



## ***Theodore Roosevelt School***

### ***Warriors***

*P.O. Box 567*

*Fort Apache, AZ 85926*

*(928) 338-4464 Fax (928) 338-1009*

***Dr. Leon Ben, Chief School Administrator / Principal***

March 21, 2025

Honorable Tony Dearman  
Director, Bureau of Indian Education  
1849 C Street NW, MS 3609  
Washington DC, 20240

*submitted electronically: [consultationcomments@bie.edu](mailto:consultationcomments@bie.edu)*

RE: BIE Implementation of Executive Order 14191

Dear Director Dearman:

I provide these comments on behalf of Theodore Roosevelt School regarding the February 28, 2025, notification to tribes and stakeholders about Executive Order 14191, and as discussed in the March 14 webinar session.

Executive Order 14191 directs the Secretary of the Interior to explore mechanisms to extend Bureau of Indian Education funding to education opportunities outside the current BIE funded system. The directive states it is intended to expand family choice for BIE eligible students by allocating funds to other education settings the student's family may select. Although no specific details about this idea were provided to us, we are deeply concerned about its potential impact on Theodore Roosevelt School—a tribally controlled and BIE-funded school of the White Mountain Apache Tribe.

We first note there is a misunderstanding about the term “choice” in the Executive Order. Our students are not required to attend Theodore Roosevelt School or any other BIE-funded school. A family may choose to have their child attend one of the three BIE-funded schools in our reservation, one of the schools operated by the local state school district in our reservation, or a private parochial school. Each school is available to families within our Tribal lands, and each draws from its own funding source for the students it serves. Given the remote location of our lands, the establishment of other independent or private schools is not feasible. A new plan of vouchers for BIE eligible students would not change this reality.

We welcome the incentive that the range of choices provides, as we know we must provide quality education to attract and retain students in our school. And, we believe we offer something that cannot be found elsewhere. Theodore Roosevelt School began operations in 1923 in historic Fort Apache where it remains today, and has been a unique and vital educational home for generations of Native American students. The school currently serves 150 students, with approximately 40 of those students living in the school dormitory. The residential program offers a stable environment with new bedding, continuous security, enriching recreational activities, and robust academic interventions. Many of our students qualify under the McKinney-Vento Act, coming from families who struggle with poverty and food insecurity. At our school, all students receive consistent, nutritious meals and care—often their only reliable source of sustenance. A voucher program could not provide these benefits to our students.

Thus, Theodore Roosevelt School is not just a school—it is a critical sanctuary and essential lifeline for Native American children facing great hardship. It is a powerful shield protecting children who are from communities with severely limited access to fundamental services such as water, sewer, heating, internet, and even drivable roads. Although our school is operated on a smaller budget, as compared to state-wide and national averages, we have demonstrated significant improvements in student outcomes with programs that are rooted in the values that sustain our tribe. Theodore Roosevelt School integrates faith, family, and cultural values into daily student life. Traditional practices, nutritious indigenous foods, and community prayer instill pride and healthy lifestyles, fostering a strong sense of identity and belonging.

We are greatly concerned that these successes would be undone by the attempt to implement a voucher plan. There is no authority in current law for a voucher system of the nature and scope suggested in Executive Order 14191. We believe the attempt to insert a voucher plan into Indian education would only come at the expense of the limited current funding, drawing away BIE funds from our school, to be used for unknown and unaccountable uses. This would reduce our funding and causing serious disruption to the education of our children. It could also lead to exploitation of voucher holders with the money being diverted to other outside interests that do not have awareness or respect for our educational interests and values.

We note that although BIE's outreach to tribes uses the term "consultation" about this matter, there is nothing in this exchange that constitutes a consultation, as that term is defined by statute or BIA policy. There is no specific plan, no word about how the proposal would affect BIE services, no proposed budget, and certainly no indication how this proposal could become effective for the upcoming 2025/26 school year, as Executive Order 14191 directs. Although we welcome dialogue about improving Indian education, we caution it would seriously misrepresent our preliminary dialogue to suggest the BIE conducted consultation about this issue.

Theodore Roosevelt School welcomes the opportunity to collaborate on improvements we can collectively bring to Indian education. We urge that if there should be a plan to enhance education choice in tribal communities, it must be designed and implemented through appropriate BIE collaboration at the local level with each tribal government and each BIE school. Above all, the implementation of Executive Order 14191 must avoid a reoccurrence of past harms that resulted from abrupt and ill-considered shifts in federal and education policy. For that reason, we need thoughtful and thorough consultation conducted in the spirit of the federal law to clearly identify the education needs in our communities and to identify how the tribal schools and the Bureau of Indian Education can best respond.

We look forward to working with your office for that purpose.

Sincerely



Lorene Billy  
School Board President

cc: Hon. Kasey Velasquez, Chairman, White Mountain Apache Tribe  
Members of the Tribal Council, White Mountain Apache Tribe  
School Board Members, Theodore Roosevelt School



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## **THEODORE ROOSEVELT SCHOOL GOVERNING BOARD RESOLUTION**

WHEREAS, Theodore Roosevelt School (TRS) is a Tribally Controlled School, governed under the authority vested in the Governing Board by the White Mountain Apache Tribe, exercising its inherent sovereignty recognized by treaties, federal statutes, and affirmed by the United States Supreme Court; and

WHEREAS, Theodore Roosevelt School was established in **1923** and has continuously provided educational services for over **102 years**; and

WHEREAS, Theodore Roosevelt School remains dedicated to fostering a supportive learning environment that empowers Indigenous students to excel academically and prepare for future success

WHEREAS, TRS provides critical educational services to approximately 150 Native American students who face significant barriers, including severe infrastructural limitations—lack of basic utilities, inadequate transportation, poverty, and food insecurity—in direct alignment with the mandates outlined under the McKinney-Vento Homeless Assistance Act (42 U.S.C. §11431 et seq.); and

WHEREAS, TRS operates essential residential programs, providing a safe, secure environment, nutritious meals, academic interventions, and cultural education, significantly reducing risks associated with extreme poverty and food insecurity as experienced by many enrolled students; and

WHEREAS, TRS consistently maintains an exemplary attendance rate exceeding 90%, affirming the efficacy of locally controlled education, aligned with the Executive Order on Educational Freedom and Opportunity, which prioritizes direct funding to educational services rather than bureaucratic administration; and

WHEREAS, TRS actively develops the future leadership and skilled workforce necessary for the economic growth and stability of the White Mountain Apache Tribe, the State of Arizona, and the broader national economy, instilling values of accountability, merit, self-reliance, and personal responsibility; and

WHEREAS, TRS currently serves approximately 150 students, averaging 25 students per classroom, maintaining operational obligations to provide highly qualified certified teachers, facility maintenance, utilities, and comprehensive student support regardless of fluctuations in enrollment; and

WHEREAS, TRS currently maintains a waiting list of students and families eager to enroll, including applicants from other tribal communities, but lacks sufficient infrastructure to expand and accommodate increased demand, thereby limiting opportunities for these students to benefit from TRS's comprehensive educational services; and

WHEREAS, TRS has learned of a plan to allocate federal funds for a voucher system for Indian Education, which could potentially diminish the limited funding that is available.

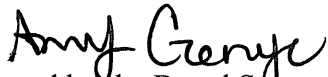
NOW, THEREFORE, BE IT RESOLVED, that the Governing Board of Theodore Roosevelt School formally declares and affirms that:

1. Continued full federal funding for Theodore Roosevelt School and other Tribally Controlled Schools is essential to ensure the protection, education, and welfare of Native American students.
2. It opposes any effort to diminish school funding through the use of vouchers or other plans to divert school funding to any other use apart from the support of Theodore Roosevelt School
3. TRS shall serve as a national model of excellence for tribally managed education, promoting responsibility, accountability, merit-based outcomes, and culturally relevant education aligned with constitutional principles and tribal sovereignty.
4. It is imperative that the Federal Oversight Committee recognize and actively support TRS's unique ability to deliver measurable results aligned with federal goals outlined in the Executive Order on Educational Freedom and Opportunity.
5. Policies shall be supported and enacted that empower Native American families and communities to pursue educational pathways reflecting their cultural values, heritage, and self-determined priorities, reinforcing principles of tribal sovereignty and self-governance.
6. Immediate support and investment are required to expand TRS's facilities and infrastructure, enabling the accommodation of additional students currently on waiting lists, thereby ensuring their safety, educational success, and access to necessary services that state-run facilities have failed to adequately provide.
7. Theodore Roosevelt School continues to honor its legacy and commitment to serving the educational needs of the White Mountain Apache Tribe and other Native American students for generations to come.

ADOPTED and APPROVED by the Governing Board of Theodore Roosevelt School on this 19th day of March, 2025.



President Theodore Roosevelt School Board



Attested by the Board Secretary



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## **Empowering Native Futures: Sustaining Tribally Controlled Schools to Advance Educational Freedom, Opportunity, and Community Growth**

*It is the mission of the Theodore Roosevelt School to prepare and empower all students for the choices and challenges they will face in the future by providing a positive, healthy, social and educational environment which is based on Ndee knowledge and language.*

Theodore Roosevelt School (TRS) is not just a school—it is a critical sanctuary, a beacon of hope, and an essential lifeline for Native American children facing unimaginable hardships. It is a powerful shield protecting children from communities with severely limited access to fundamental services such as water, sewer, heating, internet, and even drivable roads. For many students, attending the nearest city school—often one to three hours away—is simply impossible, especially since these city schools have eliminated transportation services for reservation students. TRS currently faces a waiting list filled with families desperate to enroll their children, including students from distant tribal communities' hours away. Our limited resources force us to turn away children who cry and plead to remain with us over weekends rather than return to their difficult home conditions.

TRS's residential program offers students a stable, secure environment with new bedding, dependable heating and cooling systems, continuous security, enriching recreational activities, and robust academic interventions. Many of our students qualify under the McKinney-Vento Act, struggling daily with extreme poverty and food insecurity. At TRS, these students receive consistent, nutritious meals and care—often their only reliable source of sustenance.

**The Tragic Cost of State-Run Facilities** The heartbreaking stories of 1000's other Native children in Arizona who similarly disappeared, underscores a devastating reality: state-run facilities are not equipped to protect Native American children from being targeted, marginalized, and tragically harmed. TRS provides a necessary alternative—a safe haven, deeply embedded in and committed to protecting the community it serves.

**Outstanding Attendance and Proven Success** TRS consistently achieves attendance rates over 90%, demonstrating our ability to provide a structured, nurturing environment conducive to consistent learning and growth. Our success directly aligns with the Executive Order on Educational Freedom and Opportunity, proving that local control and strategic investments yield genuine, measurable outcomes.

**Financial Reality and the Need for Sustainable Growth** Currently, TRS serves approximately 150 students with average class sizes of 25 students each. Whether a classroom has 5 students or 25, TRS must still employ highly qualified and certified teachers, cover utilities, and maintain safe, reliable facilities. Any reduction or loss of funding would not only cripple our operational capabilities but irreversibly dismantle the remarkable achievements and essential services we provide. We urgently need your support—not only to sustain existing programs but also to strategically expand our facilities, allowing us to grow our enrollment and effectively serve more families and students currently awaiting access.

To achieve fiscal parity with non-rural schools within Arizona, TRS would require per-student funding of approximately \$11,770—a funding gap of \$4,270 per student. When benchmarked against the national average, our school would necessitate funding of approximately \$17,505 per student, presenting an even more substantial deficit of \$10,005 per student.

Despite these significant financial disparities, TRS consistently demonstrates academic excellence, operational efficiency, cultural integrity, and fiscal responsibility. Continued and enhanced funding of Theodore Roosevelt School promises exceptional returns on investment (ROI). Specifically, aligning funding to the Arizona state average represents an additional investment of \$640,500 annually, while alignment with the national average equates to an additional investment of \$1,500,750 annually.

Investing in Tomorrow's Leaders Supporting TRS is not merely about preserving a school—it is about cultivating the future strength and economic vitality of the White Mountain Apache Tribe, Arizona, and America. TRS actively fosters personal responsibility, discipline, resilience, and a powerful work ethic. Our students graduate as:

- Dynamic contributors equipped to thrive in a competitive global economy.
- Visionary leaders poised to guide and uplift the White Mountain Apache Tribe.
- Skilled workforce participants who strengthen the region's economic stability.

A Strong Partnership in Achieving Educational Goals the Executive Order on Educational Freedom and Opportunity emphasizes directing resources straight to students—not bureaucracy. TRS exemplifies this goal by directly investing in student success, maintaining fiscal responsibility, and ensuring measurable outcomes through rigorous accountability, structured governance, and targeted educational programs.

Faith, Family, and Cultural Heritage TRS deeply integrates faith, family, and cultural values into daily student life. Traditional practices, nutritious indigenous foods, and community prayer instill pride and healthy lifestyles, fostering a strong sense of identity and belonging.

Historic and Strategic Location Located at the historic Fort Apache site, TRS connects students with their rich ancestral heritage, promoting cultural pride and academic achievement. Proximity to vital healthcare and emergency services ensures comprehensive support for students.

Empowering Tribal Leadership and Local Governance Investment in TRS directly strengthens tribal sovereignty and local leadership. With a predominantly Native American staff, TRS provides mentorship, affirmation of cultural identity, and promotes accountability and success.

Position Statement from the Theodore Roosevelt School Board the Theodore Roosevelt School Board respectfully requests that the Federal Oversight Committee:

- Continue full funding for Theodore Roosevelt School and other Tribally Controlled Schools.
- Recognize TRS as a vital model of responsible, accountable, and locally controlled education.
- Actively support policies and initiatives that enable TRS to expand enrollment and infrastructure, empowering us to serve more students and families.

We submit this position as a compelling and urgent call for continued investment in TRS—a proven model for achieving measurable, impactful educational excellence. With your support, TRS will not only sustain but expand its critical role, producing capable, responsible, and empowered citizens ready to contribute meaningfully to our nation's workforce and global economy.



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## **Theodore Roosevelt School: Key Highlights**

Theodore Roosevelt School (TRS), a tribally controlled institution governed by the White Mountain Apache Tribe, fulfills critical federal trust responsibilities defined under the Indian Self-Determination and Education Assistance Act (ISDEAA, Public Law 93-638; 25 U.S.C. §§5301 et seq.) and the Executive Order establishing the Fort Apache Reservation (1871).

### Key Highlights:

#### Accreditation & Excellence:

- Cognia Accredited
- Certified Continuous School Improvement Plan (1-Plan)
- Exemplary Special Education Audit
- Completed 2023/2024 Physical Financial Audit

#### Security & Staffing:

- Fully staffed with certified, qualified personnel
- 3 Certified Tribal Adjudication Professionals
- 41 Staff and Board Members cleared by Public Law 101-630 (1990); 25 U.S.C. §§ 3201–3211
- Native American administrative leadership team
- Over 50% Native American teachers and support staff

#### Academic Achievements:

- Consistently increasing student academic performance
- Integrated HMH curriculum implementation
- Robust STEM and Robotics Programs
- High demand and extensive waiting list for student enrollment
- Attendance consistently over 90%

#### Financial Strength:

- Sustainable and balanced budget
- Expenditures strategically aligned with school objectives
- Operational per-student funding (\$7,500), significantly lower than Arizona (\$10,000) and national (~\$15,000) averages
- Operational costs in rural settings are at least 16.7% higher than urban/suburban counterparts
- Funding shortfall: \$4,270 per student (Arizona average), \$10,005 per student (national average)
- Required additional investment for parity: \$640,500 annually (Arizona), \$1,500,750 annually (national)

### Professional Development & Collaboration:

- Professional development aligned with SMART Goals
- Strong partnerships with:
  - White Mountain Apache Tribe
  - Arizona State University
  - University of Arizona
  - Northern Arizona University
  - Northern Pioneer College

### Student Preparation & Community Focus:

- Comprehensive student safety and security measures
- Preparing students for success beyond school, emphasizing workforce readiness
- Promoting cultural heritage, sovereignty, and active community engagement

### Concerns about Executive Order 14191:

- Aims to redistribute BIE funding through vouchers without detailed plans
- Existing school choice already available within tribal lands
- Voucher reallocation risks undermining existing essential programs, integrity, and sustainability
- Loss of culturally responsive educational benefits and potential exploitation by external interests

### Recommendations:

- Preserve and enhance existing educational structures at TRS
- Maintain uninterrupted funding to TRS and similar tribally controlled schools
- Recognize and support TRS as a model for Native American and accountable education
- Support policies enabling expansion of infrastructure and enrollment to serve waiting families
- Engage in genuine consultation per statutory mandates (25 U.S.C. §2011), respecting tribal sovereignty and local priorities

Conclusion: TRS exemplifies a high return on investment by demonstrating exceptional academic results, cultural preservation, and community engagement despite financial constraints. Any policy, including Executive Order 14191, must ensure existing successful educational models like TRS are preserved and strengthened through genuine collaboration and consultation.