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 an environment for children that is safe 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.

The 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 the 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 age 3 through grade 12 and is one of the following:

- Is a member of a federally recognized tribe;
- Has at least ¼ or more degree of blood from a federally recognized tribe(s)*; or
- Is a descendant of at least one parent or grandparent (living or deceased) who is a member of a federally recognized tribe.

*A student can meet the ¼ or more degree blood quantum requirement through combined blood from different federally recognized tribes.

If a student's Certificate of Degree 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 ¼ 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 ¼ blood quantum from a federally recognized tribe(s), then the CDIB alone is not sufficient to show eligibility. However, 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).

Acceptable documentation for descendant students is a birth certificate(s) linking the student to the parent or grandparent who is a member of a federally recognized tribe.

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.

TED TEA OBLIGATIONS

The TED TEA is responsible for certain aspects of the JOM regulations:

1. Obtaining and updating an accurate JOM student list annually. Minimum required information for the student JOM list must include: student's first and last name, date of birth, grade level, tribal affiliation, and contact information of parent/guardian.
2. Holding at least two IEC trainings throughout the school year. Additional individualized trainings may occur.
3. Assisting the IECs with distributing the JOM Needs Assessment Survey and tallying the survey results.

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 in October. 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.

INDIAN EDUCATION COMMITTEE (IEC) MEMBERS

Any parent/guardian of a JOM eligible student who is interested in a position on an IEC must complete a background investigation with our Tribal Personnel Department. The TED also has the background investigation applications available. See pages 9 and 10 below for more information.

IEC CONFIDENTIALITY REQUIREMENTS

The TED TEAs will share the JOM student list with the IEC to determine which students are eligible to receive services provided by JOM funds. This list will only contain the student's name, parent/guardian's name, current grade level, and JOM eligibility status. The TED will not release any eligibility verification records to the IECs. The JOM student list must remain strictly confidential.

IECs will also have access to information contained in the annual parent needs assessment survey. The survey results determine the IEC's budget plan, goals, and objectives for that school year. The survey results must also remain strictly confidential.

To maintain the confidentiality of JOM student lists and the parent needs assessment survey, IEC members must:

- Keep the list and survey results in a secure physical location that only the IEC and TED employees can access. If the list or the survey results are stored digitally, they must be password protected so that only the IEC and TED employees can access them.
- Not disclose the list, survey results, or any information contained in them to any other party without written TED consent.
- Only use the list and the survey results for the purpose of providing JOM services to eligible students.
- At the end of the school year, return the list and survey results to the TED and destroy any copies.
- Notify the TED immediately if the list or the survey results are inadvertently disclosed to a third party.

IEC OBLIGATIONS

IECs are sub-contractors of the TED. The TED TEA will partner with the IEC to complete their duties and responsibilities as outlined in federal JOM regulations. IECs are 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. Each IEC member must read this Johnson O'Malley Policy Handbook.
2. IECs must complete required paperwork by committee vote and submit to the TED.
    a. By-Laws: Each IEC is governed by their individual by-laws.
    b. Budget Plan: Based on Needs Assessment Survey Priorities.
    c. Expenditures Requests: Submit all required documentation to the TEA for final approval/disapproval of funds prior to ordering and/or spending.
3. IECs must **annually** distribute a Needs Assessment Survey to **all** parents of JOM eligible students. Distribution and notification methods may include:
    a. Parent/teacher conferences
    b. School, sporting, or community events
    c. IEC meetings
    d. Phone calls
    e. Mail out
    f. Online
4. The TED will tally the Needs Assessment Survey results. These results will determine the IEC's budget plan, goals, and objectives for that school year. IEC budgets must be formatted to meet the highest priorities per your Needs Assessment Survey.
5. IECs must hold regular scheduled meetings that follow Robert's Rules of Order.
    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. IECs must 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.
7. IECs must hear grievances and requests from JOM parents related to the program.
8. IECs must communicate monthly with the TEA.

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. An IEC may amend their budget plan–anytime between August and October.

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 process will be available.

JOM DISBURSEMENTS

The CSKT TED manages JOM funds and assigns funds into each IEC's sub-account within the TED. The total award amount available to an individual IEC will be based on the verified JOM student count, 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 an IEC member made a pre-approved purchase, the TED will reimburse that IEC member. 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 "REQUEST FOR FUNDS" section 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**.

IECs may obligate some funding for the next school year as long as they have an approved plan for that funding (a plan must include a budget amount and a purpose). No more than 10% of an IEC's total budget should remain for the upcoming year's 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. IECs must submit the following documents to their TEA within five (5) working days of any purchases**:**

1. Expenditure request form
2. Questionnaire, when required
3. Invoices and/or receipts
4. Written Contract/Agreement when cost equals $500 or more and W9 from vendor

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. The Expenditure Request Questionnaire must be filled out in detail and explain how it meets your IEC's Needs Assessment.
5. Prepare a 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 the TED within five (5) working days of the expense being incurred.
7. Unless the IEC has received prior approval from the TED, all meals for meetings must be purchased through an approved vendor that will invoice the 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 IEC requesting the funds will be notified within three (3) working days about whether their expenditure request has been approved or denied.

After your TEA approves a requested expense, it may take up to two weeks to receive the check. If your TEA denies a requested expense, 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 a monthly budget report for IEC meetings. Each IEC must keep accounting records that contain:

1. Expenditure requests with all appropriate signatures.

2. Needs Assessment Questionnaire attached to request.
3. Receipts for each request or invoice.
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 TEAs are not allowed to be voting members of the IEC because this could be viewed as conflict of interest. However, TED staff who are not TEAs can be voting members of an IEC.
- Any item purchased over $100.00 with JOM funds must be kept in a neutral location, such as the school district or the TED. At no time shall the item be kept in anyone's home, and these items should be inventoried by the IEC and the 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 happens annually but has been held at different times of the year. If your budget reflects committee members' attendance at the NJOMA Conference, be aware of what year this is allocated in.

August

Projects/Meetings/Etc.	**Completion Date**
No activities	NA

September

Projects/Meetings/Etc.	**Completion Date**

TED Finalizes Previous Year's JOM Count/ Submits to BIE	Mid-September
Monthly IEC Meeting	September 30th
IEC Election of Officers	September 30th
Review/Amend IEC By-Laws	September 30th
Needs Assessment Survey Distributed to Parents	September 30th
Needs Assessment Surveys Collected/Counted	September 30th

October

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting	October 31st
Reservation-Wide IEC Training	October 31st
TED Receives Current Year's JOM Lists from Schools/ Begin Verifications	October 31st
Create/Submit JOM Budget Based on Needs Assessment Priorities	October 31st

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

The TED will notify IEC Chairpersons 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. IECs may not make any expenditures from projected Fiscal Year funds before this date without prior approval.

November

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting	November 30th

December

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting	December 31st

January

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting (if cultural observances allow)	January 31st

February

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting	February 28th

March

Projects/Meetings/Etc.	**Completion Date**
Monthly IEC Meeting	March 31st

April

Projects/Meetings/Etc.	Completion Date
Monthly IEC Meeting	April 30th
Review Budget/Planning for Remaining Funds	April 30th
Reservation-Wide IEC Training	May 31st

May

Projects/Meetings/Etc.	Completion Date
Monthly IEC Meeting	May 31st
Begin Working on Needs Assessment Survey for Next Year	May 31st

June

Projects/Meetings/Etc.	Completion Date
All JOM Funds Expended/Obligated	First week of June
Monthly IEC Meeting	June 30th

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
Indian Education Committees (IEC), Businesses, or Persons Providing Services Utilized by the Tribal Education Department (TED)

All Johnson O' Malley (JOM) IEC members agree to:

- Be conscious of the fact that everything they 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 IEC responsibilities.
- Be familiar with the written policies and procedures set forth by the TED. Any verbal direction should be followed up in an email.
- Maintain the strict confidentiality of the JOM student list, needs assessment survey results, and any other student information.
- 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 Investigation Policy

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

1) The TED will utilize the Tribal Personnel Department's individual background investigation process 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, every person is required to undergo a background investigation through the Tribal Personnel Department. Background investigations will be renewed every two years.
3) If a person has pending legal action against them, a volunteer or vendor may be asked to step down from their position or discontinue services if it can negatively affect the TED or JOM programs.
4) The TED's priority is the safety of all children. Certain actions serve to automatically disqualify applicants for employment or volunteer service with the TED and its JOM programs 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, the 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.

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Approved:10/28/2025