. For example, one center provides after-school tutoring, cultural and recreational activities to an estimated 500 preschool and K-12 students while, for the same level of funding support, another center provides four hours per day of learning readiness activities to approximately 20 preschoolers.

On a more detailed level, in 1987-88, the state provided funding support to individual centers ranging from a low of \$47,496 to a high of \$99,196, with the median center allocation being \$68,000. On a per-client basis, state funds purchased services from a low of \$161 per-client served to a high of \$1,092 per-client served.

The department's funding allocation system favors the renewal of currently-funded centers to the exclusion of new projects. Even when a currently-funded project terminates program participation, the department's practice is to solicit applications only from organizations that will provide service to the same geographical area. Under this system, regions that do not now receive services have little chance of doing so in the future.

A review of each county's K-12 Indian population statistics indicates that several counties, either on a percentage or numerical basis, have Indian populations in excess of several of the counties that currently have centers. Table 2 identifies these counties. It shows, for example, that in Alpine County 43 percent of the K-12 population is Indian.

Table 2
Unserved Counties With Sizable K-12 Indian Populations
1986-87

County	K-12 Population ^a		K-12 Indians as a Percent of Countywide K-12 Population
	Countywide	Indian	
Alpine	146	62	42.5%
Del Norte	3,687	483	13.1
Modoc	1,938	93	4.8
Mono	1,291	102	7.9
Siskiyou	8,128	382	4.7
Yuba	10,911	491	4.5

^a Source: SDE 1986-87 Racial/Ethnic Distribution of Staff & Students in California Public Schools.

Coordination With Other Programs. The California Indian Education Centers program is administered by SDE's American Indian Education Office. The bureau administers one other state-funded Indian education program (Native American Indian Early Childhood Education program) and provides liaison services with three federally-funded Indian education programs ("Title IV", Johnson-O'Malley and Career Education Centers). The department's report indicates that none of the state-funded Native American Indian Early Childhood Education programs operates in an area which also is served by an Indian Education center.

Our review of the federally-funded Indian education programs indicates that these programs provide some overlapping services to the same client population, but we were unable to determine if this overlap results in a duplication

of services. The SDE report does not indicate whether duplication of effort exists among these programs.

Table 3 (following page) provides comparative information on state and federal Indian education programs.

In addition to the programs identified in Table 3, there are several other state and federal categorical aid programs that are designed to improve educational accomplishments, particularly in reading and mathematics. These include the School Improvement Program (SIP), Economic Impact Aid, federal Chapter 1 and federal Title IV. Although K-12 students receiving services from the Indian Education centers may also be eligible for or concurrently receiving services from these other programs, the SDE report does not comment on the extent to which this occurs or whether it is desirable.

Program Effectiveness

Appropriateness of Program Goals. Current statutory law specifies two broad goals for the California Indian Education Centers program. These are:

1. "To strengthen the instructional program within the public schools by establishing Indian education centers;" and
2. To have the established education centers "serve as educational resource centers in Indian communities to the Indian students, parents, and the public schools."

In addition, the law identifies another 12 specific objectives (detailed on page 5 of this report) that the centers shall be designed to accomplish.

The written guidelines adopted by the State Board of Education in 1982 specify that all centers, while striving to meet the statutory goals detailed above must, in addition, meet 4 of the 12 specific

objectives. Two of these objectives must include: (1) "[Improving] the academic achievement of Indian students with particular emphasis on reading and mathematics;" and (2) "[Improving] self-concept of Indian students and adults."

Our review indicates that the two primary statutory goals of this program, although laudable, are too broad to provide either effective guidance to centers offering services or to be used as meaningful criteria against which objective accomplishment can be measured. Moreover, SDE's implementation guidelines do little to address this problem. In addition, the 12 secondary statutory objectives are so diverse that any number of different types of programs could be developed that would meet one or more of these goals.

Table 3
Comparison—State and Federal Indian Education Programs
1986-87

PROGRAM	AUTHORITY/ESTABLISHED	CLIENT POPULATION	PROGRAM OBJECTIVE	NUMBER SERVED	ANNUAL FUNDING	COST PER CLIENT SERVICED	ELIGIBLE APPLICANTS (REMARKS)
Indian Education Centers "SB 2264"	State/1974	Indians of all ages	"Improve academic achievement and self-concept of Indian students"	3,000	\$861,000	\$213	Any tribal group or incorporated Indian association ^a
Native American Indian Early Childhood Education Program "AB 1544"	State/1972 (reauthorized 1974 and 1977)	Rural Indians (Pre-K through grade 4)	"Improve educational accomplishments"	1,130	361,000	306	Rural school districts with a school having a minimum of 10 percent Indian students
"Title IV" (Indian Education Act of 1972)	Federal/1972	K-12 students (must be state- recognized Native American)	"To meet special educational and cultural-related academic needs of Indian children"	26,902	3,239,63	120	Local education agencies (LEAs) ^b
Johnson-O'Malley	Federal/1934	K-12 students (must be documented 1/4 blood Indian)	Supplemental education and educationally- related services	2,473	234,935	95	Public schools or specified Indian agencies ^c
Career Education Centers	Federal/1934	Indians (age 16 and older)	Gain skills to pass high school proficiency exam and enhance job development	1,407	230,000	163	Funds six centers at pre-existing adult education sites

^a Twelve centers provide community activities, counseling, health and library services, recreation and sports; no center operates in a site served by AB 1544.

^b Fully federally-funded—no state administration role; liaison activities only; 10 of the 11 AB 1544 districts receive these funds.

^c Fully federally-funded—no state administration role; liaison activities only.

Summary

Our review of the California Indian Education Centers program identifies the following problems:

- The statutory goals and objectives are too broad to provide effective guidance in selecting the types of service to be provided and lack yardsticks for measuring the program's effectiveness.
- The guidelines adopted by the State Board of Education for the selection and administration of the education centers are outdated and no longer direct or reflect the current operational practices of the program.
- Current funding allocation practices (1) do not allow for new—and possibly improved—projects to be funded, and (2) effectively preclude from funding consideration geographical areas which are not currently served by the program.

These problems relate primarily to the current implementation of the program, and do not necessarily reflect a lack of effectiveness or need for the program. For these reasons, therefore, we do not believe that this program should necessarily be eliminated. Instead, we recommend that a comprehensive evaluation be undertaken as a basis for the Legislature to determine the appropriate level of any future funding and

the need or desirability to revise the scope and purpose of the program. At a *minimum*, such an evaluation should focus on (1) the effectiveness of the program as a whole in increasing the academic achievement of Indians, (2) the effectiveness of the individual projects funded, (3) the need to improve the academic achievement and self-concept of Indians through the use of independent Indian centers, (4) the need for more specific goals and objectives, either administrative or statutory, and (5) the educational needs of California Indians.

Based on a review of the findings of such an evaluation, the Legislature will be able to determine the need to adjust the statutory goals or requirements of the program, as well as the associated costs of making the adjustments. The current statutory deadline of June 30, 1989 may need to be extended by up to an additional two years in order to allow adequate time for such an evaluation to be completed and reviewed by the Legislature.

The Legislature has taken the initial step to implement this recommendation by adopting language in the *Supplemental Report of the 1988 Budget Act* which directs the SDE to prepare a specified evaluation plan by September 15, 1988.

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Chapter III

Chapter III

Comments on Recommendations of The State Department of Education

As noted in the introduction to this report, the sunset legislation specifies 11 items that the State Department of Education (SDE) report *may* address and 7 items that it *must* address in its Indian Education Centers Program Sunset Report. Of the 11 optional items, the department fully addresses only one—the purpose and intent of the program—and partially addresses two others (the SDE as the administering agency and the need for the program). Of the seven required items, the department fully answers only one, leaving the remaining six either partially or only superficially answered. As a result, the

department's report provides little analytical assistance to the Legislature in determining whether the program should be continued and, if so, how it may be improved.

The report makes four recommendations regarding this program. Although the report does not specifically address whether the program should be continued or "sunsetting," the thrust of the report implies that the program should be continued and changed, as indicated. The SDE's specific recommendations and our comments are as follows:

Cost-of-Living Adjustments

The SDE recommends that the program be provided with a statutory cost-of-living adjustment (COLA) sufficient to offset the effects of inflation. Although the department notes that the COLAs that have been provided to the program have not kept pace with the increase in

inflation, it does not indicate the degree to which the COLAs have fallen short, nor the cost to provide such adjustments. Table 4, however, identifies the program's funding increases during the past five years and compares them to the growth of inflation over the same time period.

Table 4
California Indian Education Centers Program
Comparison—COLAs and Inflation
1983-84 through 1987-88

Year	Funding Level	Change From Prior Year	
		COLA	Inflation ^a
1983-84	\$795,000	6.0%	4.58%
1984-85	819,000	3.0	4.94
1985-86	852,000	4.0	4.26
1986-87	861,000	1.0	3.66
1987-88	861,000	0.0	4.77
Cumulative Change from 1983-84 to 1987-88:		8.3%	18.80%

^a As measured by the GNP deflator for state and local government purchases.

Table 4 indicates that, over the past five years, the Indian Education Centers program funding level has increased by approximately 8.3 percent, while during the same period of time inflation (as measured by the GNP deflator for state and local government purchases) has increased by nearly 19 percent.

Legislative Analyst's Comments

We concur that reasonable COLAs should be provided to programs to prevent an indirect reduction in service level as a result of inflation. However, we recommend that any such COLA provided be discretionary, rather than statutory.

We have consistently recommended against the establishment of *statutory* COLAs, because they restrict the Legislature's flexibility to reorder priorities. For this reason, we recommend that the Legislature not establish a statutory

COLA for the California Indian Education Centers program.

If the Legislature chooses to provide a COLA for this program, we recommend that it use the one on which the statutory COLA for school district revenue limits is based, that is, the Implicit Price Deflator for State and Local Government Purchases of Goods and Services, published by the U.S. Department of Commerce.

Further, it is important to note that SDE is not obligated either to renew each project's funding from year-to-year (as is current practice) or to provide full funding for a project. Consequently, to the extent that state-provided funding does not keep pace with inflation, SDE can (1) fund fewer centers, thereby providing a larger allocation to those that remain in the program, or (2) rely on the participating centers to provide some local funding support.

Program Evaluation

The department recommends that funds be provided to develop and implement a comprehensive evaluation model for gathering data and information to measure the effectiveness of each

of the center's programs. The department's report does not specify what level of funding support would be required to conduct such an evaluation.

Legislative Analyst's Comments

We concur with this recommendation. Specifically, we recommend that SDE develop a detailed plan, including a funding proposal and timeline, to conduct a comprehensive evaluation of the program. The evaluation should focus on (1) the effectiveness of the centers in improving the academic achievement of Indian students, and (2) the need to maintain independent centers to augment the educational programs offered by the public schools. The Supplemental Report of the 1988 Budget Act (1988-89 fiscal year), contains language directing the SDE to submit such an evaluation plan to the Legislature and Department of Finance by September 15, 1988.

Because there is currently no ongoing evaluation process, the value of the overall program or of any of the individual center projects cannot be assessed at this time. We find that the department's sunset review report inadequately addresses the following major issues:

Program Restructuring

The department recommends that the program design at each center be restructured so that comprehensive educational services (such as literacy training, vocational training, and substance abuse prevention) for the entire Indian family are provided, based on an identified assessment.

Legislative Analyst's Comments

We believe this recommendation is premature. Absent data indicating the types and relative effectiveness of the services currently provided

- The effectiveness of the Indian Education Centers program as a whole in improving the academic achievement of Indian students.
- The effectiveness of the individual Indian Education center projects.
- The rationale for allocating funds based on prior-year funding levels, rather than providing funds based on relative need or program effectiveness.
- The extent to which participants in this program receive duplicate or similar services from other Native American Indian or compensatory education programs.

Our review indicates that it is both possible—and necessary—to address these issues, in order to assist the Legislature in its deliberations regarding continuation and improvement of the program.

by the centers, there is no analytical basis to support restructuring the program at this time. Further, our review indicates that SDE already has both the statutory authority and responsibility to administer this program in a manner that best meets the established intent and purpose of the program. In short, SDE has the authority to restructure the program as it sees fit provided the program structure remains consistent with the rather broad parameters prescribed by current law.

Statewide Assessment

The department recommends that the educational needs of the American Indian population be assessed on a statewide basis so that additional centers can be established in areas of greatest need, pending receipt of high quality proposals and program plans for those areas.

Legislative Analyst's Comments

We also believe this recommendation is premature. Again, absent data identifying the types and relative effectiveness of the services currently provided under the California Indian Education Centers program, there is no analytical basis to support expansion of this program. We do concur, however, with the portion of the recom-

mendation that calls for a statewide assessment to be conducted of the educational needs of California Indians. In our view, such an assessment could be used by the department to establish a purpose and set of goals for the program that are more specific than those specified in statute. Once conducted, however, the results of such an assessment should be used by the department to determine the future funding levels for *all* centers, not just additional centers. The assessment could be incorporated into a larger evaluation of the program. We can find no analytical justification for continuing the funding of centers if they fail to meet the needs identified by such an assessment. ♦