

**CONFEDERATED SALISH & KOOTENAI TRIBES
TRIBAL EDUCATION DEPARTMENT
JOHNSON O'MALLEY PROGRAM
POLICY HANDBOOK**



A People of Vision

The CSKT Tribal Education Department's (TED) goal is to create a safe environment for children, physically, mentally, socially, and emotionally.

All entities that receive Johnson O'Malley (JOM) funding from the Confederated Salish and Kootenai Tribes (CSKT) are subject to the provisions contained in this handbook.

The purpose of the JOM program is to provide supplementary financial assistance to meet the specialized and unique educational needs of eligible JOM students. JOM funds are supplementary funds and are not to take the place of federal, state, or local funds, including programs that are supplemental to the regular school programs. The CSKT JOM program funds may **not** be utilized to cover any activities or expenses that do not benefit students academically or culturally. This includes any school sponsored fees, activities, or additional requirements for student participation in, but not limited to: clubs, extra-curricular activities, sports, field trips, etc., that do not benefit the students academically or culturally.

Each Indian Education Committee (IEC) will be designated a Tribal Education Advocate (TEA) to provide guidance and technical assistance for all JOM matters. The TEA collaborates with IECs in meetings to advocate for parents and their JOM students and to keep families informed of issues facing Indian students in the local schools. The TEA provides assistance on IEC by-laws and budgets and has the authority to approve or deny all expenditure requests.

TED's expectation is that each IEC and school district work collaboratively in a positive professional manner for the best interest of all children in the district. In representing the IEC, personal agendas needs to be omitted from the work at hand. If any issues arise, the IEC member(s) will take the issue to the district and/or TED to be addressed; if needed, the concern will move up the proper chain of command.

JOM ELIGIBILITY:

A Native American student is eligible for JOM benefits if the student is between ages 3 through grade 12 and either:

- Is a member of a federally recognized tribe, or
- Has at least $\frac{1}{4}$ or more degree of blood from a federally recognized tribe(s).

A student can meet the $\frac{1}{4}$ or more degree blood quantum requirement through combined blood from different federally recognized tribes.

If a student's Certificate of Indian Blood (CDIB) or other documentation also shows that the child is a member of a federally recognized tribe, then no further documentation is necessary. Otherwise, a CDIB alone is sufficient to show eligibility only if it shows that the student has $\frac{1}{4}$ degree blood quantum from a federally recognized tribe (or multiple federally recognized tribes). If a child is not yet a tribal member and the CDIB does not show $\frac{1}{4}$ blood quantum from a federally recognized tribe(s), then the CDIB alone is not sufficient to show eligibility, but the student could show eligibility by providing a letter or other documentation from the tribe explaining the circumstances (e.g., that the tribe is still processing the enrollment paperwork but the child meets tribal membership requirements).

It is the responsibility of the parent/guardian to submit all required documentation. It is the TEA's responsibility to determine each Indian student's eligibility and verify all forms for completeness. If incomplete, that student will not be counted as eligible for JOM funding/services until all documents have been completed.

INDIAN EDUCATION COMMITTEE (IEC) APPLICANTS

Any parent/guardian of a JOM eligible student who is interested in a position on an IEC must fill out a background check with our Tribal Personnel Department; TED also has the background check applications available. See page 8 below for more information.

JOM SUB-CONTRACTOR (IEC) OBLIGATIONS:

The TED TEA is available to assist with completing any of the required paperwork that is needed to ensure compliance with the federal JOM regulations and the CSKT policy. Each IEC must comply with the following responsibilities before any funding may be released.

1. Collaborate with your TEA in establishing and updating an accurate JOM student list from the JOM count day and submit it to your designated TEA for student verification by October 31st. Minimum required information for student JOM list must include: last name, first name, DOB, grade level, tribal affiliation, and contact information of parent/guardian.
 - a) IEC Chairpersons are strictly responsible for safeguarding the list of student counts.
2. Submit all JOM Certification forms to the TEA immediately if they are turned in to the IEC. Any unfinished documents will be sent back to either the parent or school to be completed.
3. Distribute a Needs Assessment Survey to **all** parents of JOM eligible students. The Needs Assessment Survey must be conducted **yearly**. This may include distributing at events such as:
 - a) Parent/Teacher conferences
 - b) School, sporting, or community events
 - c) IEC meetings
 - d) Phone calls
 - e) Mail out
 - f) On-line
4. Compile and tally the Needs Assessment Survey results. These results will determine the IEC's budget plan, goals, and objectives for that school year. Your budget must be formatted to meet the highest priorities per your Needs Assessment Survey.
5. Each IEC officer must read this Johnson O'Malley Policy Handbook.

IECs are also responsible for complying with required documentation and reporting to the TED. Once an IEC is established, the following documents and duties are essential to continue with committee tasks.

1. Ratify and submit the IEC's by-laws annually to TED.
2. Create a Needs Assessment Survey and distribute to all JOM eligible parents annually.
3. Collect and tally the results of the Needs Assessment Survey.
4. Establish a budget based on the top priorities of the Needs Assessment Survey.
5. At each IEC monthly meeting, distribute agendas, meeting minutes, and budgets to the TEA and community.
 - a) Meeting Notice must be posted publicly at least 24 hours prior to the meeting. This ensures that the public will be informed of the meeting time, location and topics to be discussed. These notices can be listed in the Char-Koosta newspaper, displayed in a public location such as local Post Office, grocery store or school building entries, posted to Facebook, etc.
 - b) Meeting minutes should be specific to JOM business. IECs are able to conduct Title VI and/or Impact Aid business at the same meeting but opening and closing each funding source is required and must be documented in the minutes.
6. Communicate monthly with the TEA.

7. Approve all expenditures by committee vote and submit all required documentation to the TEA for final approval/disapproval of funds prior to ordering and/or spending.
8. Complete JOM Annual Feedback and submit it to the TED.
9. Hear grievances and requests from JOM parents related to the program.

Each IEC is required to submit to the TEA their annually approved by-laws and Needs Assessment Survey results prior to expenditures. The TEA will not approve expenditure requests and disburse funds until an IEC has submitted all required documentation. Estimated budgets may be substituted during August – October. Update your budget as needed throughout the school year.

If an IEC is not able to complete duties as outlined or create a functioning IEC, the TED will resume the responsibilities of that IEC. A case-by-case grievance will be available.

NEEDS ASSESSMENT SURVEY:

The Needs Assessment Survey (also known as Parent Survey or Parent Needs Assessment Survey) must be filled out by JOM parents at the beginning of each school year and is due to the TED prior to October 1st. The purpose of the Parent Survey is to identify the top priorities of the parents and will determine how the IEC allocates its budget throughout the school year.

The IEC members are responsible for the distribution and collection of the Parent Surveys and any additional forms required for a student to be considered JOM eligible. If requested by the IEC, the TEA will be available to assist with all documents, processes, and IEC obligations.

JOM DISBURSEMENTS:

The JOM funds are managed by the CSKT's TED and are assigned into each IEC's sub-account within Tribal Education. The total award amount available to an individual IEC will be based on the verified JOM student count that is submitted by each IEC and/or school district each year, unless the overall JOM budget has been restructured.

The disbursements of the JOM funds will be released to each IEC, business or persons providing services based on individual expenditure requests. If a specific purchase was preapproved by the IEC, the reimbursement will be released back the designated IEC member who purchased an item(s). In order for the TED to approve and release the funds, the IEC must complete all required documentation and submit it with the expenditure request. If documentation is not complete, the funds will be held until all documents are submitted. See below for required documents.

Any unspent IEC JOM funds will be deposited into the Tribes' JOM account at the end of the school year. There will be no carry-over of funds; all funds must be expended or obligated prior to **June 1st**. No more than 10% of the total budget should remain for the upcoming year's obligated expenditures.

REQUEST FOR FUNDS:

All expenditures must be based on each individual IEC's Needs Assessment Survey results. All expenditure requests must be submitted and approved prior to purchases.

IEC expenditure requests may be sent via email, mail, or brought in to the TED office. The TEA requires the following documents within five (5) working days of purchase:

1. Committee minutes supporting the request

2. Expenditure request form
3. Questionnaire
4. Invoices and/or receipts
5. Written contract and W9 (when needed),

The TED's JOM expenditure request approval procedures are outlined below:

1. Expenditure requests must be voted on during an IEC meeting that has a quorum and be reflected in the minutes.
2. Each separate vendor must have an expenditure request and contract, if needed.
3. Expenditure requests must be filled out completely and signed by a designated IEC official.
4. Expenditure Request Questionnaire must be filled out in detail and explain how it meets your IEC's Needs Assessment.
5. Detailed list of products/services being requested.
6. If the TEA has provided prior approval, all receipts and necessary documentation from a service or product for reimbursement must be submitted to TED within five (5) working days of the expense.
7. Unless the IEC has received prior approval from TED, all meals for meetings must be purchased through an approved vendor that will invoice TED.

Your designated TEA will review each expenditure request, compare it to the Needs Assessment Survey, and approve or deny it based on the information provided. The individual IEC requesting the funds will be notified within three (3) working days on whether or not their expenditure request was "approved" or "denied."

If determined "approved," the check process will begin and it may take up to 2 weeks to receive the check. If the request is determined "denied," a phone call, letter, or email from your designated TEA will explain the denial. The IEC may file a grievance regarding the denied request.

Accounting records for each IEC will be kept at the TED for review during business hours. The TEA will also provide or send a monthly budget report for IEC meetings. Each IEC will must also keep accounting records that contain:

1. Expenditure requests with all appropriate signatures.
2. Needs Assessment Questionnaire attached to request.
3. Receipts for each expenditure request or invoices.
4. Spreadsheet to accurately track your budget as money expended.

CSKT GUIDELINES FOR JOM FUNDING:

- Any misappropriation of funds or property, including irreparable damage or the monetary equivalent, will be reviewed and recovered on a case-by-case basis.
- School administrators, CSKT Council, and TED staff are not allowed to be voting members of the IEC; this could be viewed as conflict of interest.
- Any item purchased over \$100.00 with JOM funds must be kept in a neutral location, such as the school district or TED. At no time shall the item be kept in anyone's home, and these items should be inventoried by the IEC/TEA.
- No funds shall be disbursed unless it is voted on by the IEC voting quorum, established in IEC by-laws, and then approved by the TED.
- JOM funds are to be used to meet the JOM students' specialized and unique educational needs.

- The CSKT JOM program funds cannot be used to cover any school sponsored fees, activities, or additional requirements for student participation in, but not limited to: clubs, extra-curricular activities, sports, field trips, etc. that do not benefit the students academically or culturally.
- JOM funds shall NOT be used to supplant, supersede, or replace existing school programs. They are to be used in addition to the school programs that already exist. All expenditures must be based off the Needs Assessment results.
- JOM funds are to be used to create long-lasting, beneficial effects for eligible students.
- Only IEC officers shall handle funds or products.

CSKT JOM/IEC TIMELINE:

The CSKT TED will determine the timeline for the JOM funds.

Each IEC, as set by its by-laws, will determine the frequency of meetings (i.e. monthly, bi-monthly, quarterly, etc.), and is required to check-in monthly with its TEA.

JOM YEARLY CALENDAR

Note: The National Johnson O’Malley Association (NJOMA) conference is held annually but has been held in different times of the year. If your budgets reflect committee members attendance at the NJOMA conference, be aware of what year this is allocated from.

August

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
IEC Meeting/Election of IEC Officers	August 31 st
Needs Assessment Disbursed to Parents/Students	August 31 st
Annual IEC Feedback Report	August 31 st

September

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Reservation Wide IEC Training	September 30 th
Monthly IEC Meeting	September 30 th
Needs Assessment Survey Collected/Counted	September 30 th
Create a Priority Plan Based on Needs Assessment Results	September 30 th
Review/Submit and Ratify IEC Bylaws	September 30 th

October

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	October 31 st
Official JOM Count Submitted	Second Week of October
Submit Budget Based on Needs Assessment	October 31 st
TED verifies JOM Count	October 31 st

The CSKT Education Department receives the JOM funds in October each year.

The IEC Chairpersons will be notified of the funding amount they will be awarded. This amount will be calculated based off the total number of verified JOM student count. The JOM count must be submitted no later than the end of the second week of October each calendar year. No expenditures from projected Fiscal Year funds shall be spent prior to this date without prior approval.

November

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	November 30 th

December

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	December 31 st
Reservation Wide IEC Training	December 31 st

January

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting (If cultural observances allow)	January 31 st

February

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	February 28 th
Reservation Wide IEC Training	February 28 th

March

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	March 31 st

April

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	April 30 th

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Review Budget- Planning for Remaining Funds	April 30 th

May

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
Monthly IEC Meeting	May 31 st
Reservation Wide IEC Training	May 31 st

June

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
All JOM Funding Expended/Obligated	June 1 st
Monthly IEC Meeting	June 30 th
Begin working on Needs Assessment Survey for Next Year	May 31 st

All JOM funds from the academic year must be spent by June 1st each year. Any funds that are not obligated for the year will be returned to the TED. This includes any unspent monies issued to the schools. **Funds do not carry over!**

July

PROJECTS/MEETINGS/ETC.	COMPLETION DATE
No activities	NA

*(NOTE) Due to COVID-19, we understand the need for social distancing and protected health measures. Therefore, we encourage each IEC to outline in their by-laws how the meetings will be conducted and the requirements needed for individual/group requests. We suggest an easily accessed platform (Zoom, Facebook Video, Microsoft Teams, etc.).

Code of Conduct for IEC, Businesses or Persons Providing Services Utilized by the Tribal Education Department (TED)/Indian Education Committee (IEC):

As a Johnson O' Malley (JOM) IEC volunteer, I agree to:

- Be conscious of the fact that everything I do, directly or indirectly, has the potential to reflect upon the IEC, the TED, and CSKT as a whole.
- Respect and comply with all applicable laws and regulations.
- Avoid all conflict of interests when considering vendors.
- Accept no gifts or favors that might influence the performance of my responsibilities.
- Be familiar with the written policies and procedures set forth by the TED. Any verbal direction should be followed up in an email.
- Not be in possession or under the influence of alcoholic beverages or illegal drugs while reporting to the program or during activities held by the program.
- Not endanger the life, safety, health, or well-being of others.

Background Checks Policy:

The TED is committed to the protection of all persons who are associated with the Department, including members, staff, volunteers, and guests. TED's goal is to create a safe environment for children physically, mentally, socially, and emotionally.

- 1) TED will utilize the Tribal Personnel Department's individual background checks for all volunteers and vendors who sit on the IEC and/or have direct and repetitive contact with children participating in our programs. These forms are available through the TED or the Tribal Personnel Department.
- 2) Prior to volunteer service or employment with the IEC, a background check will be required for submittal to the Personnel Department. Background checks will be renewed every two years.
- 3) If a legal action or crime is pending, a volunteer or vendor may be asked to step down from their position or discontinue services if it can negatively affect TED/JOM.
- 4) TED's priority is the safety of all children. Certain actions serve to automatically disqualify applicants for employment or volunteer service with TED/JOM in any position that involves working with children. If the TED has direct knowledge of any offense against children, it has the right to automatically dismiss a member of the IEC or a vendor.

With respect to any relevant conviction or unfavorable behavior against children, the TED shall evaluate any applicant on an individual basis to determine whether they should be excluded from consideration based on the information. In doing so, TED shall consider the following factors: the nature and gravity of the offense; the time that has passed since the offense; and the nature of the job sought or held. All volunteers reflect the image of the Confederated Salish and Kootenai Tribes, the Tribal Education Department, and the community they represent and serve.

Approved 1/25/24