HO-CHUNK NATION
JOHNSON O'MALLEY PROGRAM
POLICY MANUAL

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JOM Goal Statement

It is the goal of the Ho-Chunk Nation JOM Division to ensure each area served by the JOM Grant complies with Federal Regulations to ensure continued funding of the grant and to ensure each student enrolled in the program receives fair and equitable treatment and consideration for the program funds.

This manual will provide guidance for the Indian Education Committees to follow when developing their by-laws and assist in the conduct of business in their respective areas. This manual will also provide the Ho-Chunk Nation JOM Division staff with their Standard Operating Procedures to maximize their ability to provide service to the Native Students, the Committees and ensure compliance with the terms of the Contract to ensure continued funding.

The Consolidated Tribal Government Program of the Ho-Chunk Nation will provide learning experiences for eligible Indian students by implementing educational programs designed to improve cultural awareness, attendance and grade point average, decrease tardiness and increase extra-curricular involvement.

Each local JOM Committee from each of the Ho-Chunk Nation Communities approved the following supplemental educational opportunities for eligible JOM students that would not otherwise be provided:

- ***Educational Support Expenditure Plan;***
- ***Cultural Awareness Expenditure Plan; and***
- ***Administrative Expenditure Plan.***

SECTION I: ELIGIBILITY CRITERIA

[25 CFR. 2 (j). 273.12]

273.12 ELIGIBLE STUDENTS

The eligibility criteria include students who:

- Are three (3) years by October 1st, through grade 12, except those who are enrolled in Bureau or sectarian operated schools;
- Are the descendant (child or grandchild) of a member of a federally recognized tribe;
- Are enrolled in a federally recognized tribe or are at least ¼ or more degree of Indian blood.

SECTION II: JOM STUDENT LIST

1) **A listing shall be made of all students who sign up during open enrollment and who meet the eligibility requirements detailed in SECTION II of this manual and are enrolled in a public school, including public pre-schools and head start programs that are specifically affiliated with that area's public school district. In some cases enrolled in a charter school, and have also registered for services with an Indian Education Committee. This list shall be provided to the HCN JOM/Education Department by the 3rd Friday in September.**

2) Budget allocations to the various IEC's are determined by the student list (head count) for each IEC.

3) **Open enrollment** for the JOM Program will take place every beginning of the school year from **August 1 thru the third Friday of September.**

4) IEC's will make public announcements, mailings, or other notifications to affected parents to optimize program enrollment.

5) JOM Program staff will produce an **enrollment form** for use in registering participants for the program.

a) These forms **if they have been modified or updated since the previous enrollment period** will be mailed to the IEC Secretary no later than July 15, by the JOM Staff.

b) These forms will be standardized for use by all IEC's. Copies, faxes or other reproductions may be accepted as valid enrollment forms for the purpose of registering participants for the JOM Program.

c) Enrollment forms will be completed by **all** participants. Participants when initially enrolling will be required to submit proof of eligibility. It is the responsibility of the parents/guardians and the IEC officers conducting enrollment to physically verify eligibility. **Proof of eligibility must be written or physically tangible, meaning it can be seen, copied and filed.**

d) Proof of eligibility and enrollment forms will be kept on file by the **HCN** JOM Program staff and the IEC **S**ecretary. Once on file, for the participant **will not have to provide proof of Tribal Eligibility** for subsequent years of participation unless they move to a new school district (IEC coverage area). Each participant must still complete an annual enrollment form.

e) The JOM Program staff (copies) and the IEC secretary (originals) will keep all enrollment forms including proof of eligibility in Program files.

6) Students shall be included in the IEC's student listing (head count) **in the area in** which he/she/they **will attend school**.

7) IEC student listings (head counts) may be amended throughout the year, as students/families relocate. However, the budget for the IEC's will stay the same, based on the original counts submitted *for that year*.

8) The **IEC Officers** will ensure that no participant is counted twice. **This will be verified by the JOM Program staff.**

9) The IEC chairperson will ensure that the final student list (head count) for his/her IEC is submitted to the **HCN JOM Program Staff by the October 1st deadline.**

10) JOM Program Registration form composition (at a minimum):

a) **Date of Application**
b) **Student Sex**
c) **Student Name**
d) **Student Age**
e) **Student Date of Birth**
f) **Student Tribal Affiliation**
g) **Student Tribal Enrollment Number**

h) **Student School Name**
i) **Student School District**
j) **IEC that Student is a Participant of**
k) **Student's Parent/Guardian Name**
l) **Student's Parent/Guardian Phone Number**
m) **Student's Parent/Guardian Address w/ City, State and Zip Code**
n) **Verification by two (2) IEC officer signature**
o) **Other information as deemed necessary by the JOM Program staff**

11) Student list (head count) composition:

a) **IEC Name as header**
b) **School Year that the List represents (August, XXXX – June, XXXX)**
c) **Student Name w/ last name first and first name last**
d) **Listed in alphabetical order by first letter, etc. of last name.**
e) **Name of Parent/Guardian/Contact and Contact Information including address and if and whenever possible, phone number and email address.**

SECTION III: STRATEGIC PLANNING

[The Annual Needs Assessment]

Annual Needs Assessment

1) 25 CFR Sections 273.16 (v) (b) (2) requires that the recipients of JOM Program funding "Make an annual assessment of the learning needs of Indian children in the community affected."

2) The IEC's will conduct an annual needs assessment during the final quarter of the current school year to determine needs for the upcoming school year.

   a) The IEC's will conduct the annual needs assessment during the final quarter of the current school year and have them completed by June 15th of that year.

3) **Needs Assessment Definition:** a process designed to gather information about the specialized and unique educational and culturally related needs of eligible Indian students. The results for the survey will be used to develop the goals and objectives for the JOM Program. A needs assessment is a determination of what the actual needs are of an organization, a group or individual. A need is defined as a "condition or discrepancy" from the norm. It can be based upon on either **subjective** (something thought to exist) or **objective** (something that actually exists) information. Clear, objective, quantifiable data is preferable in determining needs.

4) The Annual Needs Assessment will be the tool that is used by the IEC's in determining the allocations of funds within **their Education Plans**. **The Education Plan determines where funds are placed within the** IEC budgets **specifically in the areas of** Cultural Awareness, Education Support, Administration, and Incentives **as determined by the Needs Assessments of each area**.

SECTION IV: EDUCATION PLAN

1. The Educational Plan is the written document which outlines the plans for providing programs to meet the unique and specialized needs of Indian students. It is developed **by** the IEC's. It identifies needs of the Indian students, the goals and objectives to be accomplished, procedures to be followed, methods to be used in evaluating the program as well as proposed budgets and is submitted as part of the contract.

2. The Educational Plan will include, at a minimum:

   a) Educational goals and objectives which adequately address the educational needs of Indian students to be served by the contract **and a method to measure the success or failure of the plan so that appropriate steps can be taken to correct the deficiencies that are noted.**

   b) Incorporate the program or programs developed by the IEC's.

   c) Procedures for the hearing grievances from Indian students, parents, community members, and tribal representatives related to the programs contracted. Such procedures shall provide for the adequate notice of the hearing.

   d) Identify established standards and requirements which shall be maintained in operating programs and services contracted.

   e) Describe how the standards and requirements will be maintained.

   f) Outline procedures of administrative and fiscal management to be used by the JOM Program staff if these do not already exist.

   g) State the eligible Indian enrollment-total and classification by tribal affiliation(s) and by age and grade level.

4) The Education Plan will also have as major headings/inclusions:

a) **Education Support Work Plan** that will at a minimum contain:

i. A plan that is created to guide the student's academic readiness enhancement activities by assisting with the supplemental cost of basic and unique educational needs.

b) **Cultural Awareness Work Plan** that will at a minimum contain:

i. A plan that is created to develop and foster cultural awareness in the local community and school districts to reinforce tribal identity in Indian students.

ii. Assessment plan for determining cultural awareness aptitude and other relevant identity issues in the local community and school districts.

c) **Administration Work Plan** that will at a minimum contain:

i. A plan that is created to provide reimbursement and payment for meeting expenses, based on a percentage basis, incurred by the IEC's in carrying out their JOM Program duties.

5) The Education Plan as well as the included Educational Support, Cultural Awareness and Administration Work Plans must be based solely on the facts and finding of the **Annual Needs Assessment**.

6) **A** copy of the Educational Plan will be maintained in the JOM Program files located in the Johnson O'Malley & Pre K – 12 Grant Programs offices. **The original and a copy must also be kept by the IEC Secretary and readily accessible to all officers and parents. This copy should be periodically reviewed by all members of the IEC to ensure they are acting in a manner consistent with their Plans.**

SECTION V: Budget Process

Budget Calculation

1. The budget is calculated each year by the Education Designee and the total annual available funding level for each IEC is calculated based upon the approved head count which must be given to the JOM Staff by **September 30th** of each year.
2. Once the approved head count has been established, the annual funds that are available that year are divided equally to each approved student. The numbers of

approved students in your IEC area determine the funding level for your IEC that year.

3. Once an IEC's budget has been calculated and the JOM staff has distributed that information to the IEC, the IEC will determine how it will use their money. This must be based upon your IEC Approved Education Plan as determined by your areas Needs Assessments.

Unexpended Funds

1. Any funds that are not used by an IEC or are not planned to be used by June 30th of each school year will be pulled back into a general fund which is maintained by the Contractor.
    a) Funds that are remaining in the Contractor's general fund will be redistributed the following school year to support each IEC until their new budget monies are made available from the Federal Government in October. These are commonly referred to as "Start up Budgets".
        I. The Start up Budget is calculated by taking the IEC's approved master student list from the current school year and subtracting the graduates from the list.
        II. The Contractor allocates $50.00 from the Contractor's general fund for each student remaining on the IEC's master student list.
        III. Those funds will then become the "Start up Budget" to allow each IEC to operate in the new school year.
        IV. When the actual numbers are able to be determined by the process outlined above (**Budget Calculation**), each IEC's new annual budget will be adjusted to reflect the correct dollar amounts.

Restricted Expenditures

Any funds an IEC receives through its own fundraising efforts are not subject to the conditions of this Contract.
Each IEC approves its own expenditure based upon its own unique needs; however, some things cannot be purchased with Federal funds. The following is a listing of expenditures that are not allowable.

1. Federal Funds made available under this Contract cannot be "Donated" or given as charitable contributions.
2. Another factor to be taken into consideration when planning activities is to ensure that Johnson O'Malley funds are used to support existing programs (supplemental) and not replacing programs that are being provided by another funding resource (supplanting).

i. **Supplemental Programs** – Programs that support and are in addition to existing programs in the public schools. Johnson O'Malley funds **cannot** be used to

replace existing programs but may be used to support or enhance the regular school programs.

ii. **Supplanting Programs** – Supplanting means establishing or building programs using Johnson O'Malley funds which the school should already be providing from their regular budget. Johnson O'Malley funds **cannot** be used to replace funds which should be provided for existing programs. Supplanting is not legal in Johnson O'Malley programs.

ITEMS NOT ELIGIBLE

a. Non-school related expenses (sports equipment, fees, etc. pertaining to activities that are not sponsored and run through the local school-district)
    i Examples:
        1 AAU Basketball fees and equipment
        2 Club-related sports (Soccer, Swimming, Hockey, etc.)
b. Class Rings and other class memorabilia
c. College class tuition (Concurrent Enrollment Fees)
d. Field trips for extracurricular activities that only include a select number of students and not offered to all eligible JOM students in grade level
e. Home School Costs
f. Portrait Packages
    i Senior Pictures
    ii School Pictures
g. No Student Cash awards are allowed

SECTION VI: GOALS AND CATEGORICAL OBJECTIVES

JOM Goal Statement

The Consolidated Tribal Government Program (#CTF55T43984) of the Ho-Chunk Nation will provide unique learning experiences for eligible Indian students by implementing educational programs designed to improve the effectiveness of the IEC's Educational Plans.

Categorical Objectives

Budgetary constraints and/or IEC goals and objectives may limit each IEC in using any of the following (3) three objectives.

Educational Support Objective

By **September 30** of the current school year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars for Educational Support Costs that will assist with the supplemental cost of basic and unique

educational initiatives for each eligible JOM student to enable them access academic readiness enhancement as detailed in the IEC Educational Plan.

Cultural Awareness Objective

By **September 30** of the current school year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars for Cultural Awareness Costs that will create and foster cultural awareness in the local community and to reinforce tribal identity for each eligible JOM student as described in the IEC Educational Plan.

Administrative Objective

By **September 30** of the current school year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars or Administrative Costs that will provide reimbursement and payment for meeting expenses incurred by the JOM Committee(s) to enable them to carry out their JOM duties as described in the IEC Educational Plan.

SECTION VII: PARENT & OFFICER TRAINING & NATIONAL JOM CONFERENCE

1) JOM Program **will plan and conducting Officer Training annually. The IEC Officers are responsible for attendance at the training and wherever necessary, for providing instruction and presentations to the parents in their areas. The JOM Program Staff can provide assistance and support for this training at each location at the request of the IEC**.

    a) The National Johnson O'Malley Conference takes place during September each year. When funding is available and there is sufficient interest, IEC officers and parents may be able to attend this conference. The interaction with other JOM committee members around the country is considered very educational and enlightening. Because funding is limited and because it takes place during the school year, student attendance will not be encouraged or funded by the JOM Program. You must be a parent or legal guardian of a child that is registered for benefits with a recognized IEC.

2) Attendees at the National Johnson O'Malley Association Conference will also be required to present on a topic of interest **at any IEC meeting that requests them or at any trainings conducted by the JOM Staff. IEC members and Officers that attend the NJOMA conference will not be eligible to attend during subsequent years while there are those interested and willing to attend that have not previously attended the NJOMA conference. This is to ensure that**

we can maximize the opportunity for attendance by everyone to at least one meeting.

SECTION VIII: INDIAN EDUCATION COUNCIL (IEC) ORGANIZATION & MEETINGS

1) The IEC's are established to meet the Johnson O'Malley Program requirement of maximum Indian participation as stated in 25 CFR, Section 273.4.

2) The IEC's involvement is a prerequisite to providing meaningful parent participation in all aspects of educational programming, development, and implementation.

    a) Parent participation enhances program responsiveness to the needs of those served and allows them the opportunity to determine and affect the desired level of educational achievement and satisfaction which education can and shall provide.

3) The IEC officers **may** include:
    a) **Chairperson**
    b) **Vice-Chairperson**
    c) **Secretary**
    d) **Treasurer**

    Chairperson responsibilities are to:

    i. Preside over all duly called meetings using simple Parliamentary Procedure.

    ii. Participate in duly called sub-committees.

    iii. Participate and take the leadership role in the program needs assessment process.

    f) Vice-Chairperson responsibilities are to:

    i. Assist the Chairperson in performing their assigned duties and responsibilities.

    ii. Act as the Chairperson, Secretary, Treasurer if he/she is not in attendance and become the Chairperson if the office is vacated.

    g) Secretary responsibilities are to:

i. Serve as the Vice-Chairperson or Chairperson if necessary.

ii. Keep an official roster of IEC officers including **current contact information.**

iii. Write and receive correspondence for the IEC.

iv. Record, sign **and** submit copies of the **meeting minutes** to the JOM staff and maintain copies of meeting minutes.

v. Read minutes of the previous meeting.

vi. Maintain "copy-only" files of IEC business.

vii. Maintain forms and ensure their proper usage and completion as required for compliance with all rules, regulations, laws, and this manual.

viii. Submit copies of all completed meeting documents, forms, and files to the JOM staff for storage in the permanent program files.

h) Treasurer responsibilities are to:

i. Serve as the Secretary, Vice-Chairperson or Chairperson if necessary.

ii. Maintain the fund raising activity finances of the IEC and report on account status at duly called meetings.

iii. Reports on contract funds use and balances for the IEC

3. IEC officers must be elected by majority vote of the participating parents and/or guardians, including persons acting as ***in loco parentis***, of eligible Indian students. Officers must also be parents of eligible Indian students.

4. IEC Policies and Procedures will, at a minimum, require:

a) Elections to be conducted in accordance with IEC on even numbered years IEC's will ensure that this is included within their by-laws during the regular annual review and revision period (as designated by the IEC, typically October). Note: By-laws can change at IEC discretion and timeframe.

b) BIA OIEP NACIE and Ho-Chunk Nation JOM Handbooks are distributed to new officers.

c) New officers are given an orientation to their duties and responsibilities **by the JOM program staff after they are elected**.

d) JOM Staff provide budget and program reports at duly called meetings as requested.

e) JOM staff will attend IEC meetings, at the request of the IEC with a two (2) week notice.

f) IEC secretaries ensure that agendas, meeting minutes, meal/door-prizes are ready for all duly called meetings. Secretaries also ensure that adequate meeting notice and pertinent agenda information is made available to all parents of eligible Indian students and the JOM staff.

aa.) Door Prizes are only for those parents of registered students attending and participating in a IEC meeting.

bb.) Meals are only for those parents/guardians and their JOM Program enrolled children attending and participating in an IEC meeting.

g) IEC Officer will conduct all duly called meetings per IEC By-Laws.

h) Simple parliamentary meeting process and rules apply at all meetings and it is the responsibility of the presiding officer to ensure compliance with this.

aa.) Motions made at meetings must be in writing and read aloud by the Chairperson before being voted upon. Only parents/guardians and members may vote at the meetings.

bb.) Secretaries will ensure that all motions and other business are recorded in the official meeting minutes as required.

5. IEC meeting procedures will follow, at a minimum;

b) Agenda prepared by the Chairperson, Vice-Chairperson and Secretary as required to include, at least, the following:

i. **Call to Order**
ii. **Prayer**
iii. **Roll Call**
iv. **Agenda Approval**
v. **Review Meeting Minutes of Last Meeting**
vi. **Reports**
vii. **Unfinished Business**
viii. **New Business ix. Announcements**
x. **Next Meeting**
xi. **Adjournment**

7) **Copies of all meeting** documents are turned in within **three (3)** business days of the meeting for processing and filing by the JOM staff.

SECTION IX: FEDERAL JOM POLICY

1) The Education Plan serves as a contract between the Bureau of Indian Affairs Office of Indian Education Programs National Advisory Committee on Indian Education (BIA OIEP NACIE), the Contractor (Ho-Chunk Nation).

2) JOM Program staff **monitors each sub-contractor for compliance with their own education plans, by-laws, approved expenditure lists and all** applicable laws, rules and regulations.

3) All JOM Program files will be maintained in lockable file cabinets that are to be kept locked when JOM Program staff is not present.

4) Funds received for the JOM Program from the BIA OIEP NACIE shall be expended only for the benefit of eligible Indian students.

5) The JOM Program cannot supplant, but may supplement Federal, State, Tribal, and local funds. Use of JOM Program funds will not result in the decrease of Federal, State, Tribal or local funds which would be made available for Indian students if there were no funds under this contract.

    a) Tribes operating JOM Programs need to clearly understand that their JOM Program is not duplicating the local school obligations to Indian students, including transportation and tutoring that fall into this area.

    b) The IEC's of the Ho-Chunk Nation's JOM Program will always ascertain what services the schools in their areas of service are providing to Indian students and then address the specialized and unique educational needs that fall outside the school's responsibilities.

7) Federal, State, and local funds must be used to provide comparable services to non-Indian and Indian students prior to the use of JOM contract funds. The Ho-Chunk Nation and its established programmatic funds is the "payer of last resort."

8) The school lunch program of the United States Department of Agriculture (USDA) shall constitute the only federally-funded school lunch program for Indian students in public schools. Where Indian students do not qualify to receive free lunches under the National School Lunch Program of the USDA because the students are non-needy and do not meet the family size and income guidelines for free USDA lunches, the Education Plan may provide, to the extent of funding available for JOM Programs, for free school lunches for those students who do not qualify for free USDA lunches but who are eligible students within the JOM Program.

SECTION X: PROCESSING JOM REIMBURSEMENT PAYMENTS & RECONCILIATIONS

1) The foundation of the JOM Program is to provide supplementary financial assistance to meet the unique and specialized education needs of Indian children. The JOM Program **is not** to be used as the primary funding source for any activity. **The donations of JOM funds is illegal per federal law.**

2) The IEC will develop a list of reimbursable education related activities, items, and purchases, as well as a list of allowable expenditures ensuring that the approved expenditure list complies with each IEC's annual budget. Any expenditures that are included on the approved expenditure listing that creates a situation where any students will exceed their equitable share of JOM funds should be balanced either by the inclusion of an active fundraising program undertaken by that IEC or some alternate explanation of funding plans must accompany the expenditure listing**.**

    a. These lists will be reviewed annually and submitted with the Education Plan to the JOM Division Staff.

    b. All listed activities, items, and purchases must support the education plan.

3) The IEC shall approve all expenditures using simple parliamentary meeting processes and record these motions and the actions taken in the appropriate meeting minutes. **The HCN JOM Division will not release any funds for expenditures that are not on an IEC's Approved Expenditure List, nor will funds exceeding the total amount of funds approved on the Expenditure List be distributed.**

4) Recipients of reimbursements must be parents/guardians of eligible Indian children and these children must be enrolled in the JOM Program and **must** appear on the enrollment list for the Program.

    a. Original receipts, invoices, bills, etc. are required for all reimbursements/payments. Copies may be used when originals are lost.

    b. These documents are maintained in the permanent JOM Program files located in the JOM staff office.

5) All requested reimbursements/payments must be submitted using the proper JOM Program forms. Reimbursement/payments must also be recorded in the appropriate meeting minutes including the vote results to approve/disapprove.

6) Completed reimbursement/payment requests are forwarded, with a copy of the appropriate meeting minutes to the JOM program staff for review and processing. The JOM Program staff will process the requests within ten (10) days from the date that all required documentation is received by the JOM Staff from the IEC Secretary. The JOM Program Staff will then forward the request to Treasury for payment.

    a. When received by the JOM Program staff the completed forms will be date stamped and reviewed for accuracy, quorum attained, motions passed, properly recorded information, proper forms used, receipts, invoices, bills, etc. are attached, all information spaces are filled out, and required signatures are present.

    b. JOM Program staff also reviews the student listing to ensure the student(s) are eligible.

    c. JOM Program staff ensures that the item(s) are on the IEC's approved reimbursement/payment eligibility listing as well as that the budget line item is covered by available funds.

        1. If any required information is missing or incorrect the JOM Program staff will send this back to the IEC for correction.

        2. If there is a lack of funds, the request does not comply with the approved expenditure listing or if the student is not listed on the reimbursement/payment eligibility listing, the request will be denied and returned to the IEC.

        3. The IEC secretary is responsible for ensuring all submissions to the JOM Program staff is complete, correct and that copies have been made for their IEC files.

4. JOM Program staff will make copies of items for submission with vouchers. Originals will be kept in the JOM Program files with a copy of the completed voucher.

5. Education Department staff mails all reimbursements/ payments to the designated recipient and provides a copy of the check and voucher to the JOM Program staff, and/ or IEC's for filing.

7) Funds requested for a specific activity/expenditure must be used for that specific activity/expenditure. **All funds that are not used in the manner specified must be reimbursed to the JOM Program immediately after the event conclusion**.

8) JOM related activities/expenditures are required to be reconciled within 72 hours of the closing of the event by the IEC.

   a. Items to be included with all reconciliations (no exceptions):

      i. Participant listing

      ii. Participant sign-in

      iii. Original Receipts or council approved receipt, invoices, and/or bills

      iv. Unspent funds in either check or money order made to: **Ho-Chunk Nation**

      v. Copy of initial and subsequent meeting minutes showing approval, planning, budget, and other supporting documents supporting this having been accomplished prior to the activity/expenditure taking place.

      vi. Copy of the education plan used as the basis for the activity/expenditure.

SECTION XI: SETTING UP SCHOOL SUPPLY DISTRIBUTION, REIMBURSEMENTS AND ACCOUNTS

There are two (2) options for school supply purchase/reimbursement **ONLY IF THE**

NEEDS ASSESSMENTS AND EDUCATION PLAN SUPPORT THIS EXPENDITURE:

Option 1: Distribution by IEC

1) The IEC approves of bulk purchase through meeting minutes, specifying dollar amount, who is to purchase, where the purchase is to be made (vendor or vendor(s)), who is responsible for reconciliation and any other pertinent information with accompanying motion and vote for approval.

2) IEC's will also provide the JOM staff with a school supply list of bulk items to be purchased by July 15 of the current school year.

    a. The school supply list of bulk items will be prepared by the IEC's using the approved school supply lists of the school districts where participants will be enrolled.

3) The IEC will set the school supply purchase amount allowed per student based upon grade level and supplies required by school district(s) in the service area.

4) The IEC will be responsible for establishing a school supply distribution list with student names and supplies to be issued based upon grade level and school requirements.
5) The IEC will establish a distribution schedule that ensures that supplies are delivered to participants prior to the start of school.

6) JOM Program staff will then have the responsibility of processing the request and ensuring that a check is made available for the purchase from the vendor.

7) IEC Officers must be present during distribution of school supplies.

8) Participants, and/or parent/guardian will sign for receipt of school supplies.

9) School supply distribution must be reconciled by the IEC within thirty (30) days of the completion of the distribution.

10) Any supplies or money that is not reconciled within thirty (30) days will be turned over to the Ho-Chunk Nation Department of Justice for collection from the IEC Officers of that area that were present during the distribution. If distribution occurred when there were no IEC officers present, ALL officers will be deemed responsible for the repayment of the unreconciled amounts.

Option 2: Reimbursement

1) The IEC will determine and record in appropriate meeting minutes or an allowable reimbursement list on file with the JOM Program detailing an amount to be reimbursed per child for school supplies.

2) The IEC will determine and record in appropriate meeting minutes a deadline for reimbursements to be turned in to the IEC for approval of payment.

3) The IEC Secretary will ensure that each reimbursement includes original receipts with children's names written on the back with parent or guardian name and address (copies may be used if originals are not accessible) and a completed Reimbursement/Payment Form listing all approved reimbursements. Also, a completed Reimbursement Request Form for each parent or guardian requesting reimbursement and that the amounts of each reimbursement and who it is to be paid to are recorded in the appropriate meeting minutes with accompanying motion and vote for approval.

4) All documents regarding reimbursement must be submitted by the IEC Secretary to the JOM Staff within thirty (30) days of purchase/ receipt and approval with appropriate meeting minutes. **These documents must include the receipt, a copy of the Education Plan and the approved expenditure list demonstrating these expenditures are consistent with the goals of the IEC.**

5) JOM Staff will have ten (10) days to process all reimbursement requests after they are received **and submit the request to Treasury for processing**.

SECTION XII: FINANCIAL MANAGEMENT STANDARDS

GRANTEE *means the nonprofit corporation or other legal entity to which a grant is awarded and which is accountable to the Federal Government for the use of the funds provided.* **[Source: EDGAR—Section 74.3 Definitions]**

As a GRANTEE of federal funds, the HO-CHUNK NATION (HCN) Education Department Accountant and selected staff of the Department of Treasury must collectively plan, implement and evaluate fiscal activities including *Financial* Status Reports (SF-269s) to maintain compliance to the following standards.

(A) **Financial Reporting:** *Accurate, current, and complete disclosure of the financial results of each project or program shall be made in accordance with the financial reporting requirements of the grant or sub grant.*

(B) **Accounting Records:** *Records which identify adequately the source and application of funds for grant or supported grant-supported activities shall be maintained. These records shall contain information pertaining to grant or supported awards, authorizations, obligations, unobligated balances, assets, outlays, income, and, if the recipient is a government, liabilities.*

(C) **Internal Controls:** *Effective control and accountability shall be maintained for all grant or supported cash, real and personal property covered by Subpart O of this part (reference EDGAR Section 74.3), and other assets. Recipients shall adequately safeguard all such property and shall assure that it is used solely for authorized purposes.*

(D) **Budgetary Controls**: *The actual and budgeted amounts for each grant or grant-supported activity shall be compared. If appropriate or specifically required, recipients shall relate financial information to performance or productivity data, including the production of unit cost information. If unit cost data are required, estimates based on available documentation will be accepted whenever possible.*

(E) **Advance Payments:** *Procedures shall be established to minimize the time elapsing between the advance of Federal grant or supported funds and their disbursement by the recipient. When advances are made by a letter-of credit method, the recipient shall make drawdowns as close as possible to the time of making disbursements.*

(F) **Allowable Costs:** *Procedures will be established for determining the reasonableness, allow ability, and allocability of costs in accordance with the applicable cost principles prescribed by Subpart A of this part and terms of the grant.*

(G) **Source Documentation:** *Accounting records shall be supported by source documentation such as cancelled checks, paid bills, payrolls, contract and sub grant award documents.*

SECTION XIV: REPORTING REQUIREMENTS

The following REPORTING REQUIREMENTS will be planned, implemented and evaluated by the Ho-Chunk Nation Education Department to comply with mandated GRANTEE responsibilities. The actual drafting of these reports must be conducted by the IEC's and submitted to the JOM Program Staff for compilation and submission to the BIA. Without the participation of the Parents, the program cannot effectively be evaluated or implemented.

Semi-Annual Financial Status Report
(SF-269 A and Attachment 1)

Will be facilitated by the HCN Department of Treasury and submitted by **April 25, October 25,** and/ or final **90 days after the conclusion** of the contract or fiscal year.

SECTION XV: ANNUAL REPORT

A product final assessment of JOM activities (Annual Narrative Report) will be compiled by collection of data that define the net effects of the EDUCATION PLANS applied in the project. The Annual Narrative Report will produce and interpret findings related to whether the three (3) OBJECTIVES produced desirable changes and their potential for being replicated. The following measurable narrative reporting format will assess whether this JOM program worked. The Annual Report is due December 31st each year.

Educational Support Objective

By September 30, of the current contract year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars for Educational Support Costs that will assist with the cost of basic and unique educational initiatives for each eligible JOM student to enable them access academic readiness enhancement as approved by the IEC's.

Accomplishments:
Barriers to Implementation:
Corrective Action:
Recommendations:

Cultural Awareness Objective

By September 30, of the current contract year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars for Cultural Awareness Costs that will: (1) create and foster cultural awareness in the local community and (2) to reinforce tribal identity for each eligible JOM student as approved by the IEC's.

Accomplishments:
Barriers to Implementation:
Corrective Action:
Recommendations:

Administrative Objective

By September 30, of the current contract year, JOM staff in concert with the HCN Education Department Accountant will facilitate a prorated percentage of dollars for Administrative Costs that will provide reimbursement and payment for meeting expenses incurred by the JOM Committee(s) to enable them to carry out their JOM duties as approved by the IEC's.

Accomplishments:
Barriers to Implementation:
Corrective Action:
Recommendations:

SECTION XVI: PENALITIES FOR NON-COMPLIANCE WITH HCN JOM POLICY MANUAL [SOURCE AUTHORITY 25CFR-273.51]

If any officer, director, agent or employee of, or connected with, any contractor or subcontractor under this part embezzles, willfully misapplies, steals, or obtains by fraud any of the funds or property connected with the contract or subcontract, he/she shall be subject to the following penalties:

a *If the amount involved does not exceed $100, he/she shall be fined not more than $1,000 or imprisoned not more than one year, or both.*

b *If the amount involved exceeds $100, he/ she shall be fined not more than $10,000 or imprisoned for not more than two years, or both.*

In an effort to avoid Federal penalties these actions will be taken first.

If at any time, an IEC is determined to operate in a manner inconsistent with the JOM Policy Manual, the **JOM Division Manager** will take the following steps to try and obtain voluntary compliance.

1) The non-compliant act(s) will be brought to the attention of the **IEC** along with any supporting documentation or information.

    a. The IEC Representative will be afforded the opportunity to address the issue(s) and demonstrate that the issue(s) was resolved

2) If the IEC is unable to resolve the issue locally, the JOM Division Manager will freeze the IEC budget until the issue can be resolved though the Ho-Chunk Nation Department of Justice. Once action has begun through the Ho-Chunk Nation Department of Justice and the outcome seems to support the timely resolution of

the situation, the JOM Division Manager MAY unfreeze the IEC's budget or may place conditions that must be met in order to have the budget unfrozen. These may include the replacement of an IEC officer or the immediate repayment to the Ho-Chunk Nation any funds that are not reconciled.

3) If issues are not in a timely fashion through the intervention of the Ho-Chunk Nation Department of Justice nor through voluntary repayment or other recommended action, the JOM Division Manager may re-allocate the affected areas funds to another area to ensure that services are still provided to the affected areas children. The affected area will then comply with the new areas by-laws, expenditure lists and any other regulations that they may have in place until such time as the JOM Division Manager deems it appropriate for the affected area to resume its role of providing services.

APPENDIX

Budget Profile Sheet
[Headcount & Annual Budget by Area]

JOM
Budget Breakdown
[Baraboo/Reedsburg/Portage, Black River Falls/Neillsville, Eau Claire/Augusta/Osseo-Fairchild, La Crosse, Madison (Dane County), Pittsville/Port Edwards/Nekoosa, Stevens Point, Tomah, Wisconsin Dells/Mauston/Adams-Friendship, Wisconsin Rapids, Wittenberg]

JOM FINANCIAL REPORTING
SAMPLE
[Source: HCN Education Department Accountant]

HCN JOM PROGRAM APPROVED FORMS
[Source: HCN JOM Staff]

EXAMPLE

FYXXXX JOM BUDGET			
AREA	**HEADCOUNT**	**ANNUAL BUDGET**	
ADMINISTRATION	N/A	$23,550.00	
BARABOO	76	$5,368.00	
BLACK RIVER FALLS	129	$9,111.00	
LA CROSSE	58	$4,097.00	
NEILLSVILLE	10	$706.00	
PITT/PORT ED/NEK	45	$3,178.00	
TOMAH	79	$5,580.00	
WISCONSIN DELLS	166	$11,725.00	
WISCONSIN RAPIDS	42	$2,966.00	
WITTENBERG	49	$3,461.00	
EAU CLAIRE	40	$2,825.00	
MADISON	70	$4,944.00	
STEVENS POINT	14	$989.00	
TOTAL	778	$78,500.00	
General Rules in Federal Budgets			
Administration 30%	$ 23,550.00		
Program Services 70%	$ 54,950.00		
Total 100%	$ 78,500.00		
breakdown per student is	$ 70.63		

JOM PROGRAM APPROVED FORMS

All forms listed are to be used, as needed and required, when conducting IEC business. **The format of these forms can be altered to suit each area as needed but the content of the information must remain intact.**

The IEC Meeting Minutes Forms can be used "as-is" or as a guide for typed minutes. Submit all sheets, used or un-used to JOM Program staff for inclusion in the permanent program files.

Johnson O'Malley Program

Meeting Minutes Form

Date: _____/_____/_____

Type of Meeting: _____

Location of Meeting: _____

Time Meeting Called to Order: _____ a.m. / p.m. *(Circle One)*

Meeting Called to Order by: _____ Title: _____

Prayer Conducted by: **_____***(Optional)*

Attendees Names: *(Note: Officers put their title next to their name)*

1. _____ 11. _____
2. _____ 12. _____
3. _____ 13. _____
4. _____ 14. _____
5. _____ 15. _____
6. _____ 16. _____
7. _____ 17. _____
8. _____ 18. _____
9. _____ 19. _____
10. _____ 20. _____

Quorum established (circle one): **YES** / NO

Note: If more space is needed on any page, use the back of the pages and be sure to reference what it is a continuation of.

AGENDA

Motion Made Is To Approve Agenda: _____

Motion Is Made By: _____ Second Is By: _____

Vote: _____ For _____ Against _____ Abstained

Motion: (check one) ☐ **Carries** ☐**Fails** **Other: _____**

MINUTES REVIEW FOR LAST MEETING

Minutes of Last Meeting Read By: _____ Title: _____

Comments: _____

Motion Made Is To: _____

Motion Is Made By: _____ Second Is By: _____

Vote: _____ For _____ Against _____ Abstained

Motion: (check one) ☐ **Carries** ☐**Fails** **Other: _____**

REPORTS

Report: _____

_____

_____

_____

_____

_____

Reported by: _____ Title: _____

Report: _____

_____

_____

_____

_____

_____

Reported by: _____ Title: _____

Report: _____

_____

Reported by: _____ Title: _____

Report: _____

Reported by: _____ Title: _____

UNFINISHED BUSINESS

Unfinished Business: _____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____

Unfinished Business: _____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____ **Unfinished Business:** _____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____

Unfinished Business: _____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐**Fails** **Other:** _____

NEW BUSINESS

New Business: _____

Motion Made Is To: _____

_____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____

New Business: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Motion Made Is To: _____

_____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:**
_____ **New Business:**
_____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____

New Business: _____

Motion Made Is To: _____

Motion Is Made By: _____ **Second Is By:** _____

Vote: _____ **For** _____ **Against** _____ **Abstained**

Motion: (check one) ☐ **Carries** ☐ **Fails** **Other:** _____

ANNOUNCEMENTS

Announcement: _____

Made by: _____ **Title:** _____

Announcement: _____

Reported by: _____ Title: _____

Announcement: _____

Reported by: _____ Title: _____

Announcement: _____

Reported by: _____ Title: _____

Next Meeting Information

Next Meeting Location: _____

Date: _____/_____/_____ Time: _____ a.m. / p.m. *(Circle One)*

Next Meeting Expense Check Should Be Made To: _____

Address: _____ City: _____ State: _____

Zip: _____ Tel. #: _____ Fax #: _____

Adjournment Motion

Motion Is Made By: _____ Second Is By: _____

Time: _____ am/pm

Vote: _____ For _____ Against _____ Abstained

Motion: (check one) ☐ **Carries** ☐**Fails** **Other: _____**

Signature of Secretary: _____
By signing this document I am attesting that everything herein is factual and true to the best of my knowledge.

Note: *Attach all other documents, sign-in sheet form, receipts and others necessary for reimbursements or other action by the JOM staff Services Johnson O'Malley Program staff to this form before submitting. Keep a copy of all documents for your IEC files.*

Johnson O'Malley Program
Meeting Sign -in Form

Date: _____/_____/_____ Location: _____

	Name (Print)	**Address & Phone #**	**Email address**	**Signature**
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				

Johnson O'Malley Program
Meal Receipt Form

Date: _____/_____/_____ **Location: _____**

	Name (Print)	**Signature**
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		

Revised 2/21/06

Revised 2024

Johnson O'Malley Program Registration Form

Date: _____/_____/_____ Male: _____ Female: _____

Student Name: _____ _____
(Print)

Grade: _____ Age: _____ D.O.B.: _____/_____/_____ Email address:_____
MM DD YY

Mailing Address: _____City: _____ State: ____ Zip:_____

Tribal Affiliation: _____ Tribal Enrollment #: _____

School District: _____ School Name: _____

JOM Area/IEC (Circle One):

Baraboo/Reedsburg/Portage/Wi Dells/Mauston Black River Falls/Neillsville/ AC-H-M/Blair-Taylor Eau Claire Wittenberg Augusta/Osseo-Fairchild La Crosse Madison/Dane County Pittsville/Port Edwards/Nekoosa Stevens Point Tomah/ Sparta Wisconsin Rapids

Parent/Guardian Name: _____ Phone #: _____
(Print)

Are you available to serve on the JOM Parent/Officer Committee? Yes: _____ No:_____

Chairperson's specific duties – Call meetings, Chair meetings, and Represent Committee
Secretary's duties – Record minutes, Send minutes and meeting notices ou
Vice-Chairperson's duties – Act as Chair in Chair's absence.

We invite your comments regarding your child so that we may better meet his/her educational needs in his/her school or other areas:

Eligibility requirements are: 3 years of age (by October 1st) through grade 12 and are a 1/4 or more degree Indian blood AND recognized by the Secretary as being eligible for Bureau services (273.12 Eligible students.) Documentation must be submitted to IEC Secretary/ Officers to verify enrollment/blood quantum one time (not needed each year).

I hereby give authority to the JOM IEC Officers to *verify* my child's enrollment by receiving a copy of the Certificate Degree of Indian Blood for purposes of JOM program eligibility.

_____

Parent/ Guardian Signature:

Participant Eligibility Verified By IEC Officer:_____Signature
Participant Eligibility Verified By IEC Officer: _____ Signature

Revised 2/21/06 2nd Revision 11/4/2007

Johnson O'Malley Program

IEC Door Prize Receipt Form

Date: _____/_____/_____ IEC: _____

	Name (Print)	**Prize Won**	**Signature**
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			

Johnson O'Malley Program

IEC Activity Payment Receipt Form

Date: _____/_____/_____ IEC: _____

Activity: _____ Location: _____

	Name (Print)	**Title** (Cook, Dancer, Etc.)	**Amount of Payment Recv'd**	**Signature**
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

Johnson O'Malley Program

IEC Activity Participation Verification Form

Date: _____/_____/_____ IEC: _____ ____

Activity Name: _____ Location: _____

	Name (Print)	**Title** (Student/Parent/Guardian)	**Signature**
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Johnson O'Malley Program

Parent Training Report Form

Date: _____/_____/_____

Name (Print)**: _____ IEC Area**: **_____**

Title of Training: _____

Presenter: _____ Location: _____

Date of Training: _____/_____/_____ Topic(s)**: _____**

To: _____/_____/_____ _____

New Ideas, Methods, Activities, Information Shared: _____

Recommended Suggestions for HCN JOM Program to Utilize: _____

Positive/Negative Aspects of Training Offered: _____

Recommend Sending Parents Again Next Year? ☐ YES ☒ NO

If NO, explain? _____

Please attach copies of all handouts, student materials, and other pertinent documents. Also complete the Narrative Report on the training(s) you attended to share with other JOM parents.

Training Report Narrative

Signature:_____

Revised 2/21/06
Second revision 8/6/09

Reimbursement Request Form

Johnson O'Malley Program

Make Check Payable to:
Address/Street, P.O. Box
City State Zip
Telephone #

IEC/School District
IEC Chairperson:
IEC Meeting Date of Approval:

Name of Student (Print)	Description	IEC Budget Line Item # to be Charged	Amount
		TOTAL:	

Will **NOT** be processed without signature.

Parent/Guardian Signature:
Date:

Reminder: Attach original receipts, bills, etc. for faster processing

Yellow highlighted must be completed by parent for reimbursement to be approved.

Johnson O'Malley Program
Reimbursement/Payment Form

Date: _____/_____/_____ **School Year _____/_____**

TO: Johnson O'Malley Program Staff

FROM: _____ /IEC

(Expenses listed on this form have been approved for payment at the IEC meeting described above. Copies of the minutes and supporting documents must be attached)

For Reimbursement(s) (Describe):

Total Amount $_____

For Payments to School(s)/Vendor(s) (Describe):

Total Amount $_____

Are minutes of IEC meeting, receipts, invoices, bills, cancelled checks, etc. attached as required?

☐ **YES** ☐ **NO** - If no explain: _____

_____

Other Comments: _____

_____ _____

Form completed by: _____/_____

Signature Title

Printed Name:

_____

Revised 2/21/06 second revision 8/6/09 ***Front***

Details of Approved JOM Expense(s) - _____IEC

	Date *DD/MM/YY*	**Make Check Payable To:**	**Amount**	**Purpose**	**Line Item**
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					

20					
21					
22					
23					
24					
25					
26					
27					

Revised 2/21/06 second revision 8/6/09 ***Back***

Ho-Chunk Nation
Johnson O'Malley Program
Needs Assessment Survey

IEC: _____FY:_____

1. PLEASE CHECK ANY NEEDS THAT SHOULD BE PROVIDED THROUGH THE JOM PROGRAM TO NATIVE AMERICAN STUDENTS

   _____A. Tutoring Grade_____

   _____B. Indian Cultural Programs

   1. _____ Presentations 2._____ Pow wows 3._____ Arts & Crafts

   Other Suggestions: _____

   _____C. Math/Science Improvement

   _____D. Reading/Language Improvement

   _____E. School Supplies

   _____F. Career Counseling or Higher Education Orientation

   _____G. Educational Support (list): _____

   _____H. Other Suggestions: _____

2. SELECT YOUR CHOICE OF THE THREE (3) MOST IMPORTANT NEEDS LISTED:
   1. _____
   2. _____
   3. _____

3. HOW DO YOU THINK YOUR JOM IEC FUNDS COULD BE BETTER UTILIZED TO ENABLE NATIVE AMERICAN STUDENTS TO BE REPRESENTED EQUALLY IN SCHOOL ACTIVITIES?
_____

4. DO YOU FEEL THE JOM IEC IS REPRESENTING YOUR SPECIFIC SCHOOL DISTRICT? _____IF NOT, WHY? _____

4. PLEASE CIRCLE THE CATEGORY THAT BEST DESCRIBES YOU:
   PARENT/GUARDIAN STUDENT

Revised 2024

Johnson O'Malley Program

School Supply Receipt Form

Date: _____/_____/_____ IEC: _____

	Child's Name (Print)	**Parent/Guardian Name** (Print)	**Parent/Guardian Signature**
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			