PROGRAM EVALUATION

OPERATIONAL REVIEW
EDUCATION PROGRAM
(SASKATCHEWAN)

Prepared by
Audit Services Bureau
March 1980



Indian and Northern Affairs
Indian and Inuit Affairs Program
Program Evaluation Branch



LIBRARY

DEPT. OF INDIAN AFFAIRS

AND EXPLORMENT

DEC 23 1980

MINISTERE DES ALLA RES INDIENNES Et du nord Canadien Bibliotnèque

OPERATIONAL REVIEW
EDUCATION PROGRAM
(SASKATCHEWAN)

Prepared by
Audit Services Bureau
March 1980

This report was prepared by the author under contract and all opinions expressed in this report are those of the author.

It is not an official Departmental publication and the opinions/recommendations do not necessarily reflect the views of the Program Evaluation Branch of the Department of Indian and Northern Affairs. This report does not constitute an expression of Departmental policy.

EXECUTIVE SUMMARY

TABLE OF CONTENTS

	PAGE
EXECUTIVE SUMMARY	(i)-(xi)
INTRODUCTION	1
METHODOLOGY	2
ACKNOWLEDGEMENT	7
OBSERVATIONS & RECOMMENDATIONS	
Indian Control	8
Quality of Education	21
Management	31
Resource Utilization/Protection	38
Accountability	50
EXHIBITS	Follows Page
I Control Model	9
- Present	13
III - Proposed	13
IV Accountability Levels	52

EXECUTIVE SUMMARY

The Concept

The concept against which this study was carried out, and within which the content of this report was developed, must be stated and recognized by all concerned if there is to be any meaning and value to the total project. It is a concept which was not preconceived by the authors of the study, but rather was delineated through discussions with executives and managers of the Department and with executives of Indian organizations; through meetings and interviews with Indian Band chiefs, council members and school committee people; through examination of other reports, policy statements (from the Minister and from Indian organizations) and relevant statutes; and from reviews of selected studies of the social environment.

It starts with a commitment:

- to the fact of the Crown's responsibility (obligation) to provide for the education of the Indian people
- to the fact of Indian Control of Indian Education.

It continues with dedication to:

- the fundamental concept that quality of education is of primary concern, and that such quality must be defined and measured in terms of the self-determined needs of the Indian people.

It includes an approach designed to achieve:

- quality of education
- effective use of resources
- protection of resources
- valid and useful management information

with each of these being done with the clear intent of providing support to the Indian people in a manner that will facilitate and strengthen their control and management of their education program.

EXECUTIVE SUMMARY

Observations

Observations (and proposed courses of action) contained in this report are made in the context of the stated commitment, dedication and approach. They deal first with the commitment, because without such a commitment all else is meaningless.

The major statement which this report carries is that there is no evidence of a clear commitment on the part of the Government of Canada as to their obligations towards the education of the Indian people, and a consequent lack of well-defined and agreed-upon jurisdictions and responsibilities. These are the root causes of problems encountered in the Education activity.

Because of the lack of commitment, there has been no satisfactory solution to the question of acceptable formulas and procedures for transferring funds to the Indians with which they can acquire education services. Indeed such a solution is not likely to be identified in present circumstances, where control of Education is not defined (by the Department) in terms of the management decision process, but rather in terms of administrative and financial procedures.

Because of the overwhelming preoccupation with administrative procedures and financial (accounting) controls, the primary concern-quality of education- has been almost completely ignored. Performance criteria have not been set; appropriate information has not been collected to compare actual with desired results; and little action has been taken to perceive and address the environmental conditions within which the Indian child is buffeted. In the case of Indian children off the Reserve, there is no clear recognition of any responsibility for their education.

Finally, within the structure that does exist, serious weaknesses in management must be reported. Educators whose original responsibilities and expectations were (and should be) aimed at the provision of good education to Indian children, are seriously hampered and greatly frustrated by: reduced budgets; arbitrary decisions (from senior levels) as to distribution and use of available resources; inadequate resources, or improper use of resources; and a financial control and reporting system which does not serve well their management needs but does impose time demands on them which they can ill afford.

EXECUTIVE SUMMARY

Observations (Cont'd)

It is not surprising, in view of the foregoing, that there has been little positive action to develop those components of organization and management which are essential to Indian control. Little effective assistance has been offered to Indian Chiefs or council members through which management skills might be developed; and little action has been taken to help them define and develop the many components of an Education infrastructure which they may consider essential to the effective operation of their own school system. As a result, the assumption of control or management of schools by Bands is not generally perceived as being successful, or necessarily desirable. In fact, the Band Council is required to operate as an extension of the bureaucracy by the terms and conditions of its "arrangement" with the Department.

One overriding problem appears to be that accountability for Indian Education has remained an outstanding, unresolved question. Accountability is not clearly defined in the Department, largely because of organizational relationships which permit accountability to be progressively side-stepped and transferred upward until it reaches Parliament, or successfully avoided because disciplinary measures are difficult to apply. General policies may be clearly stated by senior management, but subordinates cannot be held accountable when instructions are not clear or the same senior levels of management impose constraints which effectively inhibit such policies.

It is necessary that those who demand accountability from others recognize their own responsibility to provide clear instructions (criteria, standards, objectives, etc.) against which that accountability can be assessed.

There is another contributing factor to any reluctance which the Bands may have shown in regard to taking over control of education. While they may feel they are prepared to meet "accountability requirements" in respect to their community needs and to the financial resources provided by the Government of Canada, they are not sure that present levels of funding are adequate to do the job properly. There is a strong opinion that if "agreed formulas" were to be based on those present levels, the money so provided would not properly meet those short term needs which are high because the Education program is essentially in a developmental phase.

EXECUTIVE SUMMARY

Proposed Courses of Action

The acceptance of the concept set forth in the first page of this summary must of course be the first essential recommendation. But it is also a prerequisite, since all the succeeding recommended courses of action are set in that context.

The major recommendations presented in this report may be summarized as follows:

- that moneys for education be allocated initially to the 68 Bands who will ultimately be responsible for further resource allocation
- that individual Indian Bands be permitted full control, in management terms, of their education activity, including: setting objectives; evaluating results in their terms; and deciding on appropriate corrective action
- that corrective action be taken by the Department to establish effective management control procedures; such procedures to serve the immediate needs of the Indians and the Department, but also to be readily transferable to Bands on an as-required basis.

The first and second recommendations may seem to be interdependent, but much of the second can be effected regardless of which process is followed to allocate funds. The preferred approach, of course, is to treat all recommendations as one total, integrated package without, however, delaying immediate action on some items simply because others are delayed or difficult to do.

Separate detailed recommendations are included in the body of the report with each of the observations. They are presented here in summary in order to provide an appreciation of their direction and their relevance.

Supporting observations and data will be found in the body of the report as indicated by the page reference.

EXECUTIVE SUMMARY

Indian Control

- the control of education by Indian Bands be identified in terms of the management process, rather than in terms of administrative duties (p. 9)
- agreements with Bands to control their own schools (Education program) be cast in terms which recognize the right of the Band to make their own decisions (p. 10)
- dollar resources be allocated to Indian Bands for educational purposes on the basis of an agreed commitment on the part of the Government of Canada to provide such resources (p. 12)
- the funds so calculated be transferred in total to the 68 Indian Bands as the first step in the allocation process (p. 12)
- services provided at District and Regional office levels be determined in terms of Band requests, and that necessary funds be transferred from original Band allotments on the concurrence of the respective Chiefs (p. 12)
- all moneys transferred to Bands for any education purpose be included in only one Vote Control Code, to facilitate the allocation of such moneys in accordance with Band decisions (p. 12)
- an officer at senior level be appointed, with specific responsibility and suitable authority for facilitating the transfer or control of education to the Band Chiefs and Councils (p. 14)
- all job descriptions for Education staff be modified to indicate clearly the responsibility towards achieving the fact of Indian control (p. 14)
- the Department focus and intensify its efforts on providing resources to Bands so that they may acquire management training for Band personnel; and that a supportive role be adopted by District personnel to assist Bands who elect to take on management responsibilities (p. 15)

EXECUTIVE SUMMARY

Indian Control (cont'd)

- the Department provide assistance to the Bands or their representatives, and to the District Chiefs groups, in the matter of identifying and developing an educational infrastructure to support their schools and educational programs (p. 16)
- three-party agreements be revised and renegotiated to include options to be exercised by the Band in the event that unsatisfactory results are being achieved (p. 19).

Quality of Education

- the environmental difficulties facing the Indian student be recognized and addressed (p. 22)
- education programs coming under control of Bands be given proper resources and time to accomplish their stated goals (p. 22)
- information such as retention rates, age-grade retardation levels, absenteeism, be collected regularly, analysed for cause/effect relationships, and made available to Bands and Districts as a guide to remedial action (p. 24)
- District Education staff maintain a regular and frequent dialogue with Indian people (particularly parents), as a formal means of collecting information regarding the quality of education being received by their children (p. 24)
- the information flow (and the analytical process) so developed be done in a manner which will permit their easy transfer to Bands as requested (p. 24)
- Headquarters policies and the budgeting process be examined to permit and facilitate realistic co-ordination between Social Services and Education (p. 26).

EXECUTIVE SUMMARY

Quality of Education (Cont'd)

- all tuition agreements be called up for review; and that each Band affected make arrangements for new agreements setting forth standards of performance and including authority for the Band to ensure such standards are met (p. 27)
- a comprehensive orientation course be established for all new teachers and during this course a screening process be actively pursued (p. 30)

Management

- insofar as the Director of Education occupies a staff position, and the Director of Operations exercises control over program operations through the DO/DM/DSE route, this reporting/accountability relationship be clearly communicated to the Bands to assist them in dealing with operational and information needs (p. 31)
- action be taken by Director of Operations and District Managers to ensure that District Superintendents of Education and their staffs devote all or most of their time to those duties which relate to educational components of the program; and that the Director of Education be given the authority to monitor the use of the resources on an on-going basis (p. 31)
- the Regional Office develop and implement newly-defined roles for Education staffs, consistent with the concept of Indian control (p. 33)
- the Department's stated aims be translated into organizational plans and operating policies; and that these latter be communicated to all concerned (p. 33)
- the Department clarify its position on residency as a factor affecting education and that any arrangements with Provincial Governments have the agreement of the Indian people concerned (p. 34)

EXECUTIVE SUMMARY

Management (Cont'd)

- the responsibility for obtaining school bus services rest with Economic Development Branch, with clear contractual responsibility to meet the requirements identified by Education Branch (p. 36)
- pre-tendering conferences be held with prospective contractors to ensure that they are in a position to submit viable tenders (p. 36)
- tenders be reviewed and only those judged to be economically viable, considering total community needs, be considered (p. 36)
- the role and authorities of DSEs be clearly defined in line with the departmental thrust of Indian Control of Indian Education (p. 37)
- the DSEs and staff be relieved of the many administrative duties that impede their efforts to act as educators and to promote an effective educational program in the Province (p. 37)

Resource Utilization/Protection

- cost data be accumulated in a manner which will permit Band Chiefs and Councils, as well as Department management personnel, to determine the relative costs of the several systems, and to set practical targets for optimum cost performance (p. 38)
- staff requirements for the Education program at Region and District be adjusted to be more in line with the apparent importance of the program (p. 40)
- a review of the administrative work presently being done by District Education Personnel be conducted to ensure that this work is necessary, that it is the responsibility of Education personnel, and that it cannot be done with less expensive resources (p. 41)

EXECUTIVE SUMMARY

Resource Utilization/Protection (Cont'd)

- all job descriptions in the Education activity both at Region and at Districts, be reviewed to ensure they are consistent with program objectives, that they define specific roles without undue duplication, and that they exclude all activities which are not related to the Education program (p. 42)
- at those districts where engineering personnel are located, school maintenance duties be assigned to them immediately, with accountability to the Education program clearly defined (p. 44)
- action be taken to provide engineering expertise at the District Office where it is lacking (p. 44)
- action be taken at the Regional level with support from HO if necessary, to ensure:
 - that for each capital project (Education program), precise specifications be drawn up and more accurate estimates be made in the first instance
 - that DIAND (E&A) be held accountable to the appropriate Education authority as overall project manager, including the management functions normally carried out by a prime contractor
 - that all excess costs over and above comparable Provincial projects and over and above original estimates be investigated for cause
 - that contractors (including PWC if used) be held responsible for delivering at estimated costs, buildings which fully meet the specification, or paying for necessary repairs and modifications
 - that all sub-contracts include penalty clauses to compensate for failure to deliver on agreed time as per specifications (p. 45)

EXECUTIVE SUMMARY

Resource Utilization/Protection (Cont'd)

- the management of capital projects be handed over to Bands as soon as possible, thus eliminating some of the potentially costly steps in the present process (p. 45)
- the Residence be recognized as a necessary facility to provide education opportunities to Indian children who otherwise would be excluded (p. 48)
- the Residences in each District be put under the control of the District Chiefs, who would establish entrance requirements and priorities (p. 48)

Accountability

It is recommended that:

- all accountability relationships be clearly established, and the nature of sanctions be identified; for example:
 - DIAND to the Indian Bands and to Indian Band Governments
 - Indian Band Governments to DIAND
 - Indian Band Governments to their communities
 - DIAND to the Government of Canada
 - Provincial schools to the Indian Bands

all of these being in the context of Indian Control of Indian Education; and that this information be passed to all concerned, both internal and external to the Department (p. 50).

There are two important caveats to be considered:

- that the legal framework, within which the Department maintains its relationship with the Indians, must be restructured through current revisions of the Indian Act to set out the respective jurisdictions of the Government and the Indians, and to give clear direction to the Department of Indian Affairs as to the Crown's commitments to Indian people.

EXECUTIVE SUMMARY

Accountability (Cont'd)

- that the environment within which the Indian child exists and is educated must be recognized for its negative impact on any education program, whoever controls it; and that wholly integrated programs should be designed to attack the negative environmental factors (socio-economic conditions) which now exist.

It is emphasized, however, that these caveats need not, indeed must not, be allowed to become prerequisites, and therefore roadblocks, to the courses of action set forth in this report. Good faith on the part of the Department can be demonstrated by taking immediate action in all these areas; none of the proposed actions are inconsistent with or in conflict with policies and procedures that are already in place or can easily be implemented.

Conclusion

Discussions with responsible people in the Department revealed an underlying concern that the Indian people may not yet be able to manage their Education program; and that therefore great care must be taken to ensure that they (the Bands) are fully qualified (e.g., able to evaluate results) before control is handed over.

This is somewhat presumptuous, because the Department has not demonstrated any particular success in managing the Education program, i.e., producing satisfactory results on behalf of the Indians.

Agreements have been set out to permit the Department to "withdraw" control if the Bands do not "perform"; this is in recognition perhaps of the over-riding trust relationship between Canada and the Indian people with respect to providing education to the Indian people. The agreements, however, because of this overriding stipulation, tend to engender a response from Band Chiefs and Councils in which they avoid any unilateral action which may result in perceived failure.

If the Indians are to be successful in managing their Education program, they must be allowed to make their own mistakes and be responsible to their own people for the consequences.

EXAMEN OPÉRATIONNEL PROGRAMME D'ÉDUCATION (SASKATCHEWAN)

RÉSUMÉ A L'INTENTION DE LA DIRECTION

Le concept

Le concept à la base de la présente étude, et dans le cadre duquel le contenu du présent rapport a été élaboré, doit être énoncé et reconnu par toutes les personnes concernées pour que le projet dans son ensemble ait une valeur et une signification quelconques. Ce concept n'a pas été préétabli par les auteurs de l'étude, mais a plutôt été délimité à la suite de discussions avec les cadres et les gestionnaires du Ministère et les cadres des organisations indiennes; de rencontres et d'entrevenues avec les chefs de bandes indiennes, les membres de conseil et de comité scolaires; de l'examen d'autres rapports, de déclarations de principe (du Ministre et des organisations indiennes) et des lois appropriées; enfin, à la suite d'examens d'études choisies traitant de l'environnement social.

Suivant ce concept, on reconnaît d'abord:

- le fait que la Couronne a la responsabilité (l'obligation d'assurer l'éducation des Indiens
- le principe des Indiens maîtres de leur éducation.

On souscrit ensuite à:

 la notion fondamentale selon laquelle la qualité de l'enseignement est d'importance primordiale et doit être définit et évaluée d'après les besoins exprimés par les Indiens.

On utilise enfin une approche destinée à assurer:

- la qualité de l'enseignement
- l'utilisation efficace des ressources
- la protection des ressources
- la gestion efficace et judicieuse de l'information

en répondant à chacun de ces besoins dans l'intention claire d'appuyer les Indiens de façon à leur permettre de mieux maîtriser et gérer leur programme d'éducation.

Observations

Les observations (et les marches à suivre proposées) contenues dans le présent rapport s'insèrent dans le contexte des trois grands aspects du concept, énoncés plus haut. Elles traitent d'abord du premier aspect, soit la reconnaissance de deux faits, parce que sans cette reconnaissance tout le reste ne rime à rien.

Selon le principal énoncé contenu dans le présent rapport, il n'existe aucune indication d'un engagement clair de la part du gouvernement canadien quant à ses obligations concernant l'éducation des Indiens; par conséquent, les compétences et les responsabilités sont mal définies et ne sont pas acceptées d'un commun accord. Ces dernières lacunes sont à la base des problèmes auxquels le programme d'éducation se heurte.

Etant donné cette absence d'engagement, aucune solution satisfaisante n'a pu être apportée à la question des méthodes acceptables de transfert des fonds aux Indiens pour leur permettre d'obtenir des services éducationnels. En effet, il ne sera peut-être pas possible de trouver une solution dans les circonstances actuelles, puisque le contrôle de l'éducation n'est pas défini (par le Ministère) en termes de processus décisionnel sur la gestion, mais plutôt en termes de procédures administratives et financières.

Etant donné la priorité absolue accordée aux procédures administratives et aux contrôles financiers (comptables), on a presque complètement laissé de côté le principal sujet de préoccupation: la qualité de l'enseignement. On n'a pas établi de critères de rendement, ni recueilli les renseignements appropriés pour comparer les résultats obtenus aux résultats souhaités; enfin, on ne s'est guère efforcé de déterminer et d'examiner les problèmes d'adaptation au milieu auxquels le jeune Indien doit faire face. En ce qui concerne les jeunes Indiens fréquentant des écoles situées hors des réserves, on ne reconnaît explicitement aucune responsabilité quant à leur éducation.

Enfin, il faut signaler les grandes faiblesses de gestion actuelle de l'organisation. Les éducateurs, dont les responsabilités et les attentes, à l'origine, visaient (et devraient viser) à fournir une éducation valables aux jeunes Indiens, voient leurs efforts sérieusement contrecarrés par: la réduction des budgets; les décisions arbitraires prises aux échelons supérieurs en ce qui concerne la répartition et l'utilisation des ressources disponibles; l'attribution de ressources insuffisantes ou la mauvaise utilisation des ressources; enfin, un système de contrôle et d'établissement de rapports financiers qui répond mal à leurs besoins de gestion et qui leur impose des délais qu'ils ne peuvent guère se permettre.

Il ne faut pas s'étonner, à la lumière de la situation décrite plus haut, que peu de mesures concrètes aient été prises pour élaborer les éléments d'organisations et de gestion essentiels pour rendre les Indiens maîtres de leur éducations.

Les chefs indiens et les membres des conseils n'ont reçu qu'une aide médiocre pour perfectionner leurs aptitudes de gestion, et on ne s'est guère efforcé de les aider à définir et à établir les nombreux éléments d'une infrastructure éducationnelle qu'ils peuvent considérer essentiels au fonctionnement efficace de leur propre système scolaire. Par conséquent, la prise en main de la direction et de l'administration des écoles par les bandes n'est généralement pas considérée viable ou nécessairement souhaitable. En fait, on demande au conseil de bande d'agir comme une extension de la bureaucratie, aux termes de l'"arrangement" qu'il a conclu avec le Ministère.

La responsabilité quant à l'éducation des Indiens constitue une question primordiale qui demeure sans solution. La responsabilité n'est pas clairement définie au sein du Ministère, en grande partie à cause de la hiérarchie, qui permet d'écarter progressivement la question et de la renvoyer aux échelons supérieurs, jusqu'à ce qu'elle atteigne le Parlement, ou de l'éviter complètement parce que les mesures disciplinaires sont difficiles à appliquer. La haute direction peut énoncer clairement des lignes de conduite générales; cependant, elle ne peut tenir les subalterne responsables à cause du manque de clarté des instructions ou des difficultés d'application des lignes de conduite dues aux contraintes qu'elle a elle-même imposées.

Les personnes qui exigent la responsabilité d'autrui doivent reconnaître qu'il leur appartient de fournir des instructions claires (critères, normes, objectifs, etc.) sur lesquelles il serait possible de fonder l'évaluation de cette responsabilité. Un autre facteur explique pourquoi les bandes peuvent se montrer réticentes à prendre en main leur éducation. Bien qu'elles puissent se considérer aptes à répondre aux "exigences de la responsabilité" à l'égard des besoins de leur communauté et des ressources financières fournies par le gouvernement fédéral, elles doutent que les niveaux de financement actuels suffisent à la bonne marche du programme. Selon l'opinion qui prévaut, si les "méthodes acceptées" devaient être fondées sur ces niveaux actuels, les fonds ainsi accordés ne pourraient répondre de façon appropriée aux besoins à court terme; ces besoins sont importants parce que le programme d'éducation n'en est, à toute fin, qu'aux premières étapes de son développement.

Prise en main par les Indiens

On recommande:

- que la maîtrise de l'éducation par les bandes indiennes soit déterminée en termes de processus de gestion, plutôt qu'en termes de fonctions administratives.
- que les ententes en vertu desquelles les bandes gèrent leurs propres écoles (programme d'éducation) soient formulées de façon à reconnaître le droit de la bande à prendre ses propres décisions...
- que les ressources financières réservées à l'éducation soient accordées aux bandes indiennes selon un engagement convenu de la part du Gouvernement du Canada à fournir de telles ressources.
- que la totalité des fonds ainsi déterminés soit transférée aux 68 bandes indiennes à titre de première étape du processus d'affectation.
- que les services fournis au niveau des bureaux régionaux et de district soient déterminés d'après les demandes formulées par les bandes et que les fonds nécessaires soient tirés des sommes affectées initialement aux bandes, avec l'accord des chefs respectifs.
- que toutes les sommes transférées aux bandes aux fins d'éducation soient inscrites sous un seul code de contrôle des crédits, de façon à faciliter l'affectation de ces sommes conformément aux décisions prises par les bandes.
- qu'un agent soit nommé à l'échelon supérieur et doté des responsabilités et des pouvoirs appropriés pour faciliter la remise de l'administration de l'éducation aux chefs et aux conseils de bandes.
- que toutes les descriptions de poste du personnel de l'éducation soient modifiées pour indiquer clairement la responsabilité de la remise aux Indiens de la maîtrise de leur éducation.
- que le Ministère concentre davantage ses efforts pour fournir des ressources aux bandes leur permettant d'assurer la formation de leur personnel dans le domaine de la gestion, et que le personnel de district prête son assistance aux bandes qui choisissent d'assumer des responsabilités administratives.

Prise en main par les Indiens (suite)

- que le Ministère aide les bandes ou leurs représentants, et les groupes des chefs de district, à déterminer et à établir une infrastructure éducationnelle pour soutenir leurs écoles et leurs programmes d'études.
- que les ententes tripartites soient révisées et renégociées pour mettre des options à la disposition des bandes, au cas où les résultats atteints se révèleraient insatisfaisants.

Qualité de l'enseignement

On recommande que:

- que les difficultés d'adaptation au milieu auxquelles l'étudiant indien fait face soient déterminées et examinées.
- que les programmes d'éducation relevant de la compétence des bandes reçoivent les resssources appropriées et soient répartis sur une période suffisamment longue pour que les objectifs visés soient atteints.
- que des renseignements, par exemple, les taux de persévérance, les niveaux de retard scolaire, l'absentéisme, soient recueillis régulièrement, analysés pour connaître les rapports de cause à effet, et transmis aux bandes et aux Districts pour leur permettre de prendre des mesures correctives.
- que le personnel de l'éducation du District entretienne un dialogue constant avec les Indiens (particulièrement les parents) afin de recueillir des renseignements sur la qualité de l'enseignement dispensé à leurs enfants.
- que la somme de renseignements (et le processus d'analyse) ainsi obtenue soit arrangée de façon à pouvoir être transmise rapidement aux bandes, sur demande.
- que les orientations et les méthodes de budgétisation du bureau central soient examinées pour permettre une coordination pratique entre les Services sociaux et l'Education.

Qualité de l'enseignement (suite)

- que toutes les ententes portant sur l'enseignement soient réexaminées, et que chaque bande en cause négocie de nouvelles ententes établissant des normes de rendement et autorisant la bande à s'assurer que ces normes sont respectées.
- qu'un cours d'orientation complet soit offert à tous les nouveaux enseignants et qu'un processus de sélection soit mis en œuvre à ce moment là.

Gestion

On recommande:

- dans la mesure où le directeur de l'Education occupe un poste fonctionnel et que le directeur des Opérations exerce un contrôle sur les opérations du programme par la filière directeur des Opérations/directeur de district/superviseur de l'éducation du district, que les différents paliers de responsabilité soient communiqués aux bandes pour les aider à traiter les besoins opérationnels et d'information.
- que des mesures soient prises par le directeur des Opérations et les directeurs de district pour s'assurer que les superviseurs de l'éducation des districts et leurs employés consacrent la totalité ou la majeure partie de leur temps aux fonctions liées aux éléments éducationnels du programme; et que le directeur de l'Education soit autorisé à vérifier régulièrement l'utilisation des ressources.
- que le bureau régional redéfinisse les fonctions du personnel de l'Education, conformément au concept de la prise en main par les Indiens de leur éducation.
- que les objectifs fixés par le Ministère se manifestent par des plans d'organisation et des lignes de conduite administratives; et que ces dernières soient communiquées à toutes les personnes intéressées.
- que le Ministère clarifie sa position concernant les séjours en résidence en tant que facteur influant sur l'éducation, et que tous les arrangements avec les gouvernements provinciaux soient conclus avec l'accord des Indiens en cause.

Gestion (suite)

- que la responsabilité d'assurer des services de transport scolaire soit assumée par la Direction générale du développement économique, avec l'obligation contractuelle de satisfaire les exigences déterminées par la direction de l'Éducation.
- que des conférences aient lieu avant le lancement des appels d'offres avec les entrepreneurs éventuels pour s'assurer qu'ils sont à même de présenter des offres valables.
- que les offres soient examinées et que seules celles jugées économiquement valables, eu égard à l'ensemble des besoins de la communauté, soient retenues.
- que le rôle et les autorisations des superviseurs de l'éducation des districts soient clairement définis, conformément à l'objectif du Ministère, qui est de rendre les Indiens maîtres de leur éducation.
- que les superviseurs de l'éducation des districts soient déchargés des nombreuses tâches administratives qui les empêchent de jouer pleinement leur rôle d'éducateurs et de promouvoir un programme d'éducation efficace dans la Province.

Utilisation et protection des ressources

On recommande:

- que les données sur les coûts soient rassemblées de façon à permettre aux chefs et aux conseils de bandes, de même qu'au personnel de gestion du Ministère, de déterminer les coûts relatifs de différents systèmes et d'établir des objectifs pratiques en vue d'un rendement économique optimal.
- que les besoins en personnel pour le programme d'éducation au niveau de la Région et du District soient ajustés pour être davantage conformes à l'importance manifeste du programme.
- qu'un examen du travail administratif accompli actuellement par le personnel de l'éducation du district soit effectué pour s'assurer que ce travail est nécessaire, qu'il relève du personnel de l'Éducation et qu'il ne peut être effectué de façon plus économique.

- que toutes les descriptions de poste au sein du programme de l'Éducation, tout niveau des Régions que des Districts, soient examinées pour s'assurer qu'elles sont conformes aux objectifs du programme, que les rôles y sont précisés sans se chevaucher indûment et que toutes les activités qui n'ont pas rapport au programme de l'Éducation y sont exclues.
- que dans les districts où des employés du Génie sont en poste, les fonctions d'entretien des écoles leur soient assignées immédiatement et que leur responsabilité envers le programme de l'Éducation soit clairement définie.
- que des mesures soient prises afin de fournir des services techniques aux bureaux de district où ils font défaut.
- que des mesures soient prises au niveau régional, avec l'assistance du bureau central si nécessaire, pour s'assurer:
 - que pour chaque projet d'immobilisations (programme de l'Éducation), des devis précis sont établis et des estimations plus exactes sont effectuées en premier lieu.
 - que le MAINC (Génie et Architecture) est responsable devant l'autorité appropriée de l'Éducation à titre de chargé de projet et qu'il s'acquitte des fonctions de gestion exécutées normalement par l'entrepreneur principal.
 - qu'on détermine la cause de tous les excédents de coût par rapport à des projets provinciaux comparables et par rapport aux estimations originales.
 - que les entrepreneurs (y compris Travaux Publics Canada, s'il y a lieu) sont tenus responsables de la remise, aux coûts prévus, de bâtiments tout à fait conformes aux devis ou du paiement de toutes les réparations ou modifications nécessaires.
 - que tous les sous-contrats contiennent des clauses d'indemnisation au cas où la remise n'a pas lieu à la date prévue selon les devis.

Utilisation et protection des ressources (suite)

- que la gestion des projets d'immobilisations soit laissée aux bandes dès que possible, ce qui permettra d'éliminer des étapes potentiellement coûteuses du processus actuel.
- que les résidences soient reconnues comme des installations nécessaires sans lesquelles de jeunes Indiens ne pourraient recevoir d'éducation.
- que les résidences dans chaque district soient assujetties au contrôle des chefs de district, qui établiront les exigences et les priorités en ce qui concerne l'admission.

Responsabilité

On recommande:

- que tous les paliers de responsabilité soient clairement définis et que la nature des sanctions soit déterminée; par exemple:
 - le MAINC est responsable devant les bandes indiennes et l'administration des bandes indiennes,
 - l'administration des bandes indiennes est responsable devant le MAINC,
 - l'administration des bandes indiennes est responsable devant la communauté,
 - le MAINC est responsable devant le Gouvernement du Canada,
 - les écoles provinciales sont responsables devant les bandes indiennes,

tous ces rapports de responsabilité s'inscrivant dans le contexte de la prise en main par les Indiens de leur éducation, et que ces renseignements soient communiqués à toutes les personnes concernées, qu'elles soient employées par le Ministère ou non.

Deux remarques importantes doivent être considérées:

- que le cadre juridique à l'intérieur duquel le Ministère entretient ses relations avec les Indiens doit être réorganisé à l'aide des modifications apportées actuellement de la Loi sur les Indiens afin d'établir les compétences respectives du gouvernement et des Indiens et d'imprimer une orientation précise au ministère des Affaires indiennes en ce qui a trait aux engagements de la Couronne à l'égard des Indiens. - que l'on reconnaisse l'effet négatif que le milieu dans lequel le jeune Indien évolu et reçoit son éducation exerce sur tout programme d'éducation, quelle que soit l'organisation qui l'administre et que des programmes complètement intégrés soient conçus pour tenter d'éliminer les aspects négatifs du milieu (conditions socio-économiques) qui existent actuellement.

Il faut souligner, cependant, que ces remarques ne doivent pas être tenues pour des conditions préalables et constituer, par conséquent des obstacles aux mesures exposées dans le présent rapport. Le Ministère peut prouver sa bonne foi en prenant des mesures immédiates dans tous les domaines mentionnés; aucune des mesures proposées n'entre en conflit avec les orientations et les procédures déjà établies ou faciles à appliquer.

Conclusion

A la suite d'entretiens avec des responsables au sein du Ministère, il apparaît qu'on entretient certains doutes quant à la capacité des Indiens de gérer dès maintenant leur programme d'éducation et qu'il faut donc s'assurer que les bandes sont tout à fait compétentes (par exemple, capables d'évaluer les résultats) pour prendre en main leur éducation.

Ces opinions sont quelque peu présomptueuses, puisque la gestion du programme de l'Éducation par le Ministère ne s'est pas révélée particulièrement réussie; autrement dit, elle n'a guère produit des résultats satisfaisants pour les Indiens.

Des ententes ont été conclues pour permettre au Ministère de "retirer" aux bandes la maîtrise de l'éducation si elles ne s'acquittent pas de cette tâche avec "succès"; cette précaution a peut-être été prise à la faveur de la confiance qui caractérise les relations entre le gouvernement canadien et les Indiens lorsqu'il est question d'assurer leur éducation. A cause de cette clause prépondérante, cependant, les chefs et les conseils de bande ont tendance à éviter toute action unilatérale qui risquerait d'être perçue au bout du compte comme un échec.

Si les Indiens doivent réussir à gérer efficacement leur programme d'éucation, ils doivent avoir le droit de faire des erreurs et en être responsable devant les membres de leurs communautés.

INTRODUCTION

This report presents the findings of an Operational Review of the Indian Education Activity in Saskatchewan Region carried out by Audit Services Bureau during the months of August, September and October 1979.

The need for such a review was identified by the Program Evaluation Branch (DIAND), who had commissioned a Background Paper for the review late in 1978. A Background Paper finalized in January 1979, suggested the Terms of Reference for this Operational Review, including: objectives, governing principles, review issues, work plan, team composition and working relationship, methodology, and time requirements.

This report deals with the issues identified in the Background Paper, of which the most important were seen to be Indian Control and Accountability. It also amplifies the question of Quality of Education, which was brought forward early in the study, as a major separate issue, by the Advisory Committee and the Study Team.

The Saskatchewan study is the first in a series of similar studies to be carried out in each of the Regions across Canada.

METHODOLOGY

Study Team

The Operational Review of the Education Program in Saskatchewan was carried out by Audit Services Bureau on contract with the Department of Indian Affairs and Northern Development, Program Evaluation Branch. The terms of the contract included an agreement that representatives of the Indian people and the Federation of Saskatchewan Indians (FSI) would be included in the study team. The team therefore was composed of:

Mr. Bill Hunter, Audit Services Bureau, Project Co-ordinator

Mr. Jack Curtin, Audit Services Bureau, Team Leader

Mr. Peter Legg, consultant

Miss Anne Noonan, consultant

Mr. Ken Goodwill, consultant

Advisory Committee

The terms of reference set forth in the Background Paper (January, 1979) stipulated that the study would be carried out under the direction of a Steering Committee. This stipulation was modified at the first meeting of that committee, when the name Advisory Committee was agreed as being more indicative of the role it could and would fulfill. At the same time, the make-up of the committee was set as follows:

Mr. Cliff Starr, Director, Federation of Saskatchewan Indians

Mr. Jim Freeman, Director of Education, Saskatchewan Region, DIAND

Mr. Bob Devrome, Consultant

Mr. Brian Pratt, Consultant

Dr. Walter Currie, Professor, Federated Indian College,

Mr. Henry Jansen, District Superintendent of Education, Meadow Lake District, DIAND

Mr. Bill Peigan Jr., Principal, Kaniswapet School, Muscow, Saskatchewan

Mrs. Alpha Lafond, Band Councillor, Muskeg Lake Band, Marcelin, Sask.

Dr. Rob Jones, Program Evaluation Branch, DIAND, Ottawa (Chairman - Project Leader)

METHODOLOGY

A total of seven meetings were held with the Advisory Committee, during which work plans and observations and recommendations relating to the Education Program were progressively submitted by the Study Team for the Committee's response and further guidance. It was agreed at the beginning of the Review that the report would not be considered as final until the Committee had reviewed and agreed to it; this in fact was done.

Band Visits

The major thrust of the Study was to visit as many Bands as feasible, in order to determine the actual situation respecting the Indian Education Program as it existed at the user level. To this end, the Study Team visited a total of 13 Bands as follows:

LaRonge Prince Albert District

Wahpeton

Muskeg Lake Saskatoon District

Mistawasis

 ${\tt John \; Smith}$

Moose Woods

Red Pheasant North Battleford District

Thunderchild

Payepot Touchwood/File Hills/Quappelle

Peepeekisis

Muscowekwan

Waterhen Lake Meadow Lake District

Loon Lake

Additional coverage in terms of contact with Band Chiefs and Council members was achieved, since at some of the meetings listed above, Chiefs and representatives from neighboring Bands attended and took part in the discussions. Also, in each of the six Districts, members of the Study Team attended meetings of the District Chiefs, to discuss the nature and scope of the study, before visiting the Bands.

METHODOLOGY

Schools and Residences

Further depth in the study was achieved by visiting a number of Indian Schools and Residences. They were:

Beauval

Meadow Lake District

Muscowekwan

Touchwood/File Hills/Qu'Appelle

Onion Lake

Saskatoon

Marieval

Yorkton

Lebret (Qu'Appelle)

Touchwood/File Hills

Duck Lake

Saskatoon

The decision as to which Bands (and Schools) to visit was based on two simple criteria:

- to visit Bands in all parts of the Region
- to visit some Bands in each category of: Band administered schools; DIAND administered schools on Reserves; Bands who send their children to Provincial schools.

Other than that, specific visits were generally in response to discussions held at District Chiefs' meetings, in which Team members outlined the nature and purpose of the study, and solicited voluntary participation.

Indian Organizations

The study included interviews and discussion with officers and members of the various Indian (FSI) organizations which have been established and developed in the past eight years to support and foster Indian education. They were:

The Federation of Saskatchewan Indians

The Indian Cultural College

The Indian Community College

The Federated Indian College

Relevant reports, documents, correspondence, etc., were obtained in most cases, and reviewed and studied as appropriate to the Study.

METHODOLOGY

Study Approach

The study was conducted in accordance with the operational audit methodology which was developed and has been used extensively by Audit Services Bureau during the past eight years. The important features of that methodology are:

- i) an examination of the management process which requires:
 - description and evaluation of environmental demands and influences as they relate to the assigned mission or mandate
 - definition of goals and objectives
 - allocation of resources to achieve those goals and objectives
 - the effective use of controls to ensure that goals and objectives are achieved
- ii) a search for and evaluation of management controls which are in place to ensure:
 - that products (outputs) are effective in terms of meeting user (environmental) requirements
 - that resource utilization is optimized
 - that resources are protected
 - that communications are understood and acted upon
 - that information (data) is accurate and representative
 - that operations are performed accurately and completely

with each control being examined and tested in terms of the control process defined in Exhibit I following page 9.

iii) a continuous selection and validation of all information gathered, through a teamback procedure in which team members collectively test all observations and recommendations for validity, relevance and materiality.

METHODOLOGY

The Department

The study was limited almost entirely to the Education Program as it functions in the Saskatchewan Region, so that only limited discussions and interviews were held with officers at DIAND Headquarters. At the Regional level, however, more extensive interviews were carried out. They included the Director General, senior officers of the Regional Office, and all officers of the Education division. In addition, each of the District Offices and Shellbrook Agency were visited, and in-depth studies were carried out at Touchwood/File Hills/Qu'Appelle and North Battleford.

ACKNOWLEDGEMENT

There is little doubt that this study could not have been successful without the willing co-operation of all those who responded to requests for interviews and for information. A real sense of concern about the Education Program was expressed --- in many perspectives, of course --- by all those who took part. It is because of this expressed concern that the Study Team is able to submit a report of this kind with some hope and confidence that all concerned will make some contribution to the task that lies ahead if success is to be achieved.

SECTION I

INDIAN CONTROL

Preamble

This section of the report deals specifically with the question of Indian control of Indian education.

Observations and recommendations were made in the context of the concept and commitment presented in the foregoing report summary. They deal with the principles and policies which are considered to be inherent in the over-riding policy of Indian Control; and they indicate the manner in which those principles should be applied if Indian control is to become meaningful in the sense of program management.

In the absence of a clear and accepted definition of control, efforts to transfer control of education to individual Bands have been largely unsuccessful.

The premise upon which this examination of Indian control has been based is that control is exercised by whoever sets the objectives or goals to be achieved, and also decides what to do if actual performance is not acceptable (in terms of the objectives). Consistent with this premise is the corollary that the administration of a program, i.e., the actual carrying out of the operational activities, does not constitute control. In specific terms, for example, the signing of a cheque to pay a teacher or a bus driver does not achieve control of the results being produced.

In accepting all the administrative tasks of running a school, in the name of control, Band personnel can be caught in the possible anomaly of appearing to be unsuccessful in the eyes of their community, when in fact the program was perhaps predestined to fail because the Band Chief and Council do not have the authority to make management decisions.

Key components of the management process are:

- (i) a set of goals or objectives
- (ii) a means of measuring (comparing) actual results against these objectives
- (iii) analysis of variances to determine their cause
 - (iv) corrective action.

In some cases, goals have been set forth in subjective terms, but none were found where useful targets (in quantifiable or objective terms) had been established. Futhermore, information systems were not in use to identify variances (even in subjective terms), and therefore no cause /effect analysis was being carried out.

In response to complaints or concerns expressed by the (Band) community, some Chiefs and Councils arrived at conclusions about what to do (e.g., have all the children go to school on the Reserve), but found themselves unable to make the appropriate decision (e.g., build a new larger school on the Reserve) because they had no control over capital funds. In any case, an effective information system may have provided the basis for a better solution to the problem.

It is recommended that:

- the control of Education by Indian Bands be identified in terms of the management process, rather than in terms of administrative duties (refer to Exhibit I).

CONTROL

The management of any given activity, process, project, etc., can be illustrated by the attached control model. It has four essential components:

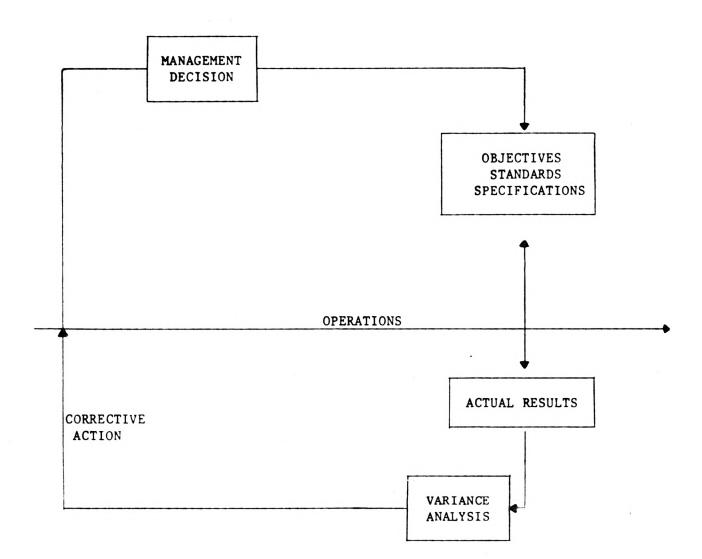
- a set of standards, criteria or objectives which constitute the specifications of the desired output or product
- a means of measuring (evaluating actual results against the established specification)
- an analysis capability to determine the cause of any undesirable variances which may occur
- a response mechanism to take corrective action on the causes of the variance.

The first level of the response mechanism (corrective action) is included in the task of operational management, but is only set in terms of bringing operations into line with the established specifications. If correction is not achieved, then the response mechanism reverts to those who are in control, where strategic decisions must be made (e.g., select a different delivery system; modify the specifications, etc.).

Two principles must be clearly recognized as key components of effective management:

- (i) The operational component (the delivery system) of an activity does not exercise control; it simply responds to the stated objectives
- (ii) Control is exercised by the person or the persons who set the objectives (specifications), and who decide what action should be taken if the operational component does not meet those objectives.

In applying those principles, it is important to understand that both the management and operational components may be carried out by the same person (e.g., a teacher) in the case of personally set goals.



Bands identified as having control of their education activity (schools) are actually carrying out an administrative rather than a management role.

Seven Bands have been identified by Region as having partial or full control of their schools, but examination of agreements, and discussions with Bands Chiefs, indicate none of them actually control the education activity.

Education services, which are described by the Department as under Indian control, are administered by Bands in accordance with "arrangements" signed by the Band Council and the Department. These arrangements constitute the administration of a Departmental program by Indian Bands, rather than Indian control of Indian education.

Responsibility and jurisdiction over the program clearly remains with the Minister (as it must under Section 114 of the Indian Act).

Program objectives are to be set by the Department and program delivery is to be monitored and evaluated by the Department. In some cases, agreements between Band and Department do include some fairly clear and specific objectives as a result of Band input, but the Band does not have the authority to make decisions which might help achieve those objectives. Bands are neither encouraged nor given the means to investigate or develop philosophic or pedagogic alternatives. Bands must follow procedures laid down by the Department even to the extent of using Departmental financial reporting forms.

In essence, the Band Councils that sign such "arrangements" become extensions of the Federal bureaucracy.

This contention is supported by an examination of Departmental Contribution to Bands Program Policy and of the Contribution Arrangments themselves. On 2/3/79 the R.D.G. sent a letter to all District Managers, clarifying C. to B. Program Policy. Two quotes will serve to illustrate that, within this policy, Bands administer, not manage, and they do so on behalf of the Department.

The letter opens, "Since the inception of the C. to B. program, Bands have played an ever greater role in administering programs". It continues, observing that, "... the right and responsibility of the Department is recognized in ensuring that recipients... follow agreed procedures to control the proper receipt and disposition of funds."

A Band may administer a departmental program if it is deemed by the Department to be "willing and capable". To show that it is so willing, a Band must submit a B.C.R. stating that it will adhere to the terms and conditions of the C. to B. Program, and to that Program's objectives and conditions. This framework is to be found in all contribution arrangements and it clearly establishes the Band's subordinate role.

The Band Council agrees to administer the education program, within the framework of existing Federal Government policies and regulations, and to be "responsible and accountable to their Band members and to the Department."

The Department retains ownership of all facilities and furnishings and, "(the Department) will continue the monitoring of program delivery... (and) in conjuction with the Band Council, carry out reviews and evaluation to determine the achievement of program objectives".

In the event of serious maladministration, the Department retains the right to "reclaim the Activity".

Even within its limited mandate, the Band is kept on a short lead, e.g., its Financial and Personnel Regulations must be approved by the RDG; it must prepare monthly financial statements on forms provided by the Department and submit the completed forms by the 15th of the following month; it receives a three month advance at the start of the year, but disbursements are on a monthly basis thereafter.

In effect, the agreements say the Bands can run the program, as long as they do it according to Department directions or stipulations. As a result, the Bands find themselves involved in extensive and (to them) complicated procedures, but do not in fact take any real part in a decision-making process with respect to what they want from the school.

It is recommended that:

- agreements with Bands to control their own schools (Education program) be cast in terms which recognize the right of the Band to make their own decisions.

"Effective implementation of Indian Control of education" is included as a program thrust in the Saskatchewan Region Action Plan for 79/80 but cannot be successful under present constraints.

A major constraint in the Education Program is dollars: not only in terms of total resources, but also in the way the resources are distributed and manipulated by HQ_{\bullet}

Total resources are normally acquired from the environment by Management, (on which management dicisions are made). In this case there is no clear and stable commitment by the Department on which Bands can depend as a basis for management decisions. Original budget submissions from the Band level are modified by HQ without subsequent consultation; further cuts and adjustments are made during the year, so that plans (decisions) based on original amounts must be abandoned, even though such changes in plans may have a negative impact on the community (e.g., family heads on welfare rather than being employed, which in turn is detrimental to family support of student needs).

Further constraints are imposed by the structure of the Budget itself. There are eight different Vote Control Codes (in Votes 10 & 15), under which moneys are transferred to Indian Bands for educational activities, support services, and capital projects. Moneys so designated may not be moved from one VCC to another without T.B. approval; this effectively blocks any decision at Band level as to the best use of resources to provide optimum results. (Note: there are also ten other VCC codes covering Social Services, Community Development, Economic Development, controlling moneys which have important impacts on Education).

Another constraint lies in the fact that most of the moneys allocated to capital projects (VCC 200) are not distributed to the Bands, but are retained by the Regional Office (under the DE) where priorities are set and allocations made in response to discussions at the Band level.

Perhaps the most serious constraint on Band control, particularly in terms of resource utilization, is that component of the budget process in which District offices and Regional office are able to determine their own (financial) needs without reference to the wishes, opinions or self determined needs of the Bands. Resources to provide program administration and support are unilaterally decided on (See EX.II) and moneys are "siphoned" off the total package, even though such support is not always wanted by Bands and is not always provided in the manner stipulated.

Futhermore, the amounts of money allocated to these areas (Region & District) are very difficult to identify in the financial reporting system, since all wages, salaries, and allowances, for District Office staff and school staff, are lumped in VCC 100 and all operating expenses are lumped in VCC 102.

In view of these constraints and others described in other pages of this report it is difficult to believe that there is a real commitment, by the Department, to the fact of Indian control.

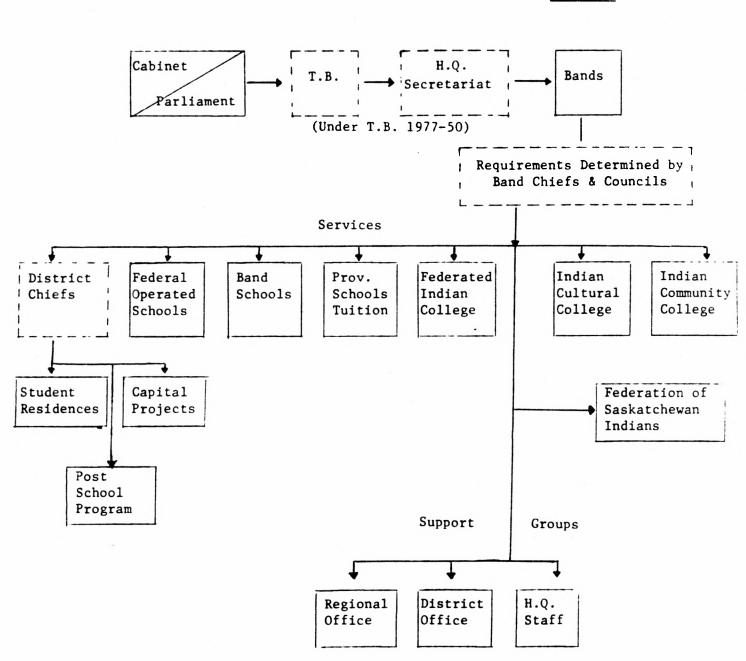
On the assumption, however, that there is such a commitment, that in fact the Government accepts the fundamental principle that the Indian people are entitled to make their own decisions about their own lives (specifically, education needs), it is recommended that:

- dollar resources be allocated to Indian Bands for educational purposes, on the basis of an agreed commitment on the part of the Government of Canada to provide such resources
- the funds so calculated be transferred in total to the 68 Indian Bands, as the first step in the allocation process (See EX. III)
- services provided at District and Regional Office levels be determined in terms of Band requests, and that necessary funds be transferred from original Band allotments on the concurrence of the respective Chiefs
- all moneys transferred to Bands for any education purpose be included in only one Vote Control Code, to facilitate the allocation of such money in accordance with Band decisions.

Note:

It should be noted that these recommendations will not necessarily have any immediate effect on the budget structure but when approved in principle they become the basis for sound negotiations between Bands and DIAND. Some Bands may choose to have the Department continue to operate their schools, on an annual management contract basis; others may request special services, on a fee-for-service basis; District Chiefs may agree to necessary allocations of funds so the Department can provide infrastructure support services for the wider school system. Where the children from a given Band are now attending Provincial schools, it will be necessary to continue that arrangement until such time as the Band can assess (and act on) the feasibility of having their own school. In any and all cases, the allocation of total resources for Indian Education becomes a meaningful, realistic, budget planning process.

PROPOSED



Although Indian Control of Indian Education was announced as Government Policy in 1973, most of the job descriptions of Education staff do not indicate any responsibility or task relating to the policy.

In a review of a selected set of job descriptions for Department Education personnel, no mention was found in any of the District office jobs, and in only one minor example at Region, regarding the transfer of the Education program to Indian Control.

Conversely, several of the job descriptions include specific items relating to the promotion of the Joint School program. This, it appears, is a reflection of the emphasis on moving to provincial schools during the 1960's.

It is recommended that:

- an officer at Senior level be appointed, with specific responsibility and suitable authority for facilitating the transfer of control of Education to the Band Chiefs and Councils.
- all job descriptions for Education staff be modified to indicate clearly the responsibility towards achieving the fact of Indian control.

The pattern of Indian community development, under the influence of Department administration, has resulted in a lack of training and experience needed to support the management of the Education program.

Years of being the subjects of Department administration have denied most Indian people the kind of experience which they need to manage their own affairs. In addition, on many Reserves there is no community base or infrastructure (such as storekeepers, lawyers, doctors, business men, academics, contractors) on which to draw, to fill community-management positions even on a part-time basis. The few people who have now accumulated some training and some experience in administration or management, and who have opted to stay on the Reserve and help manage the community, are therefore overloaded with the many tasks that must be carried out. This demand on a relatively few people is further aggravated by the demands of the Department to follow detailed complex procedures in whatever programs the Band does take over, rather than emphasize and assist in the development of management capabilities.

Discussions with Chiefs, Council members, and other people in the Indian community, confirm the idea that one of the needs of the Band is experience and training in Band management. Some Bands have refused to take over the Education program because of this lack of management skills.

This lack of management skills has been interpreted by the Department as a reason for delaying the handover of control to the Bands, rather than as a signal to provide resources or opportunities which would help them overcome their deficiencies. In fact, the process of taking over and learning to manage the Education program could be a key device in the larger task of creating some sense of overall achievement within the community.

Band staff training has been offered by the Department, and a number of Bands have used the services offered. This training, however, is almost entirely in administrative (not managment) duties and procedures, such as accounting, purchasing, personnel practices, staff performance evaluation.

It is recommended that:

- the Department focus and intensify its efforts on providing resources to Bands so that they may acquire management training for Band personnel; that a supportive role be adopted by District personnel to assist Bands who elect to take on management responsibilities.

There is at present no educational framework (or "ministry") within which Bands can successfully operate their schools under their own control.

There are several Bands (e.g., LaRonge, Sturgeon Lake, Wahpeton, Sweet-grass) who administer their education program, have made significant improvements to that program, and can report some success in terms of attendance levels, numbers of graduates, and improved levels of community satisfaction. These people, however, cannot be said to have real control of their programs, because they still do not make decisions in respect to many important elements of those programs, and they do not have resources in the form of an educational infrastructure (or "ministry") on which to draw as needed to support their individual schools.

The components of such an infrastructure, well-known to educators and admnistrators, include the following:

- a facility for training teachers (and qualifying them) in professional patterns relevant to the needs of the Indian communities (including native language and culture)
- support group or groups from which curriculum content, as chosen by the individual Band, can be drawn
 - a personnel management facility, for the selection and continuing evaluation of professional staff
- an administrators' association (e.g., The Saskatchewan School Trustees' Association), through which various administrative techniques and experiences can be shared
- a professional (teachers') association, which can act as a responsible body in matters of teachers' obligations as well as their rights, salaries, etc.
- hiring and administrative services (on regional scale) through which salaries, pension plans, holidays, insurance, and other personal matters can be negotiated and administered
- student testing and assistance resources, to evaluate the quality of education being provided, and to provide special assistance where necessary
- library and other resource facilities which can be used as a base for enriched as well as regular classes.

Some progress has been made by the Federation of Saskatchewan Indians (FSI) in meeting some of these needs; for example:

- the Saskatchewan Indian Cultural College was established to provide special material (Indian language and culture) for school curricula
- the Saskatchewan Indian Federated College was established in May, 1976, and offers university courses in Indian Studies and Indian Education
- the Saskatchewan Indian Community College was established in March, 1976, with jurisdiction and responsibility for Adult Education programs for Indian people on or near Reserves and Crown land.

These projects are in a tenuous position at best, because of present Department policy and because of the very lack of an infrastructure which is the subject of this observation. Only the first two, of course, can be considered part of the resources which are essential to a total education system; (the Community College being a primary education activity rather than a support component); but, with the exception of the Indian Cultural College, these institutions are on an almost hand-to-mouth basis, because the Department has made no firm commitment to them in terms of specific financial support.

During the course of this study, efforts on the part of the Regional Office to arrange meetings between the Department H.Q. and the Saskatchewan Government, at which firm policies on financing the Indian Federated College could be set, had not been successful. At the time of writing, it was not known whether the College would be funded next year or not.

In the case of the Indian Cultural College, a further problem exists in that it is not given credibility in the area of curriculum development by all the Bands who already or expect soon to operate their own schools. In addition, several bands are developing their own curriculum, individually, and the Cultural College is not as yet acting as clearing house for material produced.

This overall problem relates to the fact that there is only one level of authority in the Indian community - the Band. There are also seven groups of District Chiefs (including Shellbrook), through which some common programs and problems are dealt with. There is, however, no formal structure through which the needs as identified here can be provided for, administered, and controlled on a wider, e.g., regional basis.

During the past years, these needs have been met through various outside sources: the Provincial Education ministry for basic curriculum content; the Federal government for personnel administration; Saskatchewan and other provinces as a source of trained teachers (in their own content, not including Indian culture and language); education and management consulting from the private sector. But the total structure has not been examined with a view to determining what already exists and what more must be provided in order to ensure a strong support base to the total Indian education program.

It is recommended that:

- the Department provide assistance to the Bands or their representative, and to the District Chiefs' groups, in the matter of identifying and developing an educational infrastructure to support their schools and educational programs.

Note:

In the event that the Bands' decision is to support the institutions already operating through FSI efforts (see p. 17), and to build the whole infrastructure in that mode, those institutions should be given firm and consistent support (including core funding) to permit them to so operate.

It may be that the support structure will be one of the continuing roles which the Department can carry out effectively within the context of Indian control.

In either case, plans for the future must be developed under the direction of the Bands to ensure that the best choice is made to serve their needs.

Three-party agreements between Bands, the Department and School Boards do not necessarily constitute or promote Indian control of Indian education.

A recent development in the pattern of tuition agreements is to have the Band included as a party to the agreement, as was done with the Muskeg Lake Band and Blaine Lake School Unit # 57 (date August 23, 1978). This agreement includes a reference to Indian control as follows:

"And whereas the Muskeg Lake Band will exercise their choice of education, provided by the Indian Act and by the Indian control of Indian Education policy...".

but the agreement in its total content does not recognize the jurisdiction and authority of Band Councils which that policy implies.

This agreement differs from the other DIA/Unit Board agreements, in that funds are transferred from the Department to the Band but into "a separate education account under an education authority" (possibly thereby undermining the authority of the Band Council), which is then required to make payments to the Unit Board. At no point, however, is the Band in position to exercise any real control.

For example:

- the Band "shall verify all statements of accounts ... and those shall be submitted to Canada in order that funds can be transferred".
- "Canada shall forward the said tuition fees to the Muskeg Lake Band on the following format:" (April 1, July 1, October 1, January 1).

In matters relevant to the control of the Education program, the Band is restricted in the same way as in many other agreements which were examined; for example:

- the Band "shall act in an advisory capacity"
- "the Blaine Lake School shall have jurisdiction over the administration, control and operation of all schools"
- the Band may have <u>one</u> member on the Teacher Selection Board and <u>one</u> member on the Marcelin Central Board and the Blaine Lake Unit Board.

Again, in the matter of termination of agreements, this agreement is similar to other agreements examined. The Band has no control in that it cannot act unilaterally; the agreement "shall continue in force unless it is terminated by written notice given jointly by Canada and the Muskeg Lake Board". Another clause suggests that "Canada" (i.e., the Department) may have the option to "contribute to the cost of Indian children in the Blaine Lake School Unit" by means other than provided for in this agreement.

It is recommended that:

- three-party agreements be revised and renegotiated to include options to be exercised by the Band in the event that unsatisfactory results are being achieved.

Note:

This problem will be resolved just as quickly as Bands assume full control over their Education program.

PREAMBLE

TO

SECTIONS II, III, IV

Preamble to Sections II, III and IV

Observations presented in Sections II, III and IV of this report are concerned with situations which require immediate attention, and therefore responsibility for interim corrective action lies with the Department.

When Indian control comes into effect, most of the management processes identified by these recommendations (e.g., collection and analysis of information regarding quality of education) will be the responsibility of the Indian people (Chiefs and Councils). It will be their option to decide how they wish to exercise the various controls which are essential to good management of the Education program.

Careful reading of these sections however brings out sharply the complexity of the total situation facing the Department and Indian people in the matter of arriving at a satisfactory application of the policy of Indian control. Some of the recommended actions or procedures will clearly revert to the Indian people; one or two are clearly the responsibility of the Department (e.g., Head office policies and the budgeting process). Still others are of such a nature that they have regional implications or are part of the education infrastructure. In such cases, the choice may be to have the Department continue to provide those elements of the total program management process, but only in the supportive or advisory role.

Following each recommendation in these three sections, a note is included suggesting where the long-term responsibility for the specific action should lie. This is a suggestion only, since the final decision in each case can be made only as Indian control develops and becomes effective.

SECTION II

QUALITY OF EDUCATION

Failure to deal in totality with environment difficulties has perpetuated a costly education program without real benefit to Indian children.

The proportion of Indian Children graduating from High School in the past ten years has shown little improvement; and the problems of age-grade retardation and a high absenteeism rate do not make it an easy matter to justify the large expenditures made by the Department for the Education Program.

These problems have been addressed over the years by various remedial actions, none of which have done much to improve the situation; in fact, some actions have worsened the situation. In the 1840's, Industrial Schools which stressed manual labour and religious studies were considered the answer. In the early 1900's the residential school embodying much of the Industrial school aspects but also adhering to provincial curriculum were experimented with. In 1940, the Minister of the Interior announced, in a paper entitled "Canada's Indian Problem", that Indians were not "mentally and temperamentally equipped to compete successfully with the white population... Therefore, the training service is not attempting to equip the Indian to work and live in the white communities... To a great extent the service is attempting to help the Indians make their living on their own Reserves". Then in 1948, a Special Joint Committee of the Senate and the House recommended a policy of Integration which resulted in a push towards Joint School Agreements with Provincial schools through the next two decades. In 1973, the Minister of Indian Affairs agreed with the National Indian Brotherhood's policy of "Indian Control of Indian Education", thus setting another new direction or pattern for the education program.

During this evolutionary period the lot of the Indian Child has not improved, and there is little prospect that any marked improvement will be realized unless the true causes of poor program results are addressed.

It is a well established fact that the social and economic status of his parents is the critical factor in determining how well a person is going to do later in life. The recent report issued by the Carnegie Council on Children entitled "Small Futures" concludes that Who You Are not How Bright You Are or even how good your schooling, is the most important factor in determining your future. These findings are fully supported by another report, just released, "Who Gets Ahead". It looks at things like: family background; native intelligence; personality; and years of schooling and their impact on a person's success or lack of success later in life. The findings are that "People who do well economically owe almost half of their occupational advantage to family background; and up to 85% of their earnings advantage later in life is directly related to Family Background".

The National Council of Welfare has concluded "To be born poor in Canada does not make it a certainty that you will live poor and die poor but it makes it very likely".

Finally, a research paper just released in Manitoba, entitled "School Self-Acceptance among Indian, Métis and White Children" authored by Doctors G.E. Barnes and B.A. Vulcano, states in part: "Education is generally regarded as being the ladder to upward social mobility for the people of lower socio-economic status. Our study shows, however, that lower socio-economic groups are in somewhat of a "Catch 22" situation. They need education to improve their position in society, but their lower position in society mitigates against them doing well in school".

The Indian Child comes from a socio-economic environment that may not be conducive to any marked improvement in the results of a new educational program. While "Indian Control of Indian Education" possesses elements that will make school more meaningful and pleasant for the Indian student and thus may produce more effective results, it should be recognized that real progress expected by Indian educators will only be achieved over an extended period of time.

This time frame may be reduced in direct proportion to the effort made to reduce the socio-economic disparities that exist between the Indian and White communities.

It is recommended that:

- environmental difficulties facing the Indian student be recognized and addressed;
- education programs coming under control of Bands be given proper resources and time to accomplish their stated goals.

```
(Responsibility - Short term - DIAND )
Long term - Indian Bands)
```

The Department of Indian Affairs, Saskatchewan Region, will spend approximately \$44,000,000 for Indian education this year, but has no formal information system to determine whether or not the quality of that education is acceptable to the Indian people.

The original budget for Education in Saskatchewan, for Indian children, adults, and related support services, was set at \$37 million (0 & M), plus \$7 million for capital expenditures. This has since been modified downwards, but the change is not significant in the context of this observation.

There are forty seven people, mainly educators, counsellors, etc., on staff in six District Offices and one Agency, whose primary task is to administer the Education program. There are also eight people in the Education section at the Regional Office. The primary task of these people is to manage the Education program, to determine the needs for money spent, and to ensure that the Indian people and the Department are getting value (in terms of education) for that money.

There is no information system in use (i.e., the collection, analysis and evaluation of valid data) which can provide management information on the vital question of the effectiveness of the product being delivered. Some information is being collected, but is not analysed or evaluated in terms of good or bad performance against a given standard, or in terms of cause and effect. For example:

- one Principal's Monthly Report (PMR) showed that over 80% of the children had been absent during one month, for anywhere from 5% to 75% of the time. No reasons for absence were shown, much less any analysis of the total situation
- age-grade retardation data is assembled from time to time, but is not compared to other school systems (e.g., Province of Saskatchewan, other Bands), nor is any possible remedial action identified
- drop-out data is available, and consistently shows serious (almost total) losses through the high school years (e.g., 1% of total students are in Grade XII) but again comparison with other systems and cause/effect analysis are not carried out.

The PMR is the main (and in most cases, the only) report submitted to the Department personnel which contains information about student numbers, attendance levels, and such. These reports, however, are not consistently collected, analysed or responded to.

Finally, there is no regular program of going to the people to determine their views on quality of education being delivered as compared to their set of criteria or goals.

Because of lack of valid and regular information (which precludes cause/-effect analysis), the Department has no way of ensuring that resources used are effective, or whether or not more resources could produce better results in terms of good education for Indian children.

It is recommended that:

- information such as retention rates, age-grade retardation levels, absenteeism, be collected regularly, analysed for cause/effect relationships, and made available to Bands and Districts as a guide to remedial action
- District Education staff maintain a regular and frequent dialogue with Indian people (particularly parents), as a formal means of collecting information regarding the quality of education being received by their children
- the information flow (and the analytical process) so developed be done in a manner which will permit their easy transfer to Bands as requested.

(Responsibility: Short term - DIAND)
Long term - Indian Bands)

Coordination between the Education Branch and the Social Development Branch would enhance the effectiveness of the Education program.

Recognizing that an education program cannot produce effective results if it operates in an environment hostile to the student, the audit included a limited examination of activities at the Regional Office that might modify the present Indian environment. This modified environment would appear necessary in view of high unemployment, a serious alcoholic problem, one of the lowest standards of living in Canada, and a deteriorating housing situation.

The social services programs expend millions of dollars per year in attempting to improve the environment in which the Education programs must operate. The majority of these funds (approximately \$23 million) are in the form of social assistance, which may not provide the type of environment that is conducive to effective educational programs. Operational data were not available at the time of the audit to measure the effectiveness of the Social Development dollar expenditure or human resources utilization as they relate and interface with the education program.

A holistic view of the Indian program in Saskatchewan strengthens the view that the social, cultural, economic, physical and educational thrust by the Department should be indivisible. It is therefore axiomatic that co-operation between and co-ordination of all programs from Headquarters to the Region to the District Offices to the Bands must be meaningful and encouraged if the education program is to be effective.

Clear concise procedures and guidelines to co-ordinate the work of these people is absent at every level including policy from Headquarters. Although personalities at Region or District level will help to soften the impact of such a situation, it is evident that an unco-ordinated and possibly an unnecessarily expensive operation is in being. Excess travel, duplication of effort, conflicting advice to Bands, and ineffective and inefficient operations are quite possible. In addition the budgeting process itself inhibits any co-ordination of effort between social services and education activities.

It is recommended that:

 Headquarters policies and the budgeting process be examined to permit and facilitate realistic co-ordination between Social Services and Education.

(Responsibility: DIAND)

More than 50% of the Indian school children attend Provincial schools, but little control is exercised by the Department to ensure satisfactory results in terms of the quality of their education.

During the 1960's, the policy of integrating Indian children into Provincial schools was vigorously pursued. Agreements were rushed into and ample funds were allocated to pay any bills that came from Provincial schools. The agreements themselves were not monitored or enforced and so were not filed carefully or separately. It is now impossible to locate all agreements at District offices or to know if what can be located represents the sum of agreements between D.I.A. and a particular board.

More than eight million dollars has been budgeted this year (and District projections indicate a total of eleven million) for tuition fees and related costs for Indian children attending provincial schools. There are a total of 8,186 such students, or 54% of the total Indian students in the Region, of which approximately 4950 attend provincial schools under tuition agreements. The other estimated 3,200 live off the Reserve and attend city or provincial schools independently; for these, only minor student assistance costs are incurred. There are over 400 schools involved, as compared to only 65 Federal or Band schools.

It is current Department policy for the Department, the Band, and the Provincial School Unit, to enter into various agreements spelling out the rights and obligations of each party (each contract therefore may cover several different schools within one School Unit). These agreements, however, do not enable the Department to safeguard the interests of Indian children, to ascertain whether or not it is getting value for money, or to promote the policy of Indian control of Indian education.

Until 1967 the agreements comprised a commitment by the Department to pay a proportion of capital costs, to pay tuition fees based on the net average cost per student and to endeavour to ensure regular attendance and standards of health, cleanliness and clothing. In return, the Board of the School Unit was to arrange for construction, accept a number of Indian children, provide them with the same service as the non-Indian students and ensure that there would be no segregation.

The Department was explicitly excluded from any supervision over curriculum, administration, personnel, methods, materials, and management. However to quote a typical agreement, "Education officials and any other person authorized by the Band shall have the right to visit the school from time to time".

From 1967 the clauses referring to attendance, health, cleanliness and clothing and segregation were removed.

From 1970 a clause was inserted whereby the Board would "make every effort to provide an educational program suited to their (Indian students') needs".

In no case, of those examined, were there any clauses, specifications, etc., which would indicate any kind of performance standards, quality of education, or other qualitative requirements which might be expected to be required on behalf of the Indian children. In fact, the majority of the agreements include a clause or clauses similar to that found in the Muskeg Lake agreement:

"The Blaine Lake School Unit shall have jurisdiction over the administration, control and operation of all schools in which Indian children are enrolled under the terms of this Agreement, including the employment and supervision of professional and paraprofessional teaching personnel and all matters relating to the curriculum, methods of instruction and material used for instruction in such schools; it being understood and agreed that the exercise of such jurisdiction by a school board established pursuant to the Public Schools Act of Saskatchewan in respect of any such school shall be deemed to be the exercise of jurisdiction by the Province".

The examination of these documents, plus discussions held with nearly twenty Bands throughout the Region, leads to the clear conclusion that Indian children who go to Provincial schools must accept what they get from the regular curriculum and teaching program. Having their needs met in the form of Indian culture, Indian history and language, could be advantageous to them in their individual tasks of competing with non-Indian children who operate in their own, more comfortable environment. These needs, however, are not being met through School Boards' initiatives, and are not effectively demanded by the Bands because of their relatively weak position within the agreements.

Since 1978, clauses have been inserted to allow for special programs (for which the Department must pay extra), the involvement of the Indian community, and assistance from the Department for the Band in a cross-cultural education program. (There is no monitoring, however, to ensure such arrangements are honoured).

In signing these agreements, the Department: 1) commits itself to accepting standards set by another body, the school board; 2) fails to include any performance conditions; 3) fails (until 1973) to include any termination clause; 4) has no sanction available, except for termination; 5) fails to ensure community involvement; 6) fails to build in adequate monitoring of Indian students progress.

It is recommended that:

- all tuition agreements be called up for review; and that each Band affected make arrangements for new agreements setting forth standards of performance and including authority for the Bands to ensure standards are met.

(Responsibility: Short term - DIAND)

Long term - Indian Bands)

Teachers hired by the Department for work in Federally operated schools have almost no orientation instructions, which may impair their effectiveness to an unacceptable level.

Teachers recruited in Canadian Metropolitan areas and from overseas have, in most cases, no orientation instruction in the new environment in which they are about to work. In many instances these new working areas are in remote locations and Indian community life will be a new experience for the teacher. A lack of appreciation of Indian values and customs can adversely affect the teachers' rapport with the student, the parent and the Band as a whole.

A check by the auditors with Canadian University Students overseas (CUSO) and Canadian World Youth (CWY) established that these organizations place considerable importance on conducting extensive orientation courses for new candidates (up to 8 months for CUSO and up to 4 months for CWY). When this is compared to the 3 day course conducted for only a limited number of teachers hired for Federal schools in Saskatchewan, it may lead one to question whether such a limited exposure to a considerably new environment and culture gives the new teacher a proper start.

Possibly a more important product stemming from a proper teacher orientation course is the screening out of unsuitable candidates. The real danger is not in hiring the teacher that starts the job and the resigns after a few weeks or months. The danger lies with the poor teacher that is hired under the present limited interview method and stays with the system for years, never establishing proper relations with the Indian people. A few of the outstandingly poor teachers have been expelled from Reservations by Band Council Resolutions (BCR) and are now employed in Regional and District Offices on lesser tasks but are still drawing teacher salaries.

It is recommended that:

 a comprehensive orientation course be established for all new teachers and during this course a screening process be actively pursued.

(Responsibility: Short term - DIAND)

Long term - Indian Bands)

SECTION III

MANAGEMENT

The organization structure in the Region is a major factor in reducing the effectiveness of the Education program.

Although the Education program is the largest (and only major statutory) program, it does not enjoy a prominent position in the organization structure of the Region.

The Director of Education (DE) occupies what amounts to a staff position, reporting to the Director of Operations (DO). Futhermore, the District Superintendents of Education report to the District Managers (DM) who report to the Director of Operations. There is, therefore, no direct control exercised by the DE over program operations in the field, and although he does have a functional relationship with DSEs, decisions (particularly matters relating to other programs) are made through the DM/DO route.

This organizational structure undoubtedly has contributed to the situation (discussed elsewhere) where DSEs are spending up to 90% of their time on administrative (financial) activities and on maintenance work at the schools. The need for them to do such work is largely dictated by the situation that exists in each District office, in respect to non-availability of other staff groups (i.e., Finance and Administration, and Engineering) to carry out such duties. Futhermore, Band Chiefs and staffs tend to go to the DE or DSEs on matters concerning school problems (e.g., maintenance) which should properly be dealt with by someone else in the organization.

A further complication arises in the relationships between Regina and HQ. There is no senior position at HQ in which responsibility for the Education program is seen to be centered. There are, rather, a number of staff positions concerned with policy, education and skill development, education standards and systems, and operations and analysis, none of which are recognized as a senior position carrying the responsibility for program performance.

Any change in the organization structure of the Education group would, of course, have an impact on the rest of the RO and HQ structures, which latter were not examined during this study.

It is recommended, therefore, as an interim measure that:

- insofar as the Director of Education occupies a staff position, and the Director of Operations exercises control over program operations through the DO/DM/DSE route, this reporting/accountability relationship be clearly communicated to the Bands to assist them in dealing properly with operational and information needs
- action be taken by the DO and DMs to ensure that District Superintendents of Education and their staffs devote all or most of their time to those duties which relate to the education program; and that the Director of Education be given the authority to monitor the use of the resources on an ongoing basis.

(Responsibility: DIAND)

The role of Education personnel at Region and District is not being adjusted in response to developing patterns of Band activities.

The transfer of more responsibility and authority to Indian Bands, in accordance with the policy of Indian control of Indian education, has already had some impact, and will have more and more impact, on the roles of DIAND Education staff at Region and at District. There has been no planned action, however, to effect appropriate changes in those roles, in a manner not only to facilitate the development of Indian control but also to ensure that experienced Education personnel can make an important contribution to the new concept.

The major change in the present roles would be from one of directing education programs to that of advising Bands and their Education Committees when such advice is requested. There is little doubt that, in the early stage of transferring program responsibility, the Bands will require considerable assistance in the management of this complex program. The Bands, however are looking elsewhere for such assistance. In North Battleford District for example, the Sweetgrass Band (who now administer their own program) hired an outside consultant to help plan and develop an Education program within the community.

Present Educational staffs, particularly those at the District Office level may find this role change, i.e., from director to advisor, a difficult transition to make, particularly since many of them have had long experience in a role more akin to a Master/Servant relationship.

It is recommended that:

- the Regional Office develop and implement newly-defined roles for Education staffs, consistent with the concept of Indian control
- the Department's stated aims be translated into organizational plans and operating policies and that these latter be communicated to all concerned.

There is no clear recognition of responsibility, by the Department, for the education of Indian children who have left the Reserve and now live in urban centres.

The present policy of the Department concerning Indians who have taken up residency off the reservation is that the Department is not responsible for providing education facilities or financial assistance after one year has elapsed. These responsibilities have been assumed by the Province without consultation with or agreement of the Indian people.

The Indian people in Saskatchewan feel strongly that education is a right flowing from:

- a) Treaties 2,4,5,6,8 and 10 all of which mention education.
- b) B.N.A. Act Section 91 Head 24 which states that the Federal Government is responsible for Indians and lands reserved for Indians.
- c) The Indian Act Section 114 through 123 inclusive.

Neither the Indian Act or the B.N.A. Act have any stated residency requirements. Section 4(3) of the Indian Act does say that "Sections 114 to 123 do not apply to or in respect of any Indian who does not ordinarily reside on the Reserve...", but does not define further what "ordinarily reside" means. Paragraph 4.9 of the E-1 Program Circular 1 issued by the Department on November 1, 1978, says: "except during the first twelve (12) months of residence off-reserve, the Department of Indian Affairs will not accept financial responsibility for education to such status Indian schoolage children".

This, however, is a unilaterally imposed Department policy, and has not been accepted by the Indian people. The Indian people see any encroachment on their education rights as a violation of their constitutional, statutory or treaty rights.

This lack of a clear definition of responsibilities affects a considerable number of Indian children, and their dismal academic and employment status

may be partially due to this transfer of responsibilities. For instance the following statistics (as reported in an FSI study) apply to the city of Regina:

- 8000 9000 status Indians live in Regina
- 2000 2500 school age
- 30% are 2 to 3 years behind proper grade age level
- 75% drop out before reaching high school
- Only 3 graduated from Regina high schools in 1978 1979
- 800 between 15 19 years neither attending school or working

It is recommended that:

- the Department clarify its position on residency as a factor affecting education, and that any arrangements with Provincial Governments have the agreement of the Indian people concerned.

(Responsibility: DIAND)

The present procedures used to acquire school bus services lead to perennial problems and reduce the amount of protection available to the contractor.

The present system to obtain school bus services for Federally operated schools splits the responsibilities between the Education Branch and Economic Development.

Education defines the requirements and budgets for the services and is responsible up to the completion of tendering and selection of the Contractor. Economic Development then takes over and assists the contractor in obtaining loans to purchase his equipment.

Each year, usually during the first month of school (September), problems with transportation interfere with the smooth start-up of the school and encourage parents and children to commence the absenteeism cycle. Later on in the year some contractors experience financial difficulties and these difficulties are usually manifested in discontinuance of or interruptions in bus schedules.

A separate but relevant factor in this situation is that the school bus often provides services in the community other than transportation of students to school. Such services are a need that probably should be assessed (and met) through the Community Affairs or Economic Development approach. In the meantime, they are a disruptive influence in the school program; they increase costs (a more rapid rate of deterioration of buses); and they add to the administrative problems of the Education staff.

In line with the recommendations in this report to relieve Education personnel of all duties not directly related to education and their functional expertise and because bus contracts can impact on Indian employment, it is recommended that:

- the responsibility for obtaining school bus services rest with Economic Development Branch with clear contractual responsibility to meet requirements identified by Education Branch
- pre-tendering conferences be held with prospective contractors to ensure that they are in a position to submit viable tenders
- tenders be reviewed and only those judged to be economically viable, considering total community needs, be considered.

(Responsibility: Short term - DIAND Long term - Indian Bands)

The frustration and possibly the lack of feeling of accomplishment on the part of most District Superintendents of Education is having an adverse effect on the accomplishment of Departmental Education Programs.

Rarely does an operational review of a government department directly address matters such as attitude, dedication and morale of personnel because such situations can become extremely controversial, and in the end, very difficult to quantify or prove to Management. Despite these misgivings, this review will address this subject because the attitude of Departmental personnel truly has an effect on the total Education program that cannot be ignored.

The Education personnel carrying out the Education programs at the district level are academically qualified to do so; but the lack of meaningful progress, the financial systems that require year after year an ever increasing amount of their time, and their inability to perform educational duties for which they are qualified, lead to a feeling of frustration. This feeling of non-accomplishment is having an adverse effect on DSEs and their staff to the extent that the implementation of the policy on Indian Control will require a major realignment of attitudes.

In recent months, three of the six positions for DSE have become vacant. As is the norm in the Public Service, the next qualified person in line for this position stands an excellent chance for the promotion. However, in present circumstances, the acting DSEs are not all that enthusiatic to assume the job.

The recommendations to alleviate this condition must be considered in concert with other recommendations made in this report which affect the role of the Indian Education Program.

It is recommended that:

- the role and authorities of DSEs be clearly defined in line with the departmental thrust of Indian Control of Indian Education
- the DSEs and staff be relieved of the many administrative duties that impede their efforts to act as educators and to promote an effective educational program in the Province.

(Responsibility: DIAND)

SECTION IV

RESOURCE UTILIZATION/PROTECTION

Although more than \$37,000,000 (0 & M) will be spent this year on education for the Indian people in Saskatchewan, it is almost impossible to relate expenditures to program performance.

The budget control system, with various Vote Control Codes, Responsibility Centres, and Functions, may serve some good purpose for corporate financial management, but it does not facilitate operational control in terms of how the money is (or should be) spent for best program performance.

There are three main components of the school system provided for Indian children: Federal schools, Band operated schools, and Provincial schools. There is, however, no data produced on a regular basis to indicate the total cost, or cost per student, for each of those systems. In fact, there is no financial data produced, for management analysis purposes, on the cost of operating any one school or school system. Some of the weaknesses are:

- tuition costs for a Federal school are included in Vote 100 (salaries & wages), which also, in any one District, includes the salaries & wages of District staff, maintenance staff, and other non-teaching personnel
- the cost of transportation by school system cannot be analysed, especially where a Band (e.g., Thunderchild) has bus contracts to carry children to both Band schools and Provincial schools
- capital costs are not included in Band or District budgets, so that any analysis of comparative costs between Federal and Provincial systems is difficult
- student maintenance costs are reported in two different Votes, six or seven Vote Control Codes, and five Function codes
- instruction costs in Federal schools are costed to Function code No. 3003, but for non-Federal schools are costed to Function code 3009.

In summary, there is no regular cost analysis to indicate whether the Federal, Provincial or Band school arrangement is most effective, or to what extent one varies from another. To extend this in terms of planning, for example, there is no data to determine how much money a Band should have to operate a school at a satisfactory level for a given number of students.

It is recommended that:

- cost data be accumulated in a manner which will permit Band chiefs and councils, as well as Department management personnel, to determine the relative costs of the several systems, and to set practical targets for optimum cost performance.

(Responsibility: Short Term - DIAND)
Long Term - Indian Bands)

There is no apparent rationale in the budget or management process by which manpower resources are allocated to and within the programs.

The Education program is the largest in the Region, not only in terms of dollars spent (\$44 million of \$101 million) but also in terms of operational activity in the field. The Education activity includes 53 federally operated schools and seven student residences, with approximately 500 employees. There is no equivalent field activity in the other programs. In order to plan and direct this program (44% of the budget and over 60% of all employees) there are only 8 people (5 officers) at the Regional office, and 47 people located in six District offices and one Agency office. This amounts to about 18% of approximately 300 "administrative" person-years.

Within the Education program, there appears to be some further inconsistencies. Prince Albert District, for example, has ten authorized person-years (for Education), in a district that covers nearly half the province; has 3900 students; has a budget of over \$8 million; operates 7 schools and one residence; and administers to 113 employees. Yorkton District, on the other hand, has 6 authorized person years (8 on strength as of June 79) in much smaller district (geographically); with 1350 students; 5 schools; one residence, only 54 government employees; and a budget of approximately \$3. million.

While it is appreciated that there are many factors affecting manpower requirements, it is difficult to arrive at any conclusion other than that the Education program in total has not been staffed as well as other programs and that some Districts are carrying a much heavier workload than others.

It is recommended that:

 staff requirements for the Education program at Region and District be adjusted to be more in line with the apparent importance of the program.

(Responsibility: Short Term - DIAND Long Term - Indian Bands)

Education staff at District Offices are devoting a disproportionate amount of their time to Administrative activities at the expense of their educational responsibilities.

Superintendents of Education and their staffs at District Offices all have stated that Administrative type work requires the majority of their time with much of it spent in the District Office. Examples stated were such things as budget preparation and financial control, certification of invoices, preparation of work orders for school repairs and action plans for Regional Office. Staffing positions was also cited as a time-consuming cumbersome operation. Two DSEs have stated that overtime is now routine for their staffs just to accomplish the bare essentials.

Their prime function, visits to schools and monitoring the quality of education, is now becoming a secondary duty.

A check at Regional Office revealed that there were no directives published by the Region that would allow less expensive resources to relieve the education staff of these administrative chores. However, the Regional Personnel Manager has stated that he has recently produced four draft directives but their distribution is delayed until each District Office can be personally instructed in their use.

It is recommended that:

- a review of the administrative work presently being done by District Education personnel be conducted to ensure that this work is necessary, that it is the responsibility of Education personnel, and that it cannot be done with less expensive resources.

(Responsibility: DIAND)

Inconsistencies and duplications in job descriptions for Education personnel are indications of weaknesses in the organization structure.

It is evident that job descriptions for Education personnel at Region and Districts have been written or revised only on an "as required" or ad hoc basis without being coordinated into a management task designed to achieve the primary mission of providing quality education to the Indian people. In fact, job descriptions apparently play little part in the management of the program since a number of them for key positions on file in the Personnel Department are seriously outdated:

Supt. of Continuing Education - May 17, 1968
Coordinator, Education Services - February 12, 1975
District Supt. of Education
North Battleford - May 30, 1968
Supt. of Education - Shellbrook - (no date)

More important from a management point of view are the anomalies which are found (in those duties listed versus those found to be in practice) in some of the jobs. For example:

- (i) The District Superintendent of Education:
 - establishes priorities on repair and maintenance
 - compiles initial estimates
- (ii) The Superintendent of Elementary and Secondary Education
 - includes responsibilities which would appear to belong to the DSE
 - is involved in Financial and Administration matters, long-term planning capital projects, broad educational projects and student transportation
 - evaluates DSE performance (although they do not report to him)
- (iii) The Regional Education Development Analysis Officer
 - develops methods and procedures
 - evaluates education program procedures
 - plans school and guidance staff needs
 - directs and coordinates the preparation of regional education budget.
 - reviews monthly financial statements and reports
 - monitors the maintenance program
 - devises methods of improving financial management in DO's.
 - plans and directs the Student Residence program

Of some interest too is the fact that of eight jobs reviewed, six of them include "contact with Indian parents", and all eight include "contact with Band councils". Since Department personnel from Social Services, Economic Development and Community Affairs also contact parents and Band councils, it appears that a serious time load would be imposed on the Indian people just to receive and talk to all their visitors.

It is recommended that:

- all job descriptions in the Education activity both at Region and at Districts, be reviewed to ensure they are consistent with program objectives, that they define specific roles without undue duplication, and that they exclude all activities which are not related to the Education program.

(Responsibility: DIAND)

The lack of clearly defined responsibility for school day-to-day maintenance problems has resulted in Education personnel carrying out these duties at the expense of primary responsibilities.

At District offices and at the schools within the District, Education personnel are perceived as being responsible for the day-to-day maintenance problems that arise. In fact, in some Districts routine school maintenance problems occupy the major portion of the DSE working day. On the other hand, interviews with Engineering personnel clearly established the fact that they feel that they should be responsible for school maintenance. Since technical skills are required in many cases to allow an assessment to be made as to the cause of the maintenance malfunction and the remedial action required, the Education personnel are carrying out duties which they may not be capable of performing.

The Regional Engineering Branch is now establishing at each District Office an engineering section which will be capable of assuming maintenance responsibilities for schools.

It is recommended that:

- at those districts where engineering personnel are located, school maintenance duties be assigned to them immediately, with accountability to the Education program clearly defined
- action be taken to provide engineering expertise at the District offices where it is lacking.

(Responsibility: DIAND)

Excess costs and serious delays are occurring in school construction projects because of ineffective project management control and lack of clear authority vested in DIAND Engineering & Architecture Division.

In the majority of interviews with the District Education personnel and in discussions with Indian education personnel on Reserves, several inadequacies in the school capital programs were highlighted. Such things as, inordinate delays from T.B. approval to construction completion, excessive cost overruns, and a quality of workmanship that too often did not measure up to standards that are considered acceptable, are becoming more commonplace and are detracting from the effectiveness of the Education program.

There are numerous examples of delays in construction after the decision has been rendered that new school construction is required; for instance:

- (a) Montreal Lake Selection of Architect October 1978 one year later design not completed
- (b) Beauval School Addition ten months behind schedule
- (c) Red Earth School estimated time of 6 months had to be increased by 5 months.

Cost overruns in school construction are now quite common occurrences and some of the excesses are large enough that considerable difficulty may be encountered by the Department in obtaining T.B. approval. The following examples may serve to illustrate this point:

(a) Joseph Bighead School

-	Original total project cost -	
	School and water system	
	December 1978	\$570,000.00
-	Financial Report of	
	PWC May 1979	\$775,000.00
_	Possible total cost (estimated)	\$805,000.00
_	Approximate % overrun	41%

(b) Mosquito Grizzly Bear

=	Original estimate	\$801,000.00
-	Final cost	\$925,000.00
-	Approximate % overrun	15%

(c) Pasqua Muscowpetung

- Original estimate	\$900,000.00			
- Final cost	\$1,245,000.00			
- Approximate % overrun	38%			

The poor quality of construction was often cited by Band and District Office personnel as a prime source of annoyance and an unnecessary drain on resources. It was stated also that poor estimating on new projects may often occur.

There are two elements concerned with Public Works Canada (PWC) quality control procedures. The first element concerns the actual supervision of jobs to ensure first quality work. At the Red Earth School the water and sewer system was installed ignoring specification instructions, backfilling was carried out prior to testing, underground cables were severed accidentally and the completed system had excessive leakage. The same lack of quality control occurred at Pasqua Muscowpetung school where deficiencies in both design and construction led to failure in the school water supply and necessitated costly repairs.

The second element of concern in the PWC quality control procedure is the lack of a warranty or guarantee when PWC acts as both designer and contractor for DIAND. If any repairs are required, regardless of their cause, DIAND must bear the costs even if these repairs are required one day after completion of the job. For example the water system at Waterhen froze during its first exposure to winter temperatures.

Finally, the cost per square foot for construction of schools, funded by the Federal Government, may exceed the costs encountered by Provincial School Boards in the same approximate area. Since it is extremely difficult to define from existing cost data how square footage costs are calculated, the following costs figures are given for possible further investigation by the Department:

-	Provincial	 1976		1977	_	average	square	ft.	cost	\$43.91
-	Provincial	 1979	-	1980	-	average	square	ft.	cost	\$56.00
-	Federal (J. Bighead					_	•	ft.	cost	\$79.00
-	Federal cos	-			•	0	-	imat	ely	41%

If the above Provincial and Federal square foot costs have been calculated in a somewhat similar manner, the more expensive Federal costs may be due in part to the price of doing business through PWC and/or a lack of control in tender evaluation and construction supervision.

The Regional E & A personnel are well aware of these problems and are endeavouring to rectify the situation locally.

It is recommended that:

- action be taken at the Regional level with support requested from H.Q. if necessary, to ensure:
 - that for each capital project (Education program), precise specifications be drawn up and more accurate estimates be made in the first instance
 - that DIAND (E&A) be held accountable to the appropriate Education authority as overall project manager, including the management functions normally carried out by a prime contractor
 - that all excess costs over and above comparable Provincial projects and over and above original estimates be investigated for cause
 - that contractors (including PWC if used) be held responsible for delivering at estimated costs, buildings which fully meet the specifications, or, paying for necessary repairs and modifications
 - that all sub-contracts include penalty clauses to compensate fo failure to deliver on agreed time as per specifications.

These are interim, immediate action items for the Department to implement.

It is further recommended that:

- the management of capital projects be handed over to Bands as soon as possible, thus eliminating some of the potentially costly steps in the present process.

The role of Student Residences as an important component of the Indian education system is diminishing under financial and social pressures.

There are seven Student Residences in the Region, in five different districts, operating at a total cost of \$5,282.8k (original 79/80 allotment) and accommodating 1091 students.

There is no clear policy, strategy, or plan, in the Department's approach to Education, which identifies or determines the present or future role of these establishments. All of these schools are (or were at one time) residential schools, where students from remote Reserves, or from neighboring Reserves where no schools exist, are provided with board and lodging while they attend school. In some cases school and residence are in one building; in other cases in adjacent buildings; and in still others some or all of the students attend Provincial schools in neighbouring towns or cities.

In the last few years, negative financial pressures have been exerted on these Residences by the Department, by limiting their dollar allotments even though inflationary effects would require more dollars to maintain a given level of service. The number of students in the Residences has not decreased, so that their actual situation has worsened.

What might be called a "normal" role for these support facilities would be to house students who have no alternative means of acquiring an education; e.g., living in remote areas, too far from any school to be able to commute daily.

The role, however, has changed in recent years. The residential facility is now being used more and more (90% in one case investigated) as a haven from broken homes; in other words, a welfare resource. This is not conducive to a productive educational environment, but has reached the point where the administrators are not sure whether they work for Education or Social Services.

A further problem is that the Residences cannot nearly meet the demand. In one unit which accommodates 125 students, there are this year a total of 289 applicants. With such pressures, and with priorities more and more oriented to "Social Services", the point has been reached where no one student can count on remaining from one year to the next, resulting in another negative effect on the whole education process.

The consensus gained through this study is that the Residences are an important and necessary part of the education system, and that their role as such should be re-emphasized.

It is recommended that:

- the Residence be recognized as a necessary facility to provide education opportunities to Indian children who otherwise would be excluded;
- the Residences in each District be put under the control of the District Chiefs, who would establish entrance requirements and priorities.

(Responsibility: Short Term - DIAND)
Long Term - Indian Bands)

SECTION V

ACCOUNTABILITY

ACCOUNTABILITY

Accountability is a term that has been used fairly extensively, in management circles, without being particularly well defined. In addition, it has often been used synonymously with "responsibility", which in some cases is a valid synonym and in other cases is not. Webster's dictionary gives one meaning for "accountable" as being "answerable": probably the best choice in this context, because it is generally agreed that accountability infers, at least, that some one person or body is accountable to some other person or body. It is usually inferred, also, that the person(s) to whom accountability is owed may take some kind of corrective or disciplinary action against the person(s) owing it, if results are not satisfactory.

In the Government in the past few years (particularly since the appointment of a new Auditor General and the creation of the Office of Comptroller General), emphasis has been placed on the need for each responsible manager to be accountable to his own Department, and eventually to Parliament and the people of Canada, in three clear perspectives:

- achieving program objectives (effectiveness)
- ensuring optimum use of resources (efficiency)
- ensuring objectives are achieved at least possible cost (economy)

Given that definition and interpretation of the term accountability, it would then seem reasonably easy to identify and define the accountability necessary for the management of the Indian Education activity. There are two different situations to respond to: the present one, where DIAND runs the program; and the proposed one, where the Indian people (Band Chiefs and Councils) would control their own education. "Necessary" accountability in these two situations might be identified as follows:

(i) DIAND Controlling the Programs

- a) the Government should be accountable to the Indian people to provide quality education to their children
- b) DIAND should be accountable to the people (Government) of Canada to ensure that resources are used effectively and efficiently to deliver education to the Indians
- c) DIAND field Education staff should be accountable to senior management in the matter of conducting operations, carrying out policies, and achieving objectives, as defined by the senior group in respect to delivery of education to the Indian people
- d) Provincial School Boards should be accountable to DIAND, via tuition agreements, for delivering an acceptable quality of education to Indian students (and therefore to the Indian community).

(ii) <u>Indians Controlling the Program</u>

- a) the Band Chief and Council should be accountable to the community, to ensure that the best possible education, within the limits of available resources, is provided
- b) the Band should be accountable to the Government of Canada (via DIAND) to use resources in a manner consistent with their stated purpose, i.e., provide education to their people
- c) the Government of Canada should be accountable to the Indian people in the matter of providing them with resources with which to acquire the desired level of education
- d) DIAND should be accountable to the people of Canada (Government) in the matter of ensuring that public funds are protected, and used in the manner prescribed by Parliamentary vote
- e) Provincial School Boards should be accountable to the Indian community for delivering an acceptable quality of education to Indian students.

It is evident that not all of these can be totally valid. For example, the accountability of the Government of Canada (1(a) and 2(c)) may appear both desirable to the Indians and appropriate to the Government (as recommended in other sections of this report); but the element of redress (corrective action) being available to the Indians in case of failure to perform is difficult to visualize. There is no regular process or procedure available to the Indian people by which they can ensure that the Government does in fact live up to these levels of accountability. They can and do use a political process to exert pressures in some instances, and they do have access to a legal process in some cases. Neither of these should be seen as viable alternatives to an agreed accountability relationship. Such an agreed relationship may well be based on the "Ministerial trust" which is seen by the Indian people to be inherent in the Treaties and which would rely on whatever protections may be inherent in that "trust" relationship.

The other areas of accountability listed would all appear to be feasible and desirable and therefore acceptable as guidelines to management. It is important to note that these requirements are essential components of the management process, and are in fact inherent requirements of the six reasons for management control which are the basis of this study.

Observations

In addressing the question of how well the desired areas of accountability are being responded to at present, it is necessary to follow the full management cycle (the control loop) which includes the establishment of standards, or objectives, or criteria. If someone is made accountable to someone else for specific acts or achievements, then he must be given specific instructions (guidelines) by the person to whom he is accountable.

In the actual case of Indian education in the Saskatchewan region, it is evident from the observations presented in this report that accountability is not clearly identified in the Department, largely because of the organization relationships which permit accountability to be progressively sidestepped and transferred upwards until it reaches Parliament (see Exhibit IV), or successfully avoided because disciplinary measures are difficult to apply.

Observations from this report which are relevant to the stated areas of accountability are as follows:

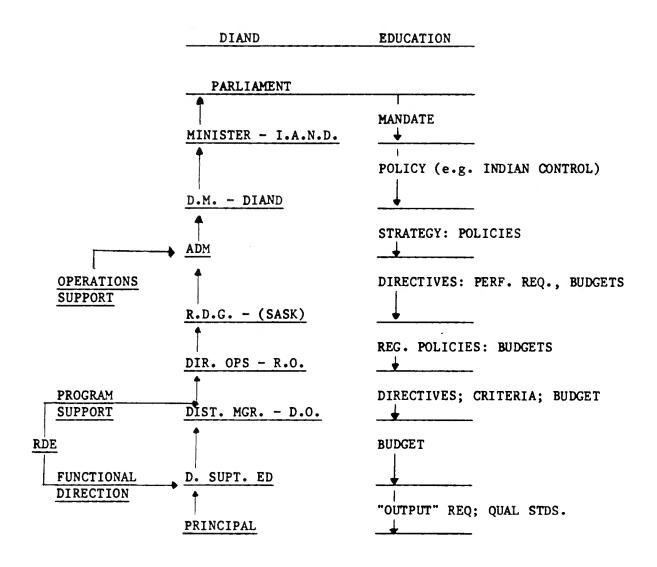
l(a) Quality of Education

- the Department of Indian Affairs, Saskatchewan Region, will spend approximately \$44,000,000 (O&M plus capital) for Indian Education this year, but has no formal information system to determine whether or not the quality of that education is acceptable to the Indian people (Page 24)

1(b) Effective and Efficient use of Resources

- teachers, hired by the Department for work in Federally operated schools have almost no orientation instructions, which may impair their effectiveness to an unacceptable level (Page 30)
- the frustration and possibly the lack of feeling of accomplishment on the part of most District Superintendents of Education is having an adverse effect on the accomplishment of Departmental Educational Programs (Page 37)
- although more than \$37,000,000 (O&M) will be spent this year on education for the Indian people in Saskatchewan, it is almost impossible to relate expenditures to program performance (Page 38)
- the lack of clearly defined responsibility for school dayto-day maintenance problems has resulted in Education personnel carrying out these duties at the expense of their primary responsibilities (Page 44)

PROGRESSIVE LEVELS OF ACCOUNTABILITY



1(c) Education field staff accountable to senior management

- although Indian Control of Indian Education was announced as Government Policy in 1973, most of the job descriptions of Education staff do not indicate any responsibility or task relating to the policy (Page 14)
- the organization structure in the Region is a major factor in reducing the effectiveness of the Education program (Page 31)

1(d) Provincial Schools accountable to DIAND

- more than 50% of the Indian school children attend Provincial schools, but little control is exercised by the Department to ensure satisfactory results in terms of the quality of their education (Page 27)

It goes without saying that where policies are clearly stated by senior management, then subordinates cannot be held accountable if instructions are not clear or if the same senior levels of management impose constraints which effectively inhibit such policies. For example:

- "Effective implementation of Indian Control of Education" is included as a program thrust in the Saskatchewan Region Action Plan for 79/80 but cannot be successful under present constraints (Page 12)
- the pattern of Indian community development, under the influence of Department administration, has resulted in a lack of training and experience needed to support the management of the Education Program (Page 15)
- there is no apparent rationale in the budget or management process by which manpower resources are allocated to and within the programs (Page 40)

In conclusion, accountability is a concept and relates back to the concept dealt with in the summary section of this report (page (i)). Unless there is a commitment on the part of the whole organization, articulated by the senior managers and communicated to all levels, then there is little likelihood that accountability at any level will be treated seriously.

Recommendation

For effective management of any given organization or program, it is essential that the question of accountability be resolved between various members of the organization, and between various parties to formal (and informal) agreements. This may be particularly relevant for District personnel who are faced on a daily basis with attempting, within the bureaucratic structure, to meet Indian needs and aspirations.

It is important also that those who demand accountability from others recognize their own responsibility to provide clear instructions (criteria, standards, objectives, etc.) against which that accountability can be assessed. There is then a further requirement in that valid and accurate information must be collected and analysed to provide the basis for that assessment. Finally, there must be some sanctions (redress, corrective action) which can be exercised if the required accountability is not fulfilled.

These principles are the essence of good management, and therefore can be applied at any level in any business relationship. These recommendations, however, are limited to the major relationships between the Department, the Indian people, and the Provincial government, but should not be construed as being all inclusive or exhaustive.

It is recommended that:

- accountability relationships be clearly established, and the nature of sanctions be identifed; for example:
 - DIAND to the Indian Bands and Indian Band Governments
 - Indian Band Governments to DIAND
 - Indian Band Governments to their communities
 - DIAND to the Government of Canada
 - Provincial Schools to the Indian Bands

all of these being in the context of Indian Control of Indian Education; and that this information be passed on to all concerned, both internal and external to the Department.

Note:

During the interim period, while the Department continues to control the program and operate schools, the following would apply:

- DIAND to the Indian Bands and to Indian Band Governments
- DIAND to the Government of Canada
- Provincial Schools to DIAND
- Other Departments (e.g., PWC) to DIAND

As these are developed and documented, it will be found that accountability relationships between the various levels of the DIAND hierarchy will fall naturally into place.