

## MEMORANDUM

---

**TO:** NWABSD Board of Education  
Members

**DATE:** December 05, 2023

**NUMBER:** 24-056

**FR:** Office of the Superintendent

**SUBJECT:** Approval of Current  
Indian Policies and  
Procedures

### **STRATEGIC PLAN/BOARD GOAL:**

Improve Stakeholder Communication.

### **ABSTRACT:**

Board approval of the District's Indian Policies and Procedures (IPP) as required each year per Impact Aid Regulations.

### **ISSUE:**

At issue is the approval of amended Indian Policies and Procedures as required each year per Impact Aid regulations.

### **BACKGROUND AND/OR PERTINENT INFORMATION:**

Each year, the Northwest Arctic Borough School District submits the Impact Aid Application to the U.S. Department of Education. The annual application requires the submission of updated Indian Policies and Procedures. The IPP is revised and renewed after consultation with regional Tribal leaders and parents of impacted communities. The IPP meets the established federal requirements according to Section 7004 of the Impact Aid Law.

### **ALTERNATIVES:**

1. Approve the amended Indian Policies and Procedures as presented;
2. Disapprove amended Indian Policies and Procedures as presented;
3. Take no final action.

### **ADMINISTRATION'S RECOMMENDATION:**

The administration recommends the Board approve the amended Indian Policies and Procedures as presented.

## E 6174.1 INDIAN POLICIES AND PROCEDURES

The Northwest Arctic Borough School District's goal under the Indian Policies and Procedures [IPP] is to ensure that all American Indian children of school age have equal access to all programs, services, and activities provided by the school district.

The District will establish policies and procedures to ensure that children residing on Indian lands participate in programs and activities supported by impact aid funds on an equal basis with all other children. Parents of these children will be provided an opportunity to present their views on these programs and activities, including the chance to make recommendations on the needs of those children and how the District may help these children realize the benefits of these programs and activities. Parents and Indian Tribes will be consulted and involved in the planning and development of these programs and activities. The relevant applications, evaluations, and program plans will be disseminated to the parents and the Indian Tribes.

It is the intent of the District to fully comply with all requirements of Title VIII (Impact Aid Program) of the Elementary and Secondary Education Act of 1965 (formerly [Public Law 81-874](#), amended 8/2/02), [34 CFR 222.94](#), and to that end, the Governing Board has adopted as policy these Indian Policies and Procedures (IPPs). The IPPs by intent and by School Board action supersedes all previous School Board action and are intended to bind the Governing Board, administration, and staff of the District.

### ATTESTATIONS

The Northwest Arctic Borough School District 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 FY25 Impact Aid application.

The Northwest Arctic Borough School District 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 FY25 Impact Aid application.

### POLICIES AND PROCEDURES

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

**POLICY 1:** The Northwest Arctic Borough School District will disseminate relevant applications, evaluations, program plans, and information related to the District's education program and activities with sufficient advance notice to allow tribes and parents of Indian children the opportunity to review and make recommendations.

#### **Procedure 1:**

The District Administrator/designee will, as soon as reasonably possible after such information becomes available, but no later than one week in advance of any meeting, to Indian parents and Tribal officials a copy of the following documents by preferred method:

Impact Aid Current Fiscal Year application (full application will be sent out by email)  
Indian Policy and Procedures and  
Evaluation of all educational programs; and  
Plans for education programs the District intends to initiate or eliminate.

In addition, information regarding these materials will be included in the District's monthly newsletter, if appropriate.

Parents of Indian children, tribal officials, and the public will be given notice of all meetings related to equal participation or the content of the educational program by including information about meeting times and locations in the questionnaire to be disseminated in January of each school year. The location, date, and time of any meeting described above shall be posted in the same manner as a legally posted School Board meeting.

The District will disseminate information and seek timely input and meaningful consultation with all Tribes regarding the following programs on its educational program (including, but not limited to): Title I, Part A, Title I, Part C, Title I, Part D, Title II, Part A, Title III, Part A, Title IV, Part A, Title IV, Part B, Title V, Part B subpart 2, Title VI, Part A, subpart 1, Title VII-Impact Aid programs, and Johnson O'Malley programming.

The completed applications, evaluations, and program planning will be made available to parents of Indian children through their preferred contact information, which is available in the District's student information system.

Tribal officials and the Indian Education Committee will receive a prepared summary of all materials, which will be disseminated (per Tribal preferred contact method) one week in advance of public hearings held in January and April (to afford all interested parties the opportunity to review the documents with sufficient time to provide thoughtful input at the public meetings. These hearings will be publicly advertised by radio, advertisement, newsletter, or in writing to allow all interested parties to attend. In addition, representatives from the District and Indian Education Committee will schedule meetings with the local tribe to seek input.

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

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

**POLICY (2):** The Northwest Arctic Borough School District will provide an opportunity for the affected tribe or tribes and parents of Indian children to provide their views on the District's educational program and activities, including recommendations on the needs of their children and on how the District may help those children realize the benefits of the educational programs and activities.

(i) Notify tribes and the parents of Indian children of the opportunity to submit comments and recommendations, considering the tribe's preference for a method of communication and

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

**Procedure 2:**

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; and (3) the degree of parental participation allowed in the same, parents of Indian children and Tribal officials will receive via the preferred method of contact a questionnaire requesting their input and recommendations during January of each school year and will thereafter hold an annual Board meeting where any such commentary may be reviewed by Indian parents, Tribal officials, and the School Board.

Indian parents and Tribal officials will be given notice of all meetings by including in the above-referred questionnaire to be disseminated in January of each school year information as to the location of legally posted School Board notices. The location, date, and time of any meeting described above shall be posted in the same manner as a legally posted School Board meeting, and all meetings are open to the public.

Once the preferred method of communication has been decided, the tribe and parents of Indian children communication method will be used throughout the consultation process. Any changes to the method will happen through additional consultation with tribes and parents. The District 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.

Tribal communication preferences are as follows:

Tribe	CONTACT METHOD	MATERIAL DELIVERY
Native Village of Ambler		Molly Brown Eva Henry
Primary	(907) 445-2030	<a href="mailto:nativevillageofambler@gmail.com">nativevillageofambler@gmail.com</a> <a href="mailto:nativevillageofambler@ivisaappaat.org">nativevillageofambler@ivisaappaat.org</a>
Secondary		
Native Village of Buckland		
Primary	Mona @ 494-2121 After 1pm	tribeadmin@nunachiak.org or cityofbucklandalaska@gmail.com
Native Village of Deering		
Primary	(907) 363-2138	tribeadmin@ipnatchiaq.org
Native Village of Kiana		
Primary	(907) 475-2109	tribedirector@katyaaq.org
Secondary		
Native Village of Kivalina		
Primary	(907) 645-2201	tribeadmin@kivaliniq.org
Native Village of Kobuk		
Primary	tribeclerk@laugvik.org	tribeclerk@laugvik.org
Secondary	(907) 948-2217	
Native Village of Kotzebue		
Primary	(907) 442-3467	christina.hensley@qira.org
Secondary		kotzebueira@gmail.com
Native Village of Noatak		
Primary	(907) 485-2173, (907) 485-2005	tribeadmin@nautaaq.org
Noorvik Native Community		
Primary	(907) 636-2144	tribemanager@nuurvik.org
Secondary		P.O. Box 209, Noorvik, Alaska, 99763
Native Village of Selawik		
Primary	(907) 484-2165	tribeadmin@akuligaq.org
Secondary		P.O. Box 59 Selawik, AK, 99770
Native Village of Shungnak		
Primary	(907) 437-2163 437-2304 (Kathy Custer)	tribeadmin@issingnak.org

If the consultation participation by parents of Indian children and tribes is low, the Northwest Arctic Borough School District will re-evaluate its consultation process. Specifically, the District will take the following measures to improve or enhance participation:

- Consult with parents of Indian children and tribes
- Change communication method based on consultation
- Change the time of meetings

The Indian Education Committee (Parent Advisory Committee) of the District will meet in April of each school year for the purpose of addressing comments and concerns of parents of Indian children regarding the District's educational programs and activities. The meeting agendas shall be posted, and all meetings shall be open to the public allowing for tribal officials as well as parents of Indian children the opportunity to submit comments and recommendations for consideration.

A school board representative is a non-voting member of the Indian Education Committee (Parent Advisory Committee). This representation allows for the discussion of the needs of the students and ideas to be brought forward to both the Indian Education Committee as well as the School Board.

At each of the regularly scheduled school board meetings, a section of time is set aside for communications from the public. This is a time to offer comments and suggestions regarding programming for Indian students. In addition, two public hearings are scheduled in January and April, which are specifically devoted to addressing questions regarding federal programs. Based upon suggestions, preferred methods of communication, as well as ways to maximize participation from tribal officials as well as parents of Indian children will be seriously considered.

Information will be included in student handbooks/enrollment packets regarding opportunities to provide input to the District.

The District and Indian Education Committee representatives will schedule meetings with the affected tribe or tribes to discuss ongoing programming goals.

**POLICY (3):** The Northwest Arctic Borough School District will annually assess the extent to which Indian children participate on an equal 6174.1 basis with non-Indian children in the District's education program and activities.

(i) Share relevant information related to Indian children's participation in the District'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 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 District's education program and activities.

- The District will monitor and calculate the ratio of Indian student participation in all academic and co-curricular activities annually based on school district data. Student participation in co-curricular activities is monitored through the District's Student Information System.
- The District will share its assessment of district funding, Indian student participation, related academic achievements, and other related data with the parents of Indian children and tribal officials through preferred contact methods, posting at tribal and school offices, and on the district website. This information will be shared at least one week in advance of any meeting.
- Parents of Indian children, tribal officials, and other interested parties may express their views on participation through direct communication with the school district, at any regular school board meeting which are held bi-monthly, and during the Indian Education Committee (Parent Advisory Committee) meetings, which are held in January and April of each school year. All meetings are open to the public, and official minutes are maintained as part of the public record.
- Annually, the District Administrator (or a designee), administrators, staff members, the Indian Education Committee (Parent Advisory 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. This information and any reports will be made available to the parents of Indian children, tribal officials, and the Indian Education Committee (Parental Advisory Committee) via the preferred method at least one week in advance. They will publicly be available on the District's website.

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

**POLICY (4):** The Northwest Arctic Borough School District will modify the IPPs if necessary, based upon the results of any assessment or input described in this document.

**Procedure 4:**

The Northwest Arctic Borough School Board will schedule meetings in January and April to discuss the content of the IPPs, equal participation, and educational program and activities. Parents of Indian children and tribes will be notified via preferred method, email, and notification will be posted on the District's website regarding these meetings and the ability to submit comments.

The Northwest Arctic Borough School Board, in coordination with Indian Education Committee (Parent Advisory Committee) will evaluate all recommendations for any changes based on the result of assessment from all relevant input received and will make a determination of all recommended revisions.

The revised IPPs will become effective immediately upon adoption by the full School Board. The School District will disseminate copies of the revised IPPs to the Tribes and parents of Indian children via preferred method, email, and the revised policy will be publicly available on the District's website within 30 days of adoption by the Northwest Arctic Borough School Board.

**POLICY (5):** The Northwest Arctic Borough 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 IPPs by the District.

**Procedure 5:**

The Northwest Arctic Borough School District will annually keep track of and assemble all comments and suggestions received through the various consultation processes. All received comments will be collected, stored, and analyzed by the Department of State of Federal Programs with consultation from other appropriate district leadership.

The Northwest Arctic Borough School District will at least annually respond in writing to comments and recommendations made by tribes or parents of Indian children, and disseminate all responses per preferred communication method to all parties and information will be made through official School Board announcements prior to the submission of the IPPs by the District.

**POLICY (6):** The Northwest Arctic Borough School District will provide a copy of the IPPs annually to the affected tribe or tribes.

**Procedure 6:**

The District will annually provide a copy of the current Indian Policies and Procedures to each local tribe via the identified preferred contact method (listed above).

**Affirmation of Meaningful Consultation**

Upon signing, the Tribal Official agrees that timely and meaningful consultation occurred for the 2024-2025 school year and that the Northwest Arctic Borough School district provided the opportunity to provide input and to contribute to the school district's ESEA programs listed under Policy 1 of this document. (as applicable).

APPROVED BY:

---

Sign & Print Name: Tribal Official

Dated

---

Sign & Print Name: Superintendent

Dated

---

Sign & Print Name: School Board President

Dated