#107 POLICIES AND PROCEDURES REGARDING STUDENTS RESIDING ON INDIAN LANDS

The Cloquet Public Schools are entitled to receive federal funds Impact Aid, based on the numbers of students who reside on Indian-owned land, whose parents work on Indian land, or whose parents work for the federal government. The funds received through Impact Aid non-categorical and become a part of the District General Fund.

It is the intent of the Cloquet School District, ISD #94 that all Indian children of school age have equal access to all programs, services and activities offered within the school district. To this end, the Cloquet School District, ISD #94 will consult with local tribal officials and parents of Indian children in the planning and development of Indian Policies and Procedures (IPPs), general education programs, and activities. These policies and procedures will be reviewed annually, and revisions will be made within 90 days of the determination that requirements are not being adequately met.

ATTESTATIONS

The Cloquet School District, ISD #94 attests that it has established Indian Policies and Procedures (IPPs) as required in section 7004 of the Impact Aid law for any children claimed who reside on eligible Indian lands. The IPPs have been adequately disseminated to the tribes and parents of children residing on eligible Indian lands. A copy of the current policies and procedures was attached to the FY 2022 Impact Aid application.

The Cloquet School District, ISD #94 attests that it has provided a copy of written responses to comments, concerns and recommendations received from tribal leaders and parents of Indian children through the Indian policies and procedures consultation process and disseminated these responses to tribal leaders and parents of Indian children prior to the submission of their FY22 Impact Aid application.

Section 7004 of the Impact Aid Law, requires that the LEA establish policies and procedures to ensure that: 1) tribal officials and parents of Indian children are given the opportunity to comment on the participation of Indian children on an equal basis in the school program with all other children educated by the LEA, 2) the LEA disseminates documents dealing with educational programs to tribal officials and parents of Indian children, 3) the LEA consults and involves tribal officials and parents of Indian children in planning and developing educational programs assisted by funds.

These policies and procedures are to be reviewed annually by the LEA to ensure that they meet the minimum standards of Section 7004 of the Impact Aid Law and that they continue to provide for an adequate level of Indian participation.

The Indian tribe has the right to file a complaint regarding these policies and procedures as outlined in 34 CFR 222.102-113.
A. STUDENT PARTICIPATION

Policy

It is the position of the Cloquet School District that children enrolled in ISD 94 shall have equal opportunity to participate in all aspects of the school program and shall not be excluded based on their race or location of residence. This participation inclusion shall be communicated via email.

Cloquet School District will, at least annually, assess the extent to which Indian children participate on an equal basis with non-Indian children in the LEA’s education program and activities. As part of this requirement, the LEA will:

1) 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

2) 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

1) To assess the extent of participation in all school programs, the Indian Education staff quarterly compiles data on participation of Indian students. These are included in the agenda packet of the LIEC parent meetings scheduled for October, January, April and July. A school administrator and School Board member are ex-officio members of the committee.

2) There is an Indian Education staff person assigned to each building who works to encourage Indian students to participate fully in school programs. The LIEC helps support this by earning funds to assist families in need by buying supplies or materials.

3) The school administration, LIEC committee members and parents will review the school programs annually to determine if all children have equal access to programs and participate on an equal basis in November. One week prior to the November meeting a notice will be sent to families regarding how to provide comment on the equal participation analysis including a program summary and how to receive a full copy.

4) The Cloquet School District will take the following measures to annually assess the extent to which Indian children participate on an equal basis with non-Indian children in the Districts education program and activities.

   a. The Cloquet School District shall annually calculate from its records the ratio of Indian children compared to non-Indian children participating in all academic and co-curricular programs.

   b. If it is determined that there are gaps in Indian participation in the educational programs or activities, the Cloquet School Board in consultation with the LIEC, tribes and the parents of Indian children, will modify its education program in such a way as to improve Indian participation.
If upon review of the program by administration, tribal officials, or LIEC (Parent Committee members) it is found that Indian children are not allowed to participate on an equal basis, a task force comprising of three (3) LIEC members, one (1) administrator, one (1) tribal official and two (2) parents will review the program and make recommendations to the Superintendent of Schools on modifying the program to assure participation on an equal basis. Recommendations can be made at monthly LIEC meetings. Meeting agendas and materials are prepared one week in advance and emailed to members. Hard copies are available during meetings or upon request.

B. DISSEMINATION OF MATERIAL

Policy

Cloquet Public Schools must disseminate relevant applications, evaluations, program plans and information related to the Cloquet Public Schools educational program and activities with sufficient advance notice to allow tribes and parents of Indian children the opportunity to review and make recommendations.

It is the policy of the Cloquet School District to inform parents of students living on tribal land and tribal officials of Impact Aid application, evaluations of educational programs assisted with 81-874 funds; and program plans for educational programs the LEA plans to initiate/eliminate.

The Cloquet Public Schools consider the funds received from Impact Aid to be General Fund monies and not categorical aid. The monies are used for programs to benefit all on an equal basis.

Procedure

1) In January of each school year, a public hearing will be held to review Impact Aid applications, current educational opportunities/programs assisted with Impact Aid funds and programs that are being reviewed for possible initiation or elimination. During Tribal Consultation in August the District will consult the tribe on their preferred method of communication. The local LIEC will modify the method of communication and time to insure maximum meeting participation. Notification of the hearing will be sent to tribal officials and LIEC members in late October at least one (1) week prior to the hearing via email. The notification will include information on equal participation analysis and current Indian Policies and Procedures.

2) Notice of the January hearing will be included in the School Bulletin emailed home to all parents. A summary of the documents to be discussed with instructions on how to get a complete document copy through email one week in advance.

3) The Board holds an Open Hearing, November of each year, where it is possible for tribal officials and parents of Indian children to comment on education programs.

4) Standardized test data is published annually in the local paper.
5) Prior to September 1 of each year, all district households will receive a copy of the P.E.R. (Planning, Evaluating, and Reporting) report which will summarize district goals and the evaluation of those goals. Parents and tribal officials will be given the opportunity to participate on the P.E.R. Committee.

C. CONSULTATION AND INVOLVEMENT

Policy

Provide an opportunity for tribes and parents of Indian children to provide their views on the LEA’s educational program and activities, including recommendations on the needs of their children and how the LEA may help those children realize the benefits of the LEA’s educational programs and activities as part of this requirement the LEA will:

1) Notify tribes and the parents of Indian children the opportunity to submit comments and recommendations, considering the tribe’s preference for method of communication, and

2) Modify the method of and time for soliciting Indian views, if necessary, to ensure maximum participation of tribes and parents of Indian children.

The Cloquet School District will provide an opportunity for the Tribe and parents of Indian children to submit their comments and recommendations on the District’s educational program and activities, including recommendations, proposed solutions and preferred methods of communication. Published notice and summary data will be distributed via email and will be included one week prior to the open meeting. Opportunities to give comment on procedures described below are to be sent out by email one week prior to the meetings.

Procedure

1) There are regularly scheduled parent-teacher conferences, K-12, which all parents are encouraged to attend. The Indian Education staff makes an additional effort to encourage parents of Indian students to attend.

2) At the Senior High, parents meet with their child’s advisor to register for the following year’s classes.

3) Parents are involved on district-level committees which focus on educational concerns.

4) An administrator and School Board member from the school district serves as an ex-officio member of the LIEC. At these meetings, the educational needs of Indian students are discussed, and parents are given the opportunity to make recommendations.

5) The LIEC appoints one of its members, elected from Indian parents, to attend School Board meetings on a regular basis.
6) The Indian Education staff conducts a needs assessment for Title IV-A, approximately every four years. The parents of Indian students express their concerns and recommendations about the school program through this process.

7) The tribe can submit their preference of communication to the LIEC by October 1st.

8) IPP’s will be emailed to LIEC members one week in advance of the November hearing.

9) All families can attend meetings to provide recommendations regarding the needs of their children as well as programmatic concerns. The local dissemination of policy will take place on an annual basis in November.

10) The Tribe prefers all meeting notices, reports and communication with the tribe and parents of Indian children be disseminated via email and website notifications.

Once the preferred method of communication has been decided, the tribe and parents of Indian children communication will be used throughout the consultation process. Any changes to the method will happen through additional consultation with tribes and parents. The LEA will, to the greatest extent possible, take the tribe’s preferred method of communication into consideration for all correspondence with the tribe and the parents of Indian children.

11) If the consultation and participation of Indian parents is low the Indian Education Director will consult families on potential meeting time changes.

D. MODIFICATION OF RECOMMENDATIONS

Policy

The Cloquet School District will modify the IPPs if necessary, based upon the results of any assessment or input described in this document.

Procedure

1) The LIEC will hold an annual hearing in November, the location and time to be announced in the local newspapers. The annual hearing will receive and evaluate comments regarding changes of the IPP’s. The local Indian Education Director will facilitate and evaluate all recommended changes to the district IPP’s. Changes to the IPP’s will be presented to the local school board who then will determine if changes need to be made. A notice with a copy of the IPP’s will be emailed one week prior to LIEC members to communicate their opportunity to provide comment. Any changes to the IPP’s will be made 30 days after adoption.

2) The Cloquet School District will disseminate copies of the revised IPPs to the tribe and parents of Indian Children by email and posted on website withing 30 days of adoption by the Cloquet School Board.
3) If the consultation participation by parents of Indian children and tribes is low, the Cloquet School District will re-evaluate its consultation process. Specifically, the Cloquet School District will take the following measures to improve or enhance participation:
   a. Consult with parents of Indian children and tribes
   b. Change communication method
   c. Change time of meeting
   d. Offer virtual attendance

E. RESPONSE TO TRIBES AND PARENTS FROM COMMENTS AND RECOMMENDATIONS

Policy

The Cloquet School District will respond at least annually in writing to comments and recommendations made by the tribes or parents of Indian children, and disseminate the responses to the tribe and parents of Indian children prior to the submission of the IPPs by the LEA.

Procedure

1) Return communication via email to the LIEC will take place 30 days following school board policy revisions. Any changes to policy approved by our local school board will be implemented 30 days following approval. The School District will at least annually respond in writing to comments and recommendations made by the LIEC, tribal officials, or parents of Indian children, and disseminate the responses to all parties by email prior to the submission of the IPP’s by the District.

F. COPY OF IPPS TO TRIBE(S)

Policy

The Cloquet School District will provide a copy of the IPPs annually to the affected tribe or tribes.

Procedure

1) The School District will annually provide a copy of the current Indian Policies and Procedures to the tribe by email prior to the submission of the Impact Aid Application in January.