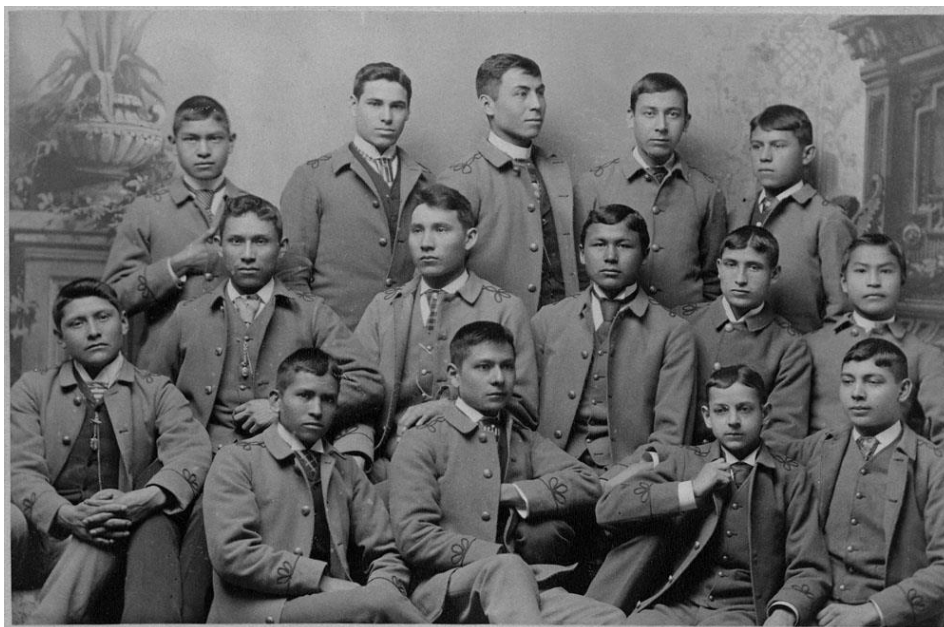


The Use of Native Boarding Schools as a Form of Genocide in the United States

Sasha Elliott



Male Students at Carlisle Indian Industrial School, Pennsylvania, c. 1896

Introduction

From the time Christopher Columbus arrived in present-day America, Native Americans have been confronted with conflict, violence, and near-extirpation in the ongoing battle to keep their land.¹ Beginning in the early 19th century, as colonizers sought to expand westward, Natives were forced off their land. Tribes such as the Creeks ceded as much as 22 million acres of land to the United States government through treaties, but only after being defeated by the United States military.² Treaties, while technically an agreement between the tribes and the federal government, were signed by tribes—specifically the Creek, Cherokee, Chickasaw, and Choctaw—only in an attempt to appease the government.³ The tribes' hope was that by signing these treaties, they would be able to retain at least some of their land in exchange for what was being taken from them.⁴

In 1819, Congress enacted the Civilization Fund Act.⁵ The fund paid missionaries and church leaders to partner with the federal government to establish schools in Indian territories to

¹ <https://www.history.com/topics/native-american-history/native-american-timeline>. "Native American History Timeline." History.com Editors. A&E Television Networks, 27 November 2018.

² <https://history.state.gov/milestones/1830-1860/indian-treaties>. "Indian Treaties and the Removal Act of 1830." U.S. Department of State.

³ *Ibid.*

⁴ *Ibid.*

⁵ <https://calendar.eji.org/racial-injustice/mar/03>. "Congress Creates Fund to 'Civilize' Native American People. Equal Justice Initiative.

teach Native children to replace tribal practices with Christian practices.⁶ Using the fund, 52 schools were established within the next decade and were administered either by the federal government or Christian missions.⁷ Fourteen Christian denominations ran 146 Indian boarding schools, with the Catholic church in charge of 80 boarding schools.⁸ The federal government established the Bureau of Indian Affairs in 1824 to “oversee the fund and implement programs to ‘civilize’ the Native people.”⁹ The United States Government continued to provide funding to these schools until 1969.¹⁰

In 1830, President Andrew Jackson signed the Indian Removal Act, which allowed the government to give Native American tribes land west of the Mississippi River in exchange for their homeland.¹¹ “With the Act in place, Jackson and his followers were free to persuade, bribe, and threaten tribes into signing removal treaties and leaving the Southeast.”¹² Nearly 50,000 eastern Natives relocated to the designated Indian Territory.¹³ Those who fought to retain their homelands, mostly Cherokees, after the Indian Removal Act became law were forcibly removed from their land by the government.¹⁴ Natives were then forced to walk what is now known as the Trail of Tears, a 1,000-mile march to Indian Territory, for which there were very few supplies.¹⁵ At least 4,000 Cherokee lives were lost along the Trail of Tears as a result of cold, hunger, and disease.¹⁶

The United States government’s attack on Native bodies, culture, and way of life did not end with the Trail of Tears. This condensed history, however, serves to illustrate the United States’ desire to remove what they saw as an obstacle to “manifest destiny,” their God-given right “to expand its dominion and spread democracy and capitalism across the entire North American continent.”¹⁷ “At the heart of manifest destiny was the pervasive belief in American cultural and racial superiority.”¹⁸ This history of violence and manifest destiny is necessary in

⁶ *Ibid.*

⁷ <https://nativephilanthropy.candid.org/events/u-s-pays-missionaries-to-civilize-native-americans/>. “U.S. Pays Missionaries to ‘Civilize’ Native Americans.” Native Americans in Philanthropy.

⁸ <http://www.mnchurches.org/blog/2021/02/8/indigenous-organization-seeks-church-partners-truth-telling-healing-around-indian>. Minnesota Council of Churches.

⁹ <https://calendar.eji.org/racial-injustice/mar/03>. “Congress Creates Fund to ‘Civilize’ Native American People. Equal Justice Initiative.

¹⁰ <https://www.americamagazine.org/politics-society/2021/06/30/native-american-boarding-schools-catholic-church-investigation-240950>. “The Catholic Church must come clean—completely—about what it did to Native Americans.” The Editors. America Magazine. 30 June 2021.

¹¹ <https://history.state.gov/milestones/1830-1860/indian-treaties>. “Indian Treaties and the Removal Act of 1830.” U.S. Department of State.

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ <https://www.loc.gov/classroom-materials/immigration/native-american/removing-native-americans-from-their-land/>. “Removing Native Americans from their Land.” The Library of Congress.

¹⁵ *Ibid.*

¹⁶ <https://www.pbs.org/wgbh/aia/part4/4p2959.html>. “Indian Removal.” PBS.

¹⁷ <https://www.history.com/topics/westward-expansion/manifest-destiny>. “Manifest Destiny.” History.com Editors. A&E Television Networks, 15 November 2019.

¹⁸ <https://www.ushistory.org/us/29.asp>. “Manifest Destiny.” ushistory.org. U.S. History Online Textbook.

understanding that boarding schools were undoubtedly used by the government as a form of genocide against Native Americans.

Boarding School History

The first United States boarding school, located on the Yakima Indian Reservation in Washington state, was established in 1860.¹⁹ On-reservation schools like this were met with less opposition from Native parents than off-reservation schools.²⁰ Both the U.S. government and churches undertook the operation of the schools.²¹ ²² In 1879, the first federally run, off-reservation boarding school, the Carlisle Industrial Indian School, was established in an effort to further remove Native children from tribal life and influence.²³ ²⁴ The Carlisle School was founded by Army officer Richard Pratt.²⁵ Pratt, who was an advocate for “Americanization” and assimilation, famously coined the phrase “kill the Indian and save the man.”²⁶ The school became a national model based on Pratt’s philosophy.²⁷



Richard Henry Pratt, Founder of Carlisle Indian School

¹⁹ <https://www.theindigenousfoundation.org/articles/us-residential-schools>. “The U.S. History of Native American Boarding Schools.” Melissa Mejia. The Indigenous Foundation. 18 July 2021.

²⁰ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

²¹ <https://boardingschoolhealing.org/education/us-indian-boarding-school-history/>. “US Indian Boarding School History.” The National Native American Boarding School Healing Coalition.

²² <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

²³ <https://www.nlm.nih.gov/nativevoices/timeline/357.html>. “First Off-Reservation Boarding School for Native Children Opens.” U.S. National Library of Medicine.

²⁴ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

²⁵ <https://www.pbs.org/wgbh/roadshow/stories/articles/2020/4/13/early-years-american-indian-boarding-schools>. “Understanding the Origin of American Indian Boarding Schools.” Sarah K. Elliott. 13 April 2020.

²⁶ <https://www.nlm.nih.gov/nativevoices/timeline/357.html>. “First Off-Reservation Boarding School for Native Children Opens.” U.S. National Library of Medicine.

²⁷ <https://eji.org/news/history-racial-injustice-cultural-genocide/>. “‘Cultural Genocide’ and Native American Children.” Equal Justice Initiative. 1 September 2014.

The government made attendance at boarding schools mandatory.²⁸ If parents resisted sending their children to boarding school, the parents were imprisoned, and their children were taken from them.²⁹ Often, children were forcibly abducted from their homes to attend boarding schools.³⁰ Later, Native families chose to send their children to boarding schools after being left with no other options for education.³¹

Approximately 400 boarding schools were established between 1880 and 1902.³² By 1909, the number of schools neared 500, and this included both on- and off-reservation boarding schools as well as day schools.³³ “During the late 19th century, boarding schools were promoted as a solution to what was called the ‘Indian problem.’”³⁴ By 1925, there were over 61,000 children in boarding schools, fully 83% of Native school-age children.³⁵ The United States government still operates some off-reservation boarding schools today.³⁶

The goal of these schools was to assimilate Indians to the “American” way of life. “Indian people would be taught the importance of private property, material wealth, and monogamous nuclear families.”³⁷ They were indoctrinated with Christianity to replace their traditional religious practices.³⁸ ³⁹ They were forced to learn principles of democratic society.⁴⁰ The environment of boarding schools was regimented to instill in the children the values of white society such as order, discipline, and self-restraint.⁴¹ Children were individualized.⁴² Training

²⁸ <https://www.theindigenousfoundation.org/articles/us-residential-schools>. “The U.S. History of Native American Boarding Schools.” Melissa Mejia. The Indigenous Foundation. 18 July 2021.

²⁹ <https://eji.org/news/history-racial-injustice-cultural-genocide/>. “‘Cultural Genocide’ and Native American Children.” Equal Justice Initiative. 1 September 2014.

³⁰ <https://www.narf.org/cases/boarding-school-healing/>. “Boarding School Healing.” Native American Rights Fund. 1 July 2021.

³¹ <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

³² <https://eji.org/news/history-racial-injustice-cultural-genocide/>. “‘Cultural Genocide’ and Native American Children.” Equal Justice Initiative. 1 September 2014.

³³ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. “Indigenous Peoples and Boarding Schools: A comparative study.” Andrea Smith. United Nations. p 4, *citing* “Education for Extinction.” David Wallace Adams. 1995. University of Nebraska Press.

³⁴ https://www.oregonencyclopedia.org/articles/indian_boarding_school/#.Ya5FHvHMI4g. “Indian Boarding Schools.” Cary Collins. 8 January 2021.

³⁵ <https://boardingschoolhealing.org/education/us-indian-boarding-school-history/>. “US Indian Boarding School History.” The National Native American Boarding School Healing Coalition.

³⁶ <https://www.theindigenousfoundation.org/articles/us-residential-schools>. “The U.S. History of Native American Boarding Schools.” Melissa Mejia. The Indigenous Foundation. 18 July 2021.

³⁷ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

³⁸ *Ibid.*

³⁹ <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

⁴⁰ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

⁴¹ *Ibid.*

⁴² *Ibid.*

focused on economic self-reliance through teachings of possessive individualism.⁴³ “This opposed the basic Indian belief of communal ownership, which held that the land was for all people.”⁴⁴ In other words, the goal was to force capitalistic goals inherent in manifest destiny onto Natives, values which were directly contradictory to Native ones.

To achieve these goals, boarding schools removed children from their Native families and culture for extended periods of time.⁴⁵ Upon arrival, children’s hair was cut.⁴⁶ In Native culture, hair is considered sacred and significant.⁴⁷ Children were forced to give up traditional clothing, and instead they had to wear standard uniforms.^{48 49} Children were stripped of their Native names and had to choose English names instead.⁵⁰ Luther Standing Bear, a prominent Native author, educator, and actor, wrote of the experience:

“Almost immediately our names were changed to those in common use in the English language. Instead of translating our names into English and calling Zinkcaziwin, Yellow Bird, and Wanbli K’leska, Spotted Eagle, which in itself would have been educational, we were just John, Henry, or Maggie, as the case might be. I was told to take a pointer and select a name for myself from the list written on the black board. I did, and since one was just as good as another, and as I could not distinguish any difference in them, I placed the pointer on the name Luther. I then learned to call myself by that name and got used to hearing others call me by it, too.⁵¹”

While at boarding school, children were not allowed to speak their native language.⁵² If they were caught speaking a Native language, they were punished harshly.⁵³ “They were taught that their cultures were inferior. Some teachers ridiculed and made fun of the students’ traditions. These lessons humiliated the students and taught them to be ashamed of being American Indian. The boarding schools had a negative effect on the self-esteem of Indian students and on

⁴³ *Ibid.*

⁴⁴ *Ibid.*

⁴⁵ <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

⁴⁶ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

⁴⁷ <https://sistersky.com/blogs/sister-sky/the-significance-of-hair-in-native-american-culture>. “The Significance of Hair in Native American Culture.” Barbie Stensgar. Sister Sky. 4 January 2019.

⁴⁸ <https://boardingschoolhealing.org/education/us-indian-boarding-school-history/>. “US Indian Boarding School History.” The National Native American Boarding School Healing Coalition.

⁴⁹ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid.

⁵⁰ <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

⁵¹ “Land of the Spotted Eagle.” Luther Standing Bear. Bison Books. pp. 459-460.

⁵² <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

⁵³ <https://www.theindigenousfoundation.org/articles/us-residential-schools>. “The U.S. History of Native American Boarding Schools.” Melissa Mejia. The Indigenous Foundation. 18 July 2021.

the well-being of Native languages and cultures.”⁵⁴ Punishment included confinement, deprivation of privileges, threat of corporal punishment, or diet restrictions.⁵⁵ ⁵⁶ Children were also neglected and physically and sexually abused by school officials.⁵⁷

In 1928, the Interior Department commissioned an investigative report. This report condemned the conditions of the schools, “citing insufficient food, overcrowded dorms, substandard medical care, and exploitative child labor practices.”⁵⁸ However, nothing changed.

Legal Elements of the Crime of Genocide

The Convention on the Prevention and Punishment of the Crime of Genocide provides the elements required to prove genocide. It was adopted into United States Code in 1988.⁵⁹ This definition requires a showing of *dolus specialis*, which is the “special intent” requirement, and a showing of the underlying crime. For the *dolus specialis*, four elements must be proven:

- (1) Intent to destroy
- (2) In whole or in part
- (3) A national, ethnical, racial, or religious group
- (4) As such

To meet the element of the underlying crime, it must be proven that one or more of the following acts was undertaken by the perpetrator(s):

- (a) Killing members of the group;
- (b) Causing serious bodily or mental harm to members of the group;
- (c) Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part;
- (d) Imposing measures intended to prevent births within the group; or
- (e) Forcibly transferring children of the group to another group.⁶⁰

Intent to Destroy

The International Criminal Tribunal of the former Yugoslavia (ICTY) further clarified the requirements outlined by the Genocide Convention. For the requirement of intent to destroy, the Trial Chamber at ICTY held that the “specific intent must be to destroy the group as a separate and distinct entity.”⁶¹ The Trial Chamber also held that the goal of the operation does

⁵⁴ <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

⁵⁵ <http://worldwithoutgenocide.org/genocides-and-conflicts/american-indian/indian-boarding-schools/>. “Assimilation through Indian Boarding Schools.” Amanda McAllister and Taylor Krawczewski.

⁵⁶ <https://www.theindigenousfoundation.org/articles/us-residential-schools/>. “The U.S. History of Native American Boarding Schools.” Melissa Mejia. The Indigenous Foundation. 18 July 2021.

⁵⁷ ⁵⁷ <http://worldwithoutgenocide.org/genocides-and-conflicts/american-indian/indian-boarding-schools/>. “Assimilation through Indian Boarding Schools.” Amanda McAllister and Taylor Krawczewski.

⁵⁸ <https://eji.org/news/history-racial-injustice-cultural-genocide/>. “‘Cultural Genocide’ and Native American Children.” Equal Justice Initiative. 1 September 2014.

⁵⁹ 18 U.S. Code § 1091.

⁶⁰ <https://www.refworld.org/docid/3ae6b3ac0.html>. UN General Assembly, *Convention on the Prevention and Punishment of the Crime of Genocide*, 9 December 1948, United Nations, Treaty Series, vol. 78, p. 277.

⁶¹ *Prosecutor v. Blagojević*, Case No. IT-02-06, Judgment, ¶ 670

not have to be destruction initially; destruction may become the goal through the course of the operation.⁶² Knowledge that action may result or likely would result in destruction is not enough to satisfy the intent requirement. The goal must be destruction.⁶³ Because special intent is all that is required, actual destruction, in whole or in part, is not necessary to satisfy the statute. It can, however, be evidence of the intent to destroy.⁶⁴ There does not need to be evidence of a plan or policy of destruction, but, again, it can be evidence of the intent to destroy.⁶⁵ Special intent may be inferred.⁶⁶ Factors such as “the general context, the perpetration of other culpable acts systematically directed against the same group, the scale of atrocities committed, the systematic targeting of victims on account of their membership of a particular group, or the repetition of destructive and discriminatory acts” may be considered when inferring genocidal intent.⁶⁷

Physical or Biological Destruction

The Appeals Chamber of ICTY has held that destruction of a group must be physical or biological. Generally, attacking cultural characteristics will not satisfy the requirement of destruction.⁶⁸ However, the Trial Chamber in a different case had a conflicting holding, where they held:

While the listed acts indeed must take a physical or biological form, the same is not required for the intent. With the exceptions of the acts listed in Article 4(2)(c) and (d), “the Statute itself does not require an intent to cause physical or biological destruction of the group in whole or in part.”⁶⁹

The Trial Chamber continued by quoting the dissent of Appeals Chamber Judge Shahabuddeen, who wrote in opposition of requiring intent to destroy meaning physical or biological destruction. He wrote:

It is the group which is protected. A group is constituted by characteristics—often intangible—binding together a collection of people as a social unit. If those characteristics have been destroyed in pursuance of the intent with which a listed act of a physical or biological nature was done, it is not convincing to say that the destruction, though effectively obliterating the group, is not genocide because the obliteration was not physical or biological . . . [T]he intent certainly has to be to destroy, but, except for the listed act, there is no reason why the destruction must always be physical or biological.⁷⁰

So, while it seems there is slight disagreement on whether destruction must be physical or biological, case law has held firm that methods of destruction chosen by the perpetrator need

⁶² *Prosecutor v. Kistić*, Case No. IT-98-33-T, Judgment, ¶ 572

⁶³ *Blagojević*, Case No. IT-02-06, Judgment, ¶ 656

⁶⁴ *Prosecutor v. Stakić*, Case No. IT-97-24-T, Judgment ¶ 522

⁶⁵ *Jelić*, Case No. IT-95-10-A, Appeals Chamber Judgment ¶ 48

⁶⁶ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 34

⁶⁷ *Jeselić*, Case No. IT-95-10-A, Judgment, ¶ 47

⁶⁸ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 25

⁶⁹ *Blagojević*, Case No. IT-02-60-T, Judgment ¶ 659

⁷⁰ *Kristić*, Case No. IT-98-33-A, Partial Dissenting Opinion of Judge Shahabuddeen ¶¶ 45-54

not be the most efficient available.⁷¹ Acts that do not cause death may be considered destruction.⁷²

Forcible Transfer as a Tool of Destruction

Forcible transfer may be used as evidence of the intent to destroy.⁷³ In determining whether the “Srebrenica massacre” in the former Yugoslavia was genocide, the Appeals Chamber of the ICTY held:

[F]orcible transfer could be an additional means by which to ensure the physical destruction of the Bosnian Muslim community in Srebrenica. The transfer [of the women and children] completed the removal of all Bosnian Muslims from Srebrenica, thereby eliminating even the residual possibility that the Muslim community in the area could reconstitute itself . . .⁷⁴

However, there has been tension between this decision and some trial chamber decisions. In *Prosecutor v. Brđanin*, the Trial Chamber held that intent to destroy could not be satisfied because the number of people forcibly transferred was far higher than the number of people killed.⁷⁵ In *Stakić*, the Trial Chamber held that forcible transfer was not sufficient to show intent to destroy without showing that other methods were used to physically destroy the group.⁷⁶

In Whole or In Part

Next, the Genocide Convention requires, as part of the *dolus specialis*, intent to destroy a group or groups “in whole or in part.” “In whole or in part” refers to the scope of intended destruction; there must be intent to destroy a distinct part of a group, not just individuals within a group.⁷⁷ If the whole group is not targeted for destruction, a “substantial” part must be targeted in order to satisfy the requirement.⁷⁸ The Appeals Chamber in *Kristić* also addressed this, writing, “The aim of the Genocide Convention is to prevent the intentional destruction of entire human groups, and the part targeted must be significant enough to have an impact on the group as a whole.”⁷⁹ They explained further, writing that the “numeric size of the targeted group is a necessary and important starting point . . .,” adding that the number of people targeted should be evaluated in both absolute and comparative terms, and that the targeted portion’s prominence within a group can be considered to determine substantiality.⁸⁰ “If a specific part of the group is emblematic of the overall group, or is essential to its survival, that may support a finding that the part qualifies as substantial within the meaning of Article 4.”⁸¹

⁷¹ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 32

⁷² *Blagojević*, Case No. IT-02-06, Judgment, ¶ 662, citing *Prosecutor v. Akayesu*, Case No. ICTR-96-04, Judgment

⁷³ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 31

⁷⁴ *Ibid.*

⁷⁵ *Prosecutor v. Brđanin*, Case No. IT-99-36-T, ¶ 976

⁷⁶ *Stakić*, Case No. IT-97-24-T, Judgment ¶ 557

⁷⁷ *Brđanin*, Case No. IT-99-36-T, ¶ 700

⁷⁸ *Prosecutor v. Simba*, Case No. ICTR-01-76-T, Judgment, ¶ 412

⁷⁹ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 8

⁸⁰ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 12

⁸¹ *Ibid.*

National, Ethnical, Racial, or Religious Group

Dolus specialis next requires that the intent to destroy is aimed at one of four protected groups—a national, ethnical, racial, or religious group.⁸² Determining whether a group qualifies as protected under one of these four distinctions can be difficult, but one factor that may be useful is the stigmatization of the group by the perpetrators of the crime on the basis of perceived national, ethnical, racial, or religious characteristics.⁸³ A group whose members share the same language and culture have been designated as an ethnic group.⁸⁴

As Such

Finally, *dolus specialis* requires that individuals were targeted *because* of their membership in one of the four protected groups.⁸⁵ In *Jeselić*, the Trial Chamber clarified, writing: “[T]he intention must be to destroy the group “as such,” meaning as a separate and distinct entity, and not merely some individuals because of their membership in a particular group.”⁸⁶

Underlying Crimes

The underlying crimes required by statute are as follows: killing members of the group; causing serious bodily or mental harm to members of the group; deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part; imposing measures intended to prevent births within the group; forcibly transferring children of the group to another group. Because the underlying crimes required by the Genocide Convention to show that genocide occurred are relatively more straightforward as compared to the requirements for *dolus specialis*, and for brevity purposes, there will not be an in-depth examination of each element. Clarification and explanation will be provided as necessary in the analysis that follows.

Applying Boarding Schools to the Genocide Convention

Intent to Destroy

The first requirement of *dolus specialis*, intent to destroy, is met. Boarding schools, specifically off-reservation boarding schools, were designed to effectively stamp out Native culture and tradition. Off-reservation schools were only established after the government and other assimilationists, including the founder of the first off-reservation school, Richard Pratt, felt children were not far enough removed from tribal life while attending reservation schools. Pratt argued:

. . . that as long as boarding schools were primarily situated on reservations, then: 1) it was too easy for children to run away from school; and 2) the efforts to assimilate Native children into boarding schools would be reversed when

⁸² <https://www.refworld.org/docid/3ae6b3ac0.html>. UN General Assembly, *Convention on the Prevention and Punishment of the Crime of Genocide*, 9 December 1948, United Nations, Treaty Series, vol. 78, p. 277; 18 U.S. Code § 1091.

⁸³ *Brđanin*, Case No. IT-99-36-T, ¶ 683

⁸⁴ *Prosecutor v. Akayesu*, Case No. ICTR-96-04, Judgment, ¶ 513

⁸⁵ *Prosecutor v. Bagojević & Jokić*, Case No. IT-02-60-T, Judgment, ¶ 669

⁸⁶ *Jeselić*, Case No. IT-95-10-A, Judgment, ¶ 47, citing ILC Draft Articles, p. 88

children went back home to their families during the summer. He proposed a system where children would be taken far from their homes at an early age and not returned to their homes until they were young adults.⁸⁷

Pratt is famous for saying “kill the Indian, save the man.” Other schools across the country were modeled after this “kill the Indian, save the man” philosophy. While only a portion of children forced into boarding schools may have died, assimilationists like Richard Pratt made the mission clear: destroying the Natives.

While the ICTY Appeals Chamber has required that destruction be physical or biological,⁸⁸ there has been disagreement about whether this should actually be required under “intent to destroy.”⁸⁹ Judge Shahabuddeen gives compelling reasons why destruction should not be limited to physical or biological destruction.⁹⁰ Given this disagreement and the strong justifications for including destruction of cultural and other characteristics, a tribunal would be well within the statute to rule that intent to destroy cultural characteristics, like the destruction of cultural characteristics, including language and religion, seen in boarding schools, satisfies the requirement of intent to destroy.

However, there was physical destruction at boarding schools as well. Conditions in the schools were “deplorable.”⁹¹ “Children were given inadequate food and medical care, and conditions were overcrowded in these schools” to keep the cost of care as low as possible.⁹² “As a result, children routinely died in mass numbers of starvation and disease.”⁹³ Deaths also occurred as a result of medical neglect, often from common ailments.⁹⁴

One researcher, Preston McBride, estimates that “as many as 40,000 children may have died in or because of their poor care at the U.S.-run schools.”⁹⁵ McBride has documented 1,000 deaths from 1879 to 1934 in four of the almost 500 schools, which includes non-boarding schools on reservations.⁹⁶ There have been efforts to uncover death tolls at individual schools, like those at

⁸⁷ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. “Indigenous Peoples and Boarding Schools: A comparative study.” Andrea Smith. United Nations.

⁸⁸ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 25

⁸⁹ *Blagojević*, Case No. IT-02-60-T, Judgment ¶ 659; *Kristić*, Case No. IT-98-33-A, Partial Dissenting Opinion of Judge Shahabuddeen ¶¶ 45-54

⁹⁰ *Ibid.*

⁹¹ https://obamawhitehouse.archives.gov/sites/default/files/docs/20141129nativeyouthreport_final.pdf. 2014 Native Youth Report - The White House, citing http://www.narf.org/nill/merriam/n_merriam_chapter9_part1_education.pdf. Meriam Report: The Problem of Indian Administration. 1928.

⁹² https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. “Indigenous Peoples and Boarding Schools: A comparative study.” Andrea Smith. United Nations.

⁹³ *Ibid.*

⁹⁴ *Ibid.*

⁹⁵ <https://www.reuters.com/world/us/native-americans-decry-unmarked-graves-untold-history-boarding-schools-2021-06-22/>. “Native Americans decry unmarked graves, untold history of boarding schools.” Brad Brooks. Thompson Reuters. 22 June 2021.

⁹⁶ *Ibid.*

Genoa Indian School, where researchers with the Genoa Indian School Digital Reconciliation Project found names of 102 students who died at the school.⁹⁷

The federal government has never released the number of children who attended schools, “how many died in or went missing from them, or even how many schools existed,”⁹⁸ making it difficult to get an accurate picture of the extent of physical destruction. However, in June 2021, U.S. Interior Secretary Deb Haaland announced the Interior Department’s plan to investigate deaths at boarding schools.⁹⁹ The press release for this announcement stated:

The Federal Indian Boarding School Initiative will serve as an investigation about the loss of human life and the lasting consequences of residential Indian boarding schools. The primary goal will be to identify boarding school facilities and sites; the location of known and possible student burial sites located at or near school facilities; and the identities and Tribal affiliations of children interred at such locations.¹⁰⁰

The final report of this investigation will be submitted to Secretary Haaland by April 1, 2022.¹⁰¹ As this investigation and other investigations continue, the death toll is expected to rise, further supporting the contention that the United States intended to physically destroy Native Americans. Given that the United States was responsible for funding schools, and consciously chose to do so inadequately, there was intent to physically destroy Native Children.

As the picture of physical destruction becomes clearer, so too does the issue of forcible transfer as a means of destruction. Here, children were forcibly taken from their homes and put into boarding schools.¹⁰² The Appeals Chamber at ICTY held that forcible transfer may be used as evidence of the intent to destroy.¹⁰³ However, because of the tension between this ruling and the rulings in *Brđanin* and *Stakić*, a better understanding of the number of deaths is needed to address whether a court would likely find the forcible transfer of children to boarding schools

⁹⁷ <https://www.usatoday.com/story/news/nation/2021/11/15/nebraska-native-americans-boarding-school/8624013002/>. “Researchers uncover names of 102 Native Americans who died at a Nebraska boarding school.” Associated Press. 15 November 2021.

⁹⁸ <https://www.reuters.com/world/us/native-americans-decry-unmarked-graves-untold-history-boarding-schools-2021-06-22/>. “Native Americans decry unmarked graves, untold history of boarding schools.” Brad Brooks. Thompson Reuters. 22 June 2021.

⁹⁹ <https://www.doi.gov/pressreleases/secretary-haaland-announces-federal-indian-boarding-school-initiative>. “Secretary Haaland Announces Federal Indian Boarding School Initiative.” U.S. Department of the Interior. 23 June 2021. See also <https://www.doi.gov/sites/doi.gov/files/secint-memo-esb46-01914-federal-indian-boarding-school-truth-initiative-2021-06-22-final508-1.pdf>. Memo from Secretary Haaland Regarding Federal Indian Boarding School Initiative. U.S. Department of the Interior. 22 June 2021.

¹⁰⁰ <https://www.doi.gov/pressreleases/secretary-haaland-announces-federal-indian-boarding-school-initiative>. “Secretary Haaland Announces Federal Indian Boarding School Initiative.” U.S. Department of the Interior. 23 June 2021.

¹⁰¹ *ibid.*

¹⁰² <https://www.narf.org/cases/boarding-school-healing/>. “Boarding School Healing.” Native American Rights Fund. 1 July 2021.

¹⁰³ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 31

as satisfying the requirement of intent to destroy. Regardless, the requirement is met because of the cultural and physical destruction that occurred at the boarding schools.

In Whole or In Part

The second requirement of *dolus specialis*, in whole or in part, is met. There must be intent to destroy a distinct part of a group, not just individuals within a group.¹⁰⁴ Here, the government targeted Native Americans generally. Since boarding schools did not target this whole group, and instead targeted only children, the case law has required that a “substantial” part of the group is targeted.¹⁰⁵ Whether the targeted group is considered substantial may be determined either by the number of persons targeted or by the targeted group’s prominence in the broader context of the group.¹⁰⁶ Children are essential to the survival of any culture. Without children who will grow into adults, traditions, language, and effectively the entire group can be lost forever. Because a culture or group cannot continue without children, the Native children forced to attend boarding school must be considered prominent or substantial under the requirement of in whole or in part.

National, Ethnical, Racial, or Religious Group

The third requirement of *dolus specialis*, national, ethnical, racial, or religious group, is met. A group whose members share the same language and culture have been designated as an ethnic group.¹⁰⁷ Stigmatization of the group by the perpetrators of the crime on the basis of perceived national, ethnical, racial, or religious characteristics is also another way to determine whether this requirement has been met.¹⁰⁸ While not all Native Americans share the same language—languages vary from tribe to tribe¹⁰⁹—there are various cultural elements that are common throughout tribes. These include home, spirituality, traditional language, and traditional beliefs.¹¹⁰ Notably, Native children were stripped of these cultural elements when they were forced into boarding schools. The government stigmatized Natives throughout the course of history with legislation like the Indian Removal Act, designed to resolve what the government perceived as the “Indian problem.”¹¹¹ simply because they were Native. Furthermore, the federal government, who is also the perpetrator, recognizes Native American as a racial group.¹¹² Because Natives were consistently stigmatized by the government, and are classified

¹⁰⁴ *Brđanin*, Case No. IT-99-36-T, ¶ 700

¹⁰⁵ *Prosecutor v. Simba*, Case No. ICTR-01-76-T, Judgment, ¶ 412

¹⁰⁶ *Kristić*, Case No. IT-98-33-A, Appeals Chamber Judgment ¶ 12

¹⁰⁷ *Prosecutor v. Akayesu*, Case No. ICTR-96-04, Judgment, ¶ 513

¹⁰⁸ *Brđanin*, Case No. IT-99-36-T, ¶ 683

¹⁰⁹ <https://americanindian.si.edu/nk360/code-talkers/native-languages/>. “Chapter 2: Native Languages: Native Words, Native Warriors.” Native Words, Native Warriors - National Museum of the American Indian.

¹¹⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3726553/>. “American Indian cultures: how CBPR illuminated intertribal cultural elements fundamental to an adaptation effort.” Leslie Jumper-Reeves et al. *Prevention science: the official journal of the Society for Prevention Research*. p. 547-56. August 2014. Vol. 15,4.

¹¹¹ <https://www.potawatomi.org/blog/2018/09/07/the-united-states-handling-of-the-indian-problem/>. “The United States’ Handling of the Indian Problem.” Potawatomi.org. 7 September 2018.

¹¹² <https://www.census.gov/topics/population/race/about.html>. “About the Topic of Race.” United States Census Bureau. 3 December 2021.

as a race by the government, the requirement of national, ethnical, racial, or religious group is satisfied.

As Such

The fourth requirement of *dolus specialis*, as such, is met. As such requires that individuals were targeted *because* of their membership in one of the four protected groups.¹¹³ These boarding schools were established *for* Native children *because* they were Native. Funding for these schools was administered by the Bureau of Indian Affairs with the ultimate goal of “civilizing” Natives.¹¹⁴ No other racial, ethnical, racial or religious group was included in the mandate for boarding school attendance. For that reason, the requirement of as such is satisfied.

Underlying Crimes

Only one of the five underlying crimes is necessary to prove genocide. Here, the United States government used compulsory boarding schools to commit four of the five underlying crimes against Native Americans. First, the government’s choice to underfund these schools, which led to malnutrition and medical neglect, and ultimately the deaths of many children¹¹⁵, satisfying the first crime of killing members of the group.

Second, the abuse children faced at the hands of teachers and staff at the boarding schools satisfies the underlying crime of causing serious bodily or mental harm to members of the group. One Ojibwe woman, Denise Lajimodiere recalls how her mother was treated while in attendance: “Mama was made to kneel on a broomstick for not speaking English, locked in closets for not speaking English. They would pee their pants and then the nuns would take them out [of the closet] and beat them for peeing their pants.”¹¹⁶ She also recalls her father’s experience, saying, “Papa was beaten with a belt. He saw one of his fellow students die from a beating at the school.”¹¹⁷ Her father told her of how, when he struggled to learn English, “they put lye soap in his mouth and the kids would get blisters.”¹¹⁸ Unfortunately, these were not isolated incidents. Lajimodiere has worked on collecting others’ stories, too. One woman told her about the sexual abuse she experienced at the hands of those running the schools, adding, “Almost every survivor in the book experienced sexual abuse, or they witnessed it.”¹¹⁹ The number of similar accounts to those detailed above are overwhelming. The physical and sexual abuse was rampant. Physical abuse is the very definition of serious bodily harm.¹²⁰ For this reason, the second underlying crime of causing serious bodily or mental harm to members of the group is satisfied.

¹¹³ *Prosecutor v. Bagojević & Jokić*, Case No. IT-02-60-T, Judgment, ¶ 669

¹¹⁴ <https://calendar.eji.org/racial-injustice/mar/03>. “Congress Creates Fund to ‘Civilize’ Native American People. Equal Justice Initiative.

¹¹⁵ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. “Indigenous Peoples and Boarding Schools: A comparative study.” Andrea Smith. United Nations.

¹¹⁶ <https://www.mprnews.org/story/2019/10/03/stories-of-life-in-indian-boarding-schools>. “‘I’ve never told anyone’: Stories of life in Indian boarding schools.” Dan Gunderson. MPR News. 3 October 2019.

¹¹⁷ *Ibid.*

¹¹⁸ *Ibid.*

¹¹⁹ *Ibid.*

¹²⁰ Minn. Stat. § 260C.007; Minn. Stat. § 609.221

The physical and sexual abuse, along with the neglect experience in boarding schools also satisfies the third underlying crime: conditions of life calculated to bring about the group's physical destruction in whole or in part. In some schools, children would often be given only one sandwich for a whole day.¹²¹ Children need anywhere from 1,200 to 3,200 calories a day, depending on their age and activity level.¹²² At the schools, children were often forced to do grueling manual labor,¹²³ suggesting they had a high activity level, and their caloric needs would be toward the higher end of the range. For reference, a sandwich made with 2 slices of white bread and two ounces of turkey contains around 210 calories,¹²⁴ falling far below the low end of the range. However, it does not take knowledge of calories to know that one sandwich a day for a child is not enough. In fact, in Canadian boarding schools modeled after United States boarding schools, "Government and church authorities were well aware of the extent of hunger and malnutrition in the schools."¹²⁵ It would not be farfetched to assume the same was true in United States boarding schools given how closely Canadian schools mirrored those in the United States. Those running the schools neglected these children's basic nutritional needs, knowing it would cause physical destruction to at least part of the group. For this reason, the third underlying crime is satisfied.

The fourth underlying crime, imposing measures intended to prevent births within the group, does not apply here. However, it is worth noting that the United States government had admitted to sterilizing over 3,000 Native women between the years 1973 and 1976.¹²⁶ However, for the purposes of this analysis—boarding schools as a form of genocide—this does not satisfy the fourth underlying crime.

The fifth underlying crime, forcibly transferring children of the group to another group, is satisfied by the mandated attendance at boarding schools run by a variety of Christian denominations.¹²⁷ ¹²⁸ Attendance was forced by what is tantamount to kidnapping.¹²⁹ Parents

¹²¹ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. "Indigenous Peoples and Boarding Schools: A comparative study." Andrea Smith. United Nations.

¹²² <https://www.nhlbi.nih.gov/health/educational/wecan/downloads/calreqtips.pdf>. "Parent Tips: Calories Needed Each Day." National Heart, Lung, and Blood Institute.

¹²³ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. "Indigenous Peoples and Boarding Schools: A comparative study." Andrea Smith. United Nations.

¹²⁴ <https://www.livestrong.com/article/319360-how-many-calories-are-in-a-turkey-sandwich/>. "How Many Calories are in a Turkey Sandwich?" LIVESTRONG.COM

¹²⁵ <https://www.scientificamerican.com/article/canadas-residential-schools-were-a-horror/>. "Canada's Residential Schools Were a Horror." Ian Mosby & Erin Millions. Scientific American. 1 August 2021.

¹²⁶ <https://www.nlm.nih.gov/nativevoices/timeline/543.html>. "Government admits unauthorized sterilization of Indian Women." U.S. National Library of Medicine.

¹²⁷ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. "Indigenous Peoples and Boarding Schools: A comparative study." Andrea Smith. United Nations.

¹²⁸ <http://www.mnchurches.org/blog/2021/02/8/indigenous-organization-seeks-church-partners-truth-telling-healing-around-indian>. Minnesota Council of Churches.

¹²⁹ https://www.un.org/esa/socdev/unpfii/documents/IPS_Boarding_Schools.pdf. "Indigenous Peoples and Boarding Schools: A comparative study." Andrea Smith. United Nations.

had the choice of sending their children to these schools or being imprisoned for refusing¹³⁰— not a choice at all. Through these abductions, the children were forcibly transferred to another group, Christians, to force “American” values onto them.¹³¹ For this reason, the fifth underlying crime is satisfied.

Redress, Next Steps, and Conclusion

Knowing that the actions taken by the United States government in boarding schools amounts to genocide of Native Americans under both federal and international law, the next logical question is this: where do we go from here? The Interior Secretary has already started with the most obvious in creating The Federal Indian Boarding School Initiative to investigate the conditions of abuse and deaths in the schools. To expect the full picture to emerge from this may be naïve, though. Canada took a similar approach with their Truth and Reconciliation Commission (TRC), eventually publishing a final report in 2015.¹³² However, throughout 2021, hundreds of unmarked graves were found across multiple Canadian boarding schools,¹³³ suggesting the TRC report was not a definitive picture of boarding schools. Hopefully, the United States will take these findings into account in determining the scope and focus of their investigation. Given that the United States government has been notoriously evasive about boarding schools,¹³⁴ it seems reasonable to recognize the magnitude of this investigation while remaining skeptical about the transparency of the findings.



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¹³⁰ <https://eji.org/news/history-racial-injustice-cultural-genocide/>. “‘Cultural Genocide’ and Native American Children.” Equal Justice Initiative. 1 September 2014.

¹³¹ http://www.nativepartnership.org/site/PageServer?pagename=airc_hist_boardingschools. “Native American History and Culture: Boarding Schools.” Northern Plains Reservation Aid; <https://americanindian.si.edu/nk360/code-talkers/boarding-schools/>. “Chapter 3: Boarding Schools: Native Words, Native Warriors.” Native Words, Native Warriors – National Museum of the American Indian.

¹³² https://publications.gc.ca/collections/collection_2015/trc/IR4-7-2015-eng.pdf. “Honouring the Truth, Reconciling for the Future.” Truth and Reconciliation Commission of Canada. 2015.

¹³³ <https://www.bbc.com/news/world-us-canada-57592243>. “Canada: 751 unmarked graves found at residential school.” BBC News. 24 June 2021

¹³⁴ <https://www.reuters.com/world/us/native-americans-decry-unmarked-graves-untold-history-boarding-schools-2021-06-22/>. “Native Americans decry unmarked graves, untold history of boarding schools.” Brad Brooks. Thompson Reuters. 22 June 2021.

Establishment of Canada's TRC was a result of the Indian Residential Schools Settlement Agreement.¹³⁵ In this settlement, a formal apology was given, monetary reparations, known as Common Experience Payments, were made, and a commitment to health and healing were included, among other initiatives.¹³⁶ This settlement could serve as a blueprint for one avenue the United States could take in efforts at redress. A specific focus on health and healing will be necessary. Former Assistant Secretary of Indian Affairs Kevin Gover, of Pawnee descent, summarized the issues Natives are still faced with today largely as a result of the boarding school experience, saying:

“The trauma of shame, fear, and anger has passed from one generation to the next, and manifests itself in the rampant alcoholism, drug abuse, and domestic violence that plague Indian country. . . So many of the maladies suffered today in Indian country result from the failures of [the Bureau of Indian Affairs].”¹³⁷

In 2014, the Obama Administration published a report titled “2014 Native Youth Report,” which highlighted educational, socioeconomic, and health disparities faced by Native Americans.¹³⁸ Reports like this will continue to be crucial in informing the government's path toward reconciliation with the Native community, especially as it relates to health and healing.

Domestic prosecution is highly unlikely in this case. First, the United States chose not to codify the Genocide Convention until 1988.¹³⁹ Therefore, genocide committed before 1988, like what was done through boarding schools, cannot be prosecuted retroactively under the statute. In 1978, the Indian Child Welfare Act was passed, which ended mandatory attendance for Native children at boarding schools.¹⁴⁰ It is likely, then, that the most damning acts of genocide occurred prior to 1978, prior to when genocide was recognized statutorily as a crime. For that reason, domestic prosecution is not an option for redress for these crimes. Prosecution at the International Criminal Court (ICC) is not an option either. The United States is not a party to the Rome Statute, which gives the Court jurisdiction over signatory parties to prosecute the crime

¹³⁵ <https://www.rcaanc-cirnac.gc.ca/eng/1100100015576/1571581687074#sect7>. “Indian Residential Schools Settlement Agreement.” Government of Canada. 9 June. 2021.

¹³⁶ *Ibid.*

¹³⁷ https://obamawhitehouse.archives.gov/sites/default/files/docs/20141129nativeyouthreport_final.pdf. 2014 Native Youth Report - The White House, *citing* <http://www.nativeweb.org/pages/legal/gover.html>. “Remarks at the Ceremony Acknowledging the 175th Anniversary of the Establishment of the Bureau of Indian Affairs.” Kevin Gover, Assistant Secretary – Indian Affairs. U.S. Department of the Interior. 8 September 2000.

¹³⁸ https://obamawhitehouse.archives.gov/sites/default/files/docs/20141129nativeyouthreport_final.pdf. 2014 Native Youth Report - The White House.

¹³⁹ 18 U.S. Code § 1091.

¹⁴⁰ <https://www.npr.org/2021/07/11/1013772743/indian-boarding-school-gravesites-federal-investigation>. “A Federal Probe into Indian Boarding School Gravesites Seeks to Bring Healing.” Noelle E. C. Evans. National Public Radio. 11 July 2021; 25 U.S. Code § 1902

of genocide, among other crimes.¹⁴¹ In addition, that court has jurisdiction only over crimes occurring from the year 2002 and forward.

Even without the temporal and jurisdictional limitations of domestic and international prosecution, it would still be difficult and unlikely. Boarding schools began in the 1800s,¹⁴² meaning many of the individual perpetrators, whether government officials or teachers and administrators, are long gone. However, it is important to remember, the United States is not as far removed from this history as it may seem. There are still boarding school survivors alive today, and there are undoubtedly boarding school employees who were responsible for the abuse, neglect, and deaths still alive, too. Holding them accountable as individuals would be difficult and possibly even ineffective in the larger scheme of transitional justice. Ultimately, the United States government is responsible for boarding school genocide and any criminal charges that could be brought should be directed accordingly.

Conclusion

The United States used boarding schools to commit genocide against Native children. The legal requirements outlined in The Convention on the Prevention and Punishment of the Crime of Genocide, which were codified into the United States Code, have been met. The statute has four special intent requirements: intent to destroy, in whole or in part, a national, ethnical, racial, or religious group, as such. The United States government's actions satisfied all four elements. The statute has five underlying crimes, only one of which must be met. The government's actions satisfied four of the five underlying crimes. All the legal requirements for genocide, therefore, appear to have been met.

While prosecution, whether international or domestic, is highly unlikely or even impossible, the United States can take responsibility by focusing on other options for redress and reparation. They can follow Canada's lead, since Canada modeled their boarding schools after the United States' schools, and come to a settlement agreement with the Native community. This agreement should offer monetary reparations as well as providing community resources to aid in healing and health for addressing intergenerational trauma from the boarding school experience. Taking responsibility for the genocide of Native children through the boarding schools is the only way the United States can begin to address the lasting impact of these actions on Native communities.

Image Sources:

Male Students at Carlisle Indian Industrial School, Pennsylvania, c. 1896 -

<https://www.flickr.com/photos/lac-bac/12949218455>

¹⁴¹ <https://www.icc-cpi.int/resource-library/documents/rs-eng.pdf>. "The United Nations Rome Statute of the International Criminal Court." International Criminal Court. 2001.

¹⁴² <https://www.theindigenousfoundation.org/articles/us-residential-schools>. "The U.S. History of Native American Boarding Schools." Melissa Mejia. The Indigenous Foundation. 18 July 2021; <https://www.nlm.nih.gov/nativevoices/timeline/357.html>. "First Off-Reservation Boarding School for Native Children Opens." U.S. National Library of Medicine

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