

1 **Polson School District**

2  
3 **FINANCIAL MANAGEMENT**

7231P  
page 1 of 8

4  
5 Federal Impact Funds

6  
7 Indian Policies and Procedures for Impact Aid

8  
9 It is the intent of the Polson School District that all American Indian children of school age have  
10 equal access to all programs, services, and activities offered in the District. It is also the intent of  
11 the District to fully comply with the requirements of Title VIII (Impact Aid 13 Program) of the  
12 elementary and Secondary Education Act and regulations relating thereto. To that end, the board  
13 has adopted as policy these Indian Policies and Procedures (IPP). The IPP, by intent and by  
14 Board action, supersede all previous Board action and are intended to bind the Board,  
15 administration, and staff of the District. Consultation will occur with the Confederated Salish and  
16 Kootenai Tribes, parents of Indian children in the District, and the Indian Education Committee  
17 in a timely manner that allows for review of, and recommendation on, relevant programs and  
18 policies. Consultations are outlined through the following policies and procedures. These  
19 policies will be in accordance with Polson School District No. 23  
20

21 Policy 2450 – 21 INSTRUCTION – Recognition of Native American Cultural Heritage with  
22 specific focus on the Salish, Pend d'Oreille and Kootenai Tribes.  
23

24 **ATTESTATIONS**

25  
26 The Polson School District attests that it has established Indian Policies and Procedures (IPPs) as  
27 required in section 7004 of the Impact Aid law for any children claimed who reside on eligible  
28 Indian lands. The IPPs have been adequately disseminated to the tribes and parents of children  
29 residing on eligible Indian lands. A copy of the current policies and procedures was attached to  
30 the FY2021 Impact Aid application.  
31

32 The Polson School District attests that it has provided a copy of written responses to comments,  
33 concerns and recommendations received from tribal leaders and parents of Indian children  
34 through the Indian policies and procedures consultation process and disseminated these  
35 responses to tribal leaders and parents of Indian children prior to the submission of their FY2021  
36 Impact Aid application.  
37

38 **Indian Policies and Procedures**

39  
40 The following Indian policies and procedures become effective upon school board approval.  
41

42 **Policy 1**

43  
44 The LEA will disseminate relevant applications, evaluations, program plans and information  
45 related to the LEA's education program and activities with sufficient advance notice by the  
46 preferred method of communication which may be standard mail, email or by sending with  
47 students, to allow tribes and parents of Indian children the opportunity to review and make

recommendations. The [34CFR222.94(a)(1)]

7231P  
page 2 of 8

### **Procedure 1**

1. To that extent, data on children within the District will be gathered throughout the school year by building principals, program directors, and administrators. This data will be provided to the District's Indian Education Coordinator in May and August of each year to be compiled into a clear, complete, and concise document in parent-friendly terms. This *Indian Education Report* will be used for planning purposes in consultation with the Tribal Education Department, for the current and upcoming school year.
2. Data will be separated into categories as follows: non-Indian students, students enrolled in federally recognized tribes Title VI students (first- and second-generation descendants), and Johnson O'Malley students (1/4 degree combined Indian blood of a federally recognized tribe).

#### Individual Data:

Individual data will include student enrollment/student counts in Title VI, Johnson O'Malley, and Impact Aid.

#### Group or Summary Data:

- Summary (statistical only) data will include free and reduced lunch counts
- Transfer in/out rates
- Attendance
- Team/club types and the associated extent of equitable participation
- Activity participation costs
- Enrollment and participation in all classes and programs
- Dropout statistics and exit interview information if available
- Disciplinary information
- Standardized test scores
- Smarter Balanced Assessment
- Grades and GPAs
- Scholarship and award recipients
- Indian Student Count, Participation in College Preparation, or Honor/AP Classes

The Title VI application will also be made available.

#### Mobility Study:

A committee will be appointed to collect data on exiting students. A process will be developed to include, when possible, statistical information relating to exit interviews, records, and follow-

1 through with all students exiting School District No. 23. Supporting records will be kept for all  
2 students.

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4  
5 7231P  
6 page 3 of 8  
7

8 Impact Aid application;

- 9 • Evaluation of all educational programs; and  
10 • Plans for education programs the District intends to initiate or eliminate.  
11  
12

13 Parents of Indian children, tribal officials, the Polson IEC, and the public will be given notice of  
14 all meetings related to equal participation or the content of the educational program by including  
15 information about meeting times and locations. The location, date and time of any meeting  
16 described above shall be posted in the same manner as a legally posted Board meeting. Monthly  
17 school board meetings are conducted the second Monday of each month in the Polson School  
18 District Office.  
19

20 The Polson School District will disseminate information by standard mail and/or email as  
21 preferred or it will be sent home with students. The District will seek timely input regarding the  
22 following programs on its educational program (including, but not limited to):  
23 Title I Part A; Title I Part C; Title I Part D; Title II, Part A; Title III, Part A; Title IV Part A;  
24 Title IV, Part B; Title V; Part B subpart 2; Title VI Part A subpart 1; Title VI-Impact Aid  
25 programs; Johnson O'Malley programming.  
26

27 The completed applications, evaluations, and program planning will be made available to parents  
28 of Indian children, Tribal officials, and the Polson Indian Education Committee. A summary will  
29 be prepared and disseminated five days in advance of public hearings held in September and  
30 October to afford all interested parties the opportunity to review the documents with sufficient  
31 time to provide thoughtful input at the public meetings. These hearings will be publicly  
32 advertised on our website, posted in area locations as part of our monthly board meetings to  
33 allow all interested parties to attend. In addition, representatives from the District and the  
34 Confederated Salish and Kootenai Tribes Indian Education Department will schedule meetings  
35 with the Tribal Council to seek their input, as well as their preferred method of communication.  
36

37 Parents of Indian children, tribal officials, the Polson Indian Education Committee and any other  
38 interested persons can review assessment data to help develop or modify educational programs  
39 and services allowing for the participation of Indian students on an equal basis in the district.  
40

41 Minutes from the Indian Education meetings will be posted on the District's website for all  
42 patrons and Tribal officials to review. This will allow for ongoing dissemination of information.  
43

## 44 **Policy 2:**

45  
46 The Polson School District will provide an opportunity for the Confederated Salish and Kootenai  
47 Tribes, Polson Indian Education Committee and parents of Indian children to provide their views

1 on the District's educational program, activities, including recommendations on the needs of  
2 children and on how the District may help those children realize the benefits of the educational  
3 programs and activities. [34CFR222.94(a)(2)].  
4

5 page 4 of 8  
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- 7 (i) Notify tribes and the parents of Indian children of the opportunity to submit  
8 comments and recommendations, considering the tribe's preference for method of  
9 communication.  
10 (ii) Modify the method of communication and time for soliciting Indian views, if  
11 necessary, to ensure maximum participation of tribes and parents of Indian children  
12

## 13 **Procedure 2** 14

15 Parents of such children and Indian tribes will be afforded an opportunity to present their views  
16 on such programs and activities, including an opportunity to make recommendations on the  
17 needs of these children and how the local educational agency may help such children realize the  
18 benefits of such programs and activities.  
19

20 The Indian Education Report will be disseminated by standard mail, as well as email to the  
21 appropriate tribal officials: The Confederated Salish and Kootenai Tribal Chairperson and the  
22 Tribal Education Department Director, and the Polson Indian Education Committee chairperson.  
23 The report will be disseminated to Indian parents and community members by email as well as at  
24 informational sharing meetings in February and August. Reports will also be distributed by  
25 making hard copies available at locations such as the Tribal Complex, Salish Kootenai College,  
26 Salish Kootenai Housing Authority, and other places deemed appropriate or upon request and  
27 also by their preferred method of communication.  
28

29 Individuals may access the report through the District web site. The information-sharing  
30 meetings may take place in community locations other than school facilities to encourage and  
31 maximize parent and community attendance. The District will email meeting dates, and items.  
32 Locations will be publicly advertised in the CharKoosta News, the Lake County Leader, the  
33 Valley Journal, the District website, and other venues as appropriate.  
34

35 Tribal officials, Confederated Salish and Kootenai Tribal Chair, the Tribal Education Director,  
36 and the Polson Indian Education Committee Chair will receive meeting notification through  
37 standard mail and electronic mail. Written comments will be accepted for two (2) weeks after the  
38 information-sharing meetings for consideration at the March and September Board meetings.  
39 Comments may be emailed or addressed to the District Indian Education Coordinator, School  
40 District No. 23 Polson, MT 59860. Indian parents and community members will provide  
41 comment and input on the status of Indian student participation in programs and activities in the  
42 District at the regularly scheduled Board meetings in March and September for planning  
43 purposes. The Board will review the District's summary response and recommendation to the  
44 documented comments, input, and recommendations. The District will consider and adhere to the  
45 preferred method of communication by the tribes and parents and will modify the method in  
46 order to ensure maximum participation.

**Policy 3**

The Polson School District will annually assess the extent to which Indian children participate on an equal basis with non-Indian children in the District's education program and activities.  
[34CFR222.94(a)(3)]

- (i) Share relevant information related to Indian children's participation in the LEA's education program and activities with tribes and parents of Indian children; and
- (ii) Allow tribes and parents of Indian children the opportunity and time to review and comment on whether Indian children participate on an equal basis with non-Indian children.

**Procedure 3**

The Polson School District will gather data from our records in regards to the ratio of Indian children compared to other children participating in academic and co-curricular programs and to be included in our yearly *Indian Education Report*.

The District will evaluate the Indian Children's equal participation in educational programs and activities. See Procedure 1, Number 2, Line 12 to line 45 on page 2, and to line 14 on page 3

Annually, the District Administrator (or a designee), administrators, staff members, the Polson Indian Education Committee, Indian parents, and Tribal officials will hold a meeting to assess the extent of Indian children's participation in the educational program. At such meeting, attendees will analyze the school data and Tribal/parental commentary to determine the extent of equality of Indian children's participation with other children.

The Polson School District will disseminate the results of the assessment of Indian participation to parents of Indian children and tribal officials within one month of publication by sending the information to the Confederated Salish and Kootenai Tribal Council and Polson Indian Education Committee via mail, email, posting at tribal offices, etc.

Parents of Indian children or tribal officials may comment on the results at regularly scheduled school board meetings, Polson Indian Education Committee meetings, directly to the school district by phone, email, in writing, etc. In addition, parents of Indian children and Tribal officials may comment in the fall and spring semester through a questionnaire requesting information concerning their views as to the extent of Indian children's participation in educational programs on an equal basis with other children.

The Polson School Board will work with Polson Indian Education Committee, parents of Indian students, Tribal officials, and staff members to assist in the modification of educational programs

1 in order to ensure the equal participation of Indian children. Such committee shall make  
2 recommendations to the Board as to any needed modifications. The Polson School Board shall  
3 give deference to the suggestions of the committee in voting on proposed modifications.

7231P

page 6 of 8

7 The Polson Superintendent, administration, and school staff, in conjunction with the Polson  
8 Indian Education Committee, will review annual survey data and comments gathered from  
9 families and students. The results of the data and its comments will be shared with all interested  
10 parties in the district. In addition, comments and/or suggestions brought forth from these  
11 conversations will become part of the Committee's approved minutes.

13 This data will be utilized to develop appropriate supports for various programs.

15 During the public hearings in September and March, the school district will gather information  
16 relating to Indian children's participation in the LEA's education programs and activities. This  
17 information will also be made available to the parents of Indian children, tribal officials and the  
18 Polson Indian Education Committee via email, posting, and at tribal offices, etc.).

20 If it is determined that there are gaps in Indian participation in the educational program or  
21 activities, the Polson School Board or designee in consultation with the Indian Education  
22 Committee (Parent Advisory Committee) and tribal officials, will modify its education program  
23 in such a way as to improve Indian participation.

#### 25 **Policy 4**

27 The Polson School District will modify the IPP's if necessary based upon the results of any  
28 assessment or input described in this document. [34CRF222.94(a)(4)].

#### 30 **Procedure 4**

32 If areas of IPP data in the *Indian Education Report* indicate review or modification of a school  
33 program or activity is necessary, a working committee made up of Indian parents, community  
34 members, and Board members, Salish/Kootenai Tribal Education Department, and Polson Indian  
35 Education Committee will be identified to engage in a review and provide recommendations for  
36 change.

38 The IEC, Parents of Indian children, and tribal officials will evaluate the recommendation and  
39 assess the effectiveness of the IPP input to the local education agency. If their assessment  
40 indicates modification of the District's Indian Policies and Procedures is necessary, a working  
41 committee made up of Indian parents, community members, and Board members will be  
42 identified to engage in review and modification of the Indian Policies and Procedures. The  
43 District School Board decides two weeks before the annual IPP meeting in September and will  
44 be implemented in the current and new school year. The District will notify the IEC Parents of  
45 Indian children and tribal officials via preferred communications as stated in earlier procedures.

**Policy 5**

The Polson School District will respond at least annually in writing to comments and recommendations made by tribes or parents of Indian children, and disseminate the responses to the tribe and parents of Indian children prior to the submission of the IPP's by the LEA. [34CRF222.94(a)(5)].

**Procedure 5**

The Polson School District will present to Tribal Council yearly in April; the *Indian Education Report*, assessment information, data, policy, procedures, programs, systems and give the Tribal Leaders an opportunity to respond and question information presented.

The Polson School will also present this same information to Tribal Education, Indian Education Committee (I.E.C.), and Parent Teacher Conferences. The school will use a perception survey to give parents and tribal leadership an opportunity to respond. We will have IPP's available for parents during the Back-To-School open houses at each school in the District.

In order to allow Indian parents and tribal officials to make commentary concerning:

1. The needs of their children and the ways in which they can assist them in realizing the benefits of the education programs.
2. The overall operation of the District's education program.
3. The degree of parental participation allowed in the same,

The District Office will provide parents of Indian children and Tribal officials a questionnaire requesting their input and recommendations in the fall and will thereafter hold an annual Board meeting where Indian parents, Tribal officials, and the Board may review such commentary. Indian parents and Tribal officials will be given notice of all meetings by including in the above-referred questionnaire to be disseminated in the fall semester information as to the location of legally posted Board notices. The location, date and time of any meeting described above shall be posted in the same manner as a legally posted Board meeting.

**Policy 6**

The Polson School District will annually provide a copy of the IPP-to the affected tribe or tribes. [34CR F222.94 (a)(6)]

**Procedure 6**

The Polson School District will offer to annually present to Tribal Council and provide a copy of the current Indian Policy and Procedures to the Confederated Salish and Kootenai Tribes by providing a copy to the Tribal Council. Polson School District will also have a copy of the current IPP's on the District's website: <http://www.polson.k12.mt.us>, and will present a copy to the Polson Indian Education Committee.

**Open Meeting**

All meetings regarding these Indian Policies and Procedures will be conducted in compliance with Montana's open meeting laws.

**GRIEVANCE PROCEDURE**

Any parent or other citizen who has a complaint concerning the actions of the Board relating to equal access of American Indian Children of school age to programs, services, and activities offered in the District may pursue their complaint through the Board's Uniform Complaint Procedure, Policy 1700. A copy of the Uniform Complaint Procedure can be obtained from the District administration office or any of the school offices. The above-outlined grievance procedure does not supersede or in any way prevent the Confederated Salish and Kootenai Tribes from pursuing a written complaint with the U.S. Department of Education, under CFR 222.102, concerning any actions of the District undertaken with respect to these Indian Policies and Procedures.

Legal Reference: 20 U.S.C.S. 7701, et seq. The Impact Aid Program Statute (Title VIII 8 of the Elementary and Secondary Education 9 Act of 1965)

34 CFR 222.94 What provisions must be included in a local ~~44~~ educational agency's Indian policies and procedures?

**Policy History:**

Adopted on: 01/21/2013

Reviewed on: 12/10/2012, 02/13/2017

Revised on: 01/13/2014, 01/12/2015, 01/11/2016, 11/13/2017, 12/09/2019, **9/2/2020**