

**DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
BUREAU OF INDIAN EDUCATION**



**JOHNSON O'MALLEY
TRIBAL CONSULTATION
2015**



Consultation Agenda

Welcome

Opening Prayer

Staff Introductions

Consultation Purpose

Overview of 2015 JOM Consultation Sites

Overview of Consultation Topics

Format for Providing Comments during Meeting

Format to Mail, Email, Fax or Hand Deliver Comments

Begin Discussing Topics #1-6

Adjourn Meeting

Opening Prayer



BIE & BIA Staff

Bureau of Indian Education

Juanita Mendoza, Acting Chief of Staff
Office of the Director

Jennifer Davis, Program Analyst
Johnson O'Malley Program
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Bureau of Indian Affairs

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Division of Indian Affairs
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Consultation Purpose

Through legislative authority provided by 25 USC 2011 (b) the Bureau of Indian Education and Bureau of Indian Affairs is consulting with participants* on Johnson O'Malley education topics. The BIE and BIA is seeking comments, suggestions, feedback and viewpoints on five JOM consultation topics.

Our participants may include: * Tribal Leaders/Current JOM Contractors/ Potential JOM Contractors/JOM Indian Education Committee Members, School Board Members/ Tribal organizations/Employees of public schools serving American Indian populations/Urban Indian communities/BIE's previously private schools/Indian school boards/ Parents/ Student organizations and Other Interested Parties.

2015 JOM Consultation Meeting Sites

- **March 31, 2015 - (On-site at Portland, Oregon)**
 - Portland Marriott Downtown Waterfront (1-4pm – Salon I)
- **April 2, 2015 & April 8, 2015 (Webinar/Teleconference)**
 - Call-in # 888-421-9594 (12noon – 3pm EDT)
 - Webinar Access: URL: <https://www.mymeetings.com/nc/join/>
 - Conference Number: RW1826786
 - Audience passcode: 1847541
- **April 10, 2015 - (On-site at Oklahoma City, Oklahoma)**
 - Holiday Inn Oklahoma City Airport
 - 4401 SW 15th Street Oklahoma City, OK
 - 9-12noon (CDT)

JOM Consultation Topics

- 1. The 2014 updated JOM student count.**
- 2. The JOM funding methodology based on the updated 2014 student count.**
- 3. A proposal to revise the current JOM student eligibility definition as provided in 25 CFR §273.12**
- 4. The designation of a measurable metric element(s) to evaluate the effectiveness of a JOM program.**
- 5. A proposal to revise the expired JOM Application Contract, form BIA-62116 (OMB No. 1076-0096)**
- 6. Open Item**

Format for Providing Comments & Viewpoints During the Meeting

1. Time will be provided for questions, answers and discussions.
2. Meeting participants are asked to use the microphone when presenting verbally points of view & comments on the consultation item.
3. Since comments from several hundred meeting participants are anticipated, it will be helpful if all comments and suggestions, written and oral, include the following information:
 - Name of the respondent
 - Name and address of the organization which the respondent represents.
 - Consultation topic being addressed
 - Your comments, suggestions and/or viewpoints

Format for Providing Written Comments or Viewpoints

1. Written comments shall include the following information:
 - Name of the respondent
 - Name & address of the organization which the respondent represents.
 - JOM Consultation topic being addressed
 - Your comments, suggestions and/or viewpoints

Written Comments Can Be Sent To:

- **Email responses to:**

JOMComments@bia.gov

- **Telefax responses to:**

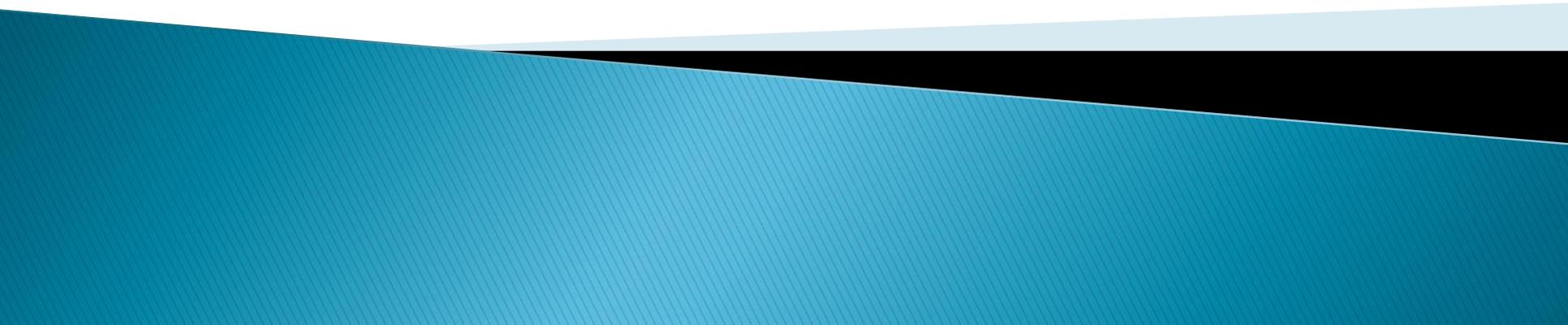
(202) 208-3271

- **Mail or Hand Deliver responses to:**

Attn: Jennifer Davis
1951 Constitution Ave
MS-312A-SIB
Washington, D.C.
20245

CONSULTATION TOPIC #1

The 2014 Updated JOM Student Count



The 2014 Updated JOM Student Count POTENTIAL ISSUE OR CHANGE:

- ▶ The distribution of the 2016 JOM funding will be effected depending on the 2015 JOM tribal consultation input/feedback/comments on how the BIE should finalize the 2014 student count.

The 2014 Updated JOM Student Count

REASON FOR PROPOSING ISSUE OR CHANGE:

- ▶ To provide the public with information about how the 2014 updated JOM student count was obtained, the factors affecting the count, its dilemmas, and the final results of the count.
- 

The 2014 Updated JOM Student Count

CURRENT OPTION (S) BEING CONSIDERED BY THE BUREAU:

- ▶ The BIE proposes to continue to pursue the collection of the JOM student count from all original and prospective JOM contractors

Background

2014	2012
Not all JOM contractors submitted a student count by the December 31, 2014, deadline.	Not all JOM contractors submitted a student count by the 2012, deadline.
2014 final student count = 341,495 <ul style="list-style-type: none">Final count increased by 20,222 eligible students.	2012 final student count = 321,273
399 contractors submitted a count. <ul style="list-style-type: none">249 of them were tribal contractors150 were non-tribal contractors.The # of JOM contractors who submitted a student count decreased by 49 contractors in 2014	448 contractors submitted a count.

Background

2014

Contractors that **did not** submit a student count for 2014 included:

- Original contractors from 1995 and
- Prospective contractors who were added in 2012.

In addition, some of the original JOM contractors' submissions showed:

- A **dramatic decrease** of students from their 1995 count as compared to their 2014 count.
- Other cases, some contractors had a **dramatic increase** of students they counted.

These dramatic increases or decreases will definitely impact funding amounts in 2016 depending on the funding formula and consultation input.

CURRENT OPTION(S) BEING CONSIDERED

▶ OPTION #1:

The BIE has submitted the results of the 2014 JOM student count to Congress. Should the BIE accept JOM student counts from any contractor beyond the deadline for submission? For 2014, the deadline to submit a student count was December 31, 2014. The 2014 JOM student counts submitted on or before the December 31, 2014 deadline were accepted by the BIE and those results were submitted to Congress.

▶ OPTION #2:

Should the BIE pursue collecting updated student counts from the remaining JOM contractors who did not submit a 2014 count that are listed as the 1995 original contractors and the 2012 prospective contractors within the BIE's Official JOM Roster as of December 31, 2014?

CURRENT OPTION(S) BEING CONSIDERED

- ▶ **OPTION #3:**

Should the BIE continue to accept student counts through September 30, 2015?

- ▶ **OPTION #4:**

Should the BIE use the student counts that are on the books for the JOM contractors who did not submit a 2014 count? This would include the original contractors from 1995 and the prospective contractors placed on the roster in 2012 as their 2014 student count.

Please comment on the following topics:

- ▶ Comment on **OPTION #1**.

Should the BIE accept any more student counts from any JOM contractors (original or prospective) after the December 31, 2014 deadline?

- ▶ Comment on **OPTION #2**.

Should the BIE continue to accept and pursue the collection of student counts from the remaining JOM contractors who did not submit a 2014 count, but only from those contractors who are currently listed on the BIE's Official JOM Roster as of December 31, 2014?

Please comment on the following topics:

- ▶ Comment on **OPTION #3.**

Although the deadline to submit an updated 2014 JOM student count was December 31, 2014, shall the BIE continue to accept updated JOM student counts until September 30, 2015?

- ▶ Comment on **OPTION #4.**

The JOM contractors who did not submit a 2014 count (original contractors from 1995 and added prospective contractors who were placed on the roster in 2012), shall the BIE use their last reported student count as their 2014 student count?

CONSULTATION TOPIC #2

**The JOM Funding
Methodology Based on
the 2014 Updated Count**

The JOM Funding Methodology Based on the 2014 Updated Count

POTENTIAL ISSUE OR CHANGE:

The JOM student count and funding for tribal and non-tribal contractors has not changed since 1995. The perception from various tribes and organizations representing tribes imply that the JOM student population has increased since 1995.

The JOM Funding Methodology Based on the 2014 Updated Count

REASON FOR PROPOSING ISSUE OR CHANGE:

To provide clarity about the JOM funding methodology based on the updated 2014 JOM student count.

The JOM Funding Methodology Based on the 2014 Updated Count

CURRENT OPTION (S) BEING CONSIDERED BY THE BUREAU:

The BIE proposes to continue to pursue the collection of the JOM student count from all original and prospective JOM contractors

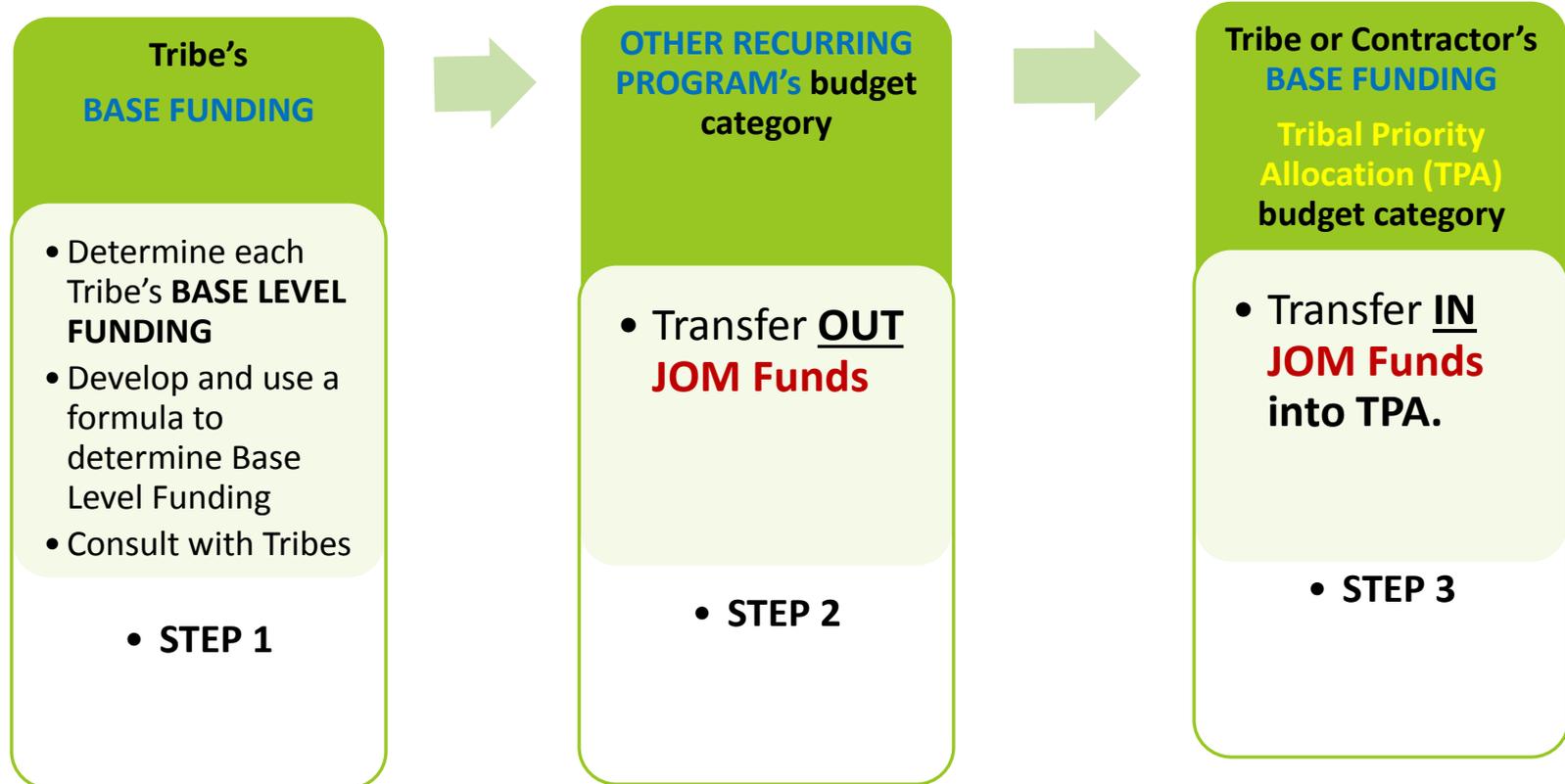
Background

Funding Methodology Based on the 2014 Updated Count

- In 1995, the BIA conducted the last verified JOM student count for purposes of a final distribution of the JOM program funds.
- The final 1995 JOM student count listed 271,884 students.
- Both the House and Senate Appropriations Committees directed the BIA to determine each tribe/contractor's recurring base funding level (via a formula in consultation with tribes) and transfer the JOM funds from the Other Recurring Programs budget category into each tribe/contractor's base funding within the Tribal Priority Allocations (TPA) budget category.

Background

Funding Methodology Based on the 2014 Updated Count



Background

Funding Methodology Based on the 2014 Updated Count

With the transfer of the JOM base funding level to each tribe/contractor in 1995, there was no further need for an annual JOM student count to distribute the JOM funds.

FOR THE TRIBES

Each year, the JOM funds are transmitted to each tribe as part of their base funding to the Tribal JOM contractors through their

- **93-638 contracts – Tribal Priority Allocation (TPA);**
- **Self-Governance compacts (OSG); or**
- **102-477 Consolidated Tribal Grant Program (CTGP) grants.**

Annual JOM funding is still based on the 1995 JOM student count.

FOR PUBLIC SCHOOLS

Each year, JOM funds are distributed to the appropriate BIE Education Line Office (ELO) to place in the:

- **State's JOM Contract;**
- **Public School District's JOM Contract**

Annual JOM funding is still based on the 1995 JOM student count.

Since all JOM funds have been distributed since 1996 to all JOM contractors based on the 1995 JOM student count, no new JOM contractors have been approved since 1995.

Annual JOM funding is still based on the 1995 JOM student count.

In 2014, the JOM program funds are found in:

- **Self-Governance compacts;**
- **93-638 contracts with tribes, states, public school districts;**
- **102-477 CTGP grants with tribes; and**
- **100-297 grants with some Previously Private Schools.**

In 2012 & 2014 the BIE received a directive from the House and Senate Appropriations Committee to:

*“The Committee directs the Bureau, in coordination with the Department of Education, and in consultation with tribes, to **update its count** of students eligible for the Johnson-O'Malley Program funding and to report the results to this Committee within 180 days of enactment of this Act.”*

DILEMMAS WITH THE 2014 STUDENT COUNT

The questions for the 2015 JOM tribal consultations is how will the 2016 JOM funding be distributed to the JOM contractors?

(1) Not all JOM contractors (*original contractors from 1995 and the prospective contractors placed on the roster in 2012*) submitted a 2014 student count on or before December 31, 2014.

(2) Some figured if they submitted a 2012 count they didn't have to submit a 2014 student count.

(3) There were new prospective contractors who submitted a student count for the first time in 2014. Some of these new contractors submitted data before and after the deadline.

DILEMMAS WITH THE 2014 STUDENT COUNT

(4) In some cases, original 1995 contractors thought since their student count has been in existence for more than 3 years they were grandfathered in by using their 1996 student count, therefore they did not have to submit a 2014 updated student count.

(5) Some were under the perception if they turned in a new count their funding level would decrease as opposed to their original count.

(6) Some contractors never received any type of communication that BIE was conducting a 2014 updated student count.

DILEMMAS WITH THE 2014 STUDENT COUNT

(7) For several sites, the personnel turnover rate was high causing new personnel changes and some inherited new program responsibilities, therefore some people had no idea what the JOM program was or simply missed the deadline because they did not know a 2014 student count was being conducted.

(8) In some of the original 1995 JOM contractors' cases, their 2014 student count either drastically dropped or sharply increased which will cause a huge decrease or increase of program funding.

These are issues that need consideration following the 2014 student count. Our request is to determine how the BIE shall distribute the 2015 JOM funds and to who?

▪ **OPTION #1:**

Provide 2016 funding only to those JOM contractors who submitted a 2014 updated student count on or before December 31, 2014. All other incoming updated student counts will be accepted for the 2017 funding cycle.

▪ **OPTION #2:**

Continue to accept and pursue the collection of student counts from the remaining JOM contractors who did not submit a 2014 count; these contractors included the original contractors from 1995 and added prospective contractors placed on the roster in 2012, and are currently listed on the BIE's Official JOM Roster as of December 31, 2014.

**CURRENT OPTION(S)
BEING CONSIDERED:**

**JOM Funding
Methodology Based
on the 2014
Updated Count**

▪ **OPTION #3:**

Continue to collect and accept student count information from any eligible JOM entity that missed the December 31, 2014 deadline, and who would like to submit an updated JOM student count by September 30, 2015. FY 2016 funds will be provided to those contractors who submit an updated JOM student count on or before September 30, 2015.

▪ **OPTION #4:**

JOM contractors who did not submit a 2014 student count (original contractors from 1995 and added prospective contractors who were placed on the roster in 2012), use their last reported student count as their 2014 student count? That count will then be used for their 2016 JOM fund distribution. In some of the 1995 original JOM contractors' cases, their student count has existed for more than 3 years, therefore these contractors may consider their student count to be grandfathered in.

**CURRENT OPTION(S)
BEING CONSIDERED:**

**JOM Funding
Methodology Based
on the 2014
Updated Count**

- Comment on **OPTION #1**. Should the BIE provide FY 2016 funding only to those JOM contractors who submitted a 2014 updated student count on or before December 31, 2014? In addition, should BIE accept all other incoming student counts they receive after the deadline for the 2017 funding cycle?
- Comment on **OPTION #2**. If the BIE continues to accept and pursue the collection of student counts from the remaining JOM contractors who did not submit a 2014 count, but only from those contractors who are currently listed on the BIE's Official JOM Roster as of December 31, 2014, then those contractors who do submit an updated student count by September 30, 2015 shall they be provided with 2016 JOM funds? Should the BIE accept student counts submitted after the September 30, 2015 deadline, and fund those contractors for the 2017 funding cycle.

**Please comment
on the following
topics:**

**JOM Funding
Methodology
Based on 2014
the Updated
Count**

- Comment on **OPTION #3**. Shall the BIE continue to accept updated JOM student count information from any eligible JOM entity that did not submit student count data for the 2014 JOM student count? What should the deadline be for original or prospective contractors, so they can receive 2016 JOM funds?
- Comment on **OPTION #4**. For those JOM contractors who did not submit a 2014 count (original contractors from 1995 and added prospective contractors who were placed on the roster in 2012), should the BIE use their last reported student count as their 2014 student count? That count will then be used to calculate the 2016 JOM fund distribution.

**Please comment
on the following
topics:**

**JOM Funding
Methodology
Based on the
2014
Updated Count**

CONSULTATION TOPIC

#3

BIE proposes to revise a specific section of the JOM definition of student eligibility as currently listed at 25 CFR §273.12

Revise Definition of Student Eligibility

POTENTIAL ISSUE OR CHANGE:

Using BIE's proposed student eligibility definition will allow greater flexibility and may increase the student eligibility count.



Revise Definition of Student Eligibility

REASON FOR PROPOSING ISSUE OR CHANGE:

To provide absolute clarity of eligible JOM students and eliminate confusion when counting eligible students.

Revise Definition of Student Eligibility

**CURRENT OPTION (S) BEING CONSIDERED BY THE
BUREAU:**

“American Indians ages 3 through grade 12 who are enrolled in public schools are eligible if they are either at least one fourth degree of Indian blood or a member of a tribe recognized by the Secretary of the Interior as eligible for BIE services.”

Background

Revise Definition of Student Eligibility

When the Johnson-O'Malley Act was enacted on April 16, 1934, the student eligibility definition has not been changed. The student eligibility definition follows:

“Indian students, from age 3 years through grade(s) 12, except those who are enrolled in Bureau or sectarian operated schools, shall be eligible for benefits provided by a contract pursuant to this part if they are $\frac{1}{4}$ or more degree Indian blood and recognized by the Secretary as being eligible for Bureau services. Priority shall be given to contracts (a) which would serve Indian students on or near reservations and (b) where a majority of such Indian students will be members of the tribe(s) of such reservations (as defined within 25 CFR §273.2(o)).”

Background

Revise Definition of Student Eligibility

During the 2012 and 2014 student count, the BIE received several inquiries regarding the interpretation of student eligibility.” During both student counts some JOM contractors **may have used** the following interpretation when counting eligible students:

“are $\frac{1}{4}$ or more degree Indian blood or enrolled in a federally recognized tribe as recognized by the Secretary of the Interior.”

The current definition specifically states,

“are $\frac{1}{4}$ or more degree Indian blood and recognized by the Secretary as being eligible for Bureau services.”

Background

Revise Definition of Student Eligibility

In 2012, during the JOM tribal consultation session, the definition of eligibility issue was also discussed. The question was stated as,

“What is an eligible JOM student?” BIE stated, “Per 25 CFR 273.12, eligible students are age 3 through grade 12 enrolled in public schools, except those enrolled in Bureau or sectarian operated schools. Such students must be (1) a member of a Tribe or (2) at least $\frac{1}{4}$ or more degree of Indian blood and recognized by the Secretary of the Interior as eligible for BIE services.”

Background

Revise Definition of Student Eligibility

- During the 2014 student count, the same student eligibility issue occurred again.
- In 2014, during the student count, the BIE sent out two Dear Tribal Leader (DTL) letters: Both letters provided a definition regarding student eligibility.
 - **The DTL letter dated July 24, 2014 stated:** *“American Indians age 3 through grade 12 who are enrolled in public schools are eligible if they are at least one fourth degree of Indian blood **and** recognized by the Secretary of the Interior as eligible for BIE services.”*
 - **The DTL letter dated December 2, 2014 stated:** *“American Indians age 3 through grade(s) 12 who are enrolled in public schools are eligible if they are either a member of a tribe **or** at least one fourth degree of Indian blood and also recognized by the Secretary of the Interior as eligible for BIE services.”*

CURRENT OPTION(S) BEING CONSIDERED:

Revise Definition of Student Eligibility

OPTION #1:

Revise the current student eligibility definition as provided at CFR §273.12 and replace it with, “*American Indians age 3 through grade 12 who are enrolled in public schools are eligible if they are either at least one fourth degree of Indian blood from an American Indian or Alaska Native group recognized by the Secretary; or an enrolled member of a American Indian or Alaska Native group recognized by the Secretary of the Interior as eligible for BIE services.*”

CURRENT OPTION(S) BEING CONSIDERED:

Revise Definition of Student Eligibility

OPTION #2:

Revise the current student eligibility definition as stated in 25 CFR §273.12 and replace it with, “American Indians age 3 through grade(s) 12 who are enrolled in public schools are eligible if they are either at least one fourth degree of Indian blood from an American Indian or Alaska Native group recognized by the Secretary; or an enrolled member of a American Indian or Alaska Native group recognized by the Secretary of the Interior as eligible for BIE services, or provide documentation of descendency indicating one-fourth degree Indian blood from a American Indian or Alaska Native group recognized by the Secretary.”

CURRENT OPTION(S) BEING CONSIDERED:

Revise Definition of Student Eligibility

OPTION #3:

Revise the current student eligibility definition as stated in 25 CFR §273.12 and replace it with?

COMMENT ON THE FOLLOWING TOPICS:

Revise Definition of Student Eligibility

Comment on using Option 1. BIE's proposed revised student eligibility definition.

Revise the current student eligibility definition as provided at CFR §273.12 and replace it with, *“American Indians age 3 through grade 12 who are enrolled in public schools are eligible if they are either at least one fourth degree of Indian blood from an American Indian or Alaska Native group recognized by the Secretary; or an enrolled member of a American Indian or Alaska Native group recognized by the Secretary of the Interior as eligible for BIE services.”*

COMMENT ON THE FOLLOWING TOPICS:

Revise Definition of Student Eligibility

Comment on using Option 2,

Revise the current student eligibility definition as stated in 25 CFR §273.12 and replace it with, “*American Indians age 3 through grade(s) 12 who are enrolled in public schools are eligible if they are either at least one fourth degree of Indian blood from an American Indian or Alaska Native group recognized by the Secretary; or an enrolled member of a American Indian or Alaska Native group recognized by the Secretary of the Interior as eligible for BIE services, or provide documentation of descendency indicating one-fourth degree Indian blood from a American Indian or Alaska Native group recognized by the Secretary.*”

COMMENT ON THE FOLLOWING TOPICS:

Revise Definition of Student Eligibility

Comment on using Option 3.

Revise the current student eligibility definition as stated in 25 CFR §273.12 and replace it with?

BIE is seeking comments, suggestions, and advice from program participants during consultation sessions.

CONSULTATION TOPIC

#4

**THE ESTABLISHMENT OF A
COMMON MEASURABLE
METRIC ELEMENT(S) FOR
ALL JOM PROGRAMS.**

COMMON MEASURABLE METRIC ELEMENT(S)

POTENTIAL ISSUE OR CHANGE:

How to determine a/an common objective performance measurement(s) to evaluate BIE's diverse JOM programs nationwide.

COMMON MEASURABLE METRIC ELEMENT(S)

REASON FOR PROPOSING ISSUE OR CHANGE:

The establishment of a/an objective measurable quantitative or qualitative metric element(s) that will provide all stakeholders with information of program gains and effectiveness for all JOM programs.



COMMON MEASURABLE METRIC ELEMENT(S)

CURRENT OPTION (S) BEING CONSIDERED BY THE BUREAU:

The establishment of a a/an objective measurable element(s) to evaluate the gains and effectiveness of a JOM program.

BACKGROUND

In 2013, an **American Indian Education Study Group** (*Study Group*) was formed to diagnose the systemic challenges facing the BIE.

- The *Study Group* proposed a plan for reform to ensure Indian students attending BIE-funded schools and programs receive a world-class education.

BACKGROUND

The Study Group drafted a framework titled, the *Blueprint for Reform (Blueprint)*, which was released on June 13, 2014.

- The *Blueprint* was based on 2013 consultation sessions with tribal leaders, Indian educators & others throughout Indian Country.
- It focused on (1) How to facilitate tribal sovereignty in American Indian education and; (2) How to improve educational outcomes for students in BIE-funded schools & programs.
- Based on the consultation recommendations Secretary Jewell issued a Secretarial Order to restructure the BIE from a direct provider of education into an innovative organization that will serve as a capacity-builder and service-provider to tribes with schools and programs funded by the BIE.
- One of the five goals in the *Blueprint* is to, “Build a responsive organization that provides resources, direction, and services to tribes so they can help their students **attain high levels of student achievement.**”

BACKGROUND

- The restructuring emphasized two outcomes:
 - (1) Improving responsiveness of BIE operational support to schools and programs; and
 - (2) Improving performance of individual schools and programs.
- In addition, Section 7 of the Secretarial Order recognized **Performance, Monitoring and Evaluation as a key piece to “ensure that progress is monitored toward the goal of American Indian children receiving a high-quality education that honors their culture, languages, and identities as Indian people.”**

BACKGROUND

There is a need to measure and to determine program performance with JOM programs.

- So that strategic decisions can build on existing strengths
 - We can develop new areas based on performance.
 - Measurements guide us to develop quality programs.
 - Measurements help to establish strategic program goals
 - Improves performance
 - Helps to guide budgets for cost-effectiveness
 - They measure successes or failures
 - Promotes program achievements to parents, students and stakeholders of the BIE's JOM program.
- 

CURRENT OPTION(S) BEING CONSIDERED:

OPTION #1: (ALL PROGRAMS)

STATEMENT OF OPTION

Ensure all approved JOM contracts provide written goals and objectives that are measurable and quantifiable for reporting purposes. Within each JOM annual report, a JOM program shall report on the outcomes of each Education Plan's stated goal(s) regarding program effectiveness, gains, successes or losses. The BIE will aggregate the data and report the program effectiveness, gains and losses from annual reports.

SUMMARY OF OPTION

- All JOM contracts must have measurable and quantifiable goals for reporting purposes.
- Report outcomes within the annual report
- Outcomes will be based on each program's Education Plan's stated goal(s) regarding program effectiveness (gains, successes or losses).

CURRENT OPTION(S) BEING CONSIDERED:

OPTION #2: (BASED ON BY REGIONS)

STATEMENT OF OPTION

For statistical analysis, using a random sampling, BIE will collect data from the JOM annual reports. The random collection of data will come from 10 percent of our region's JOM contractors. The BIE will determine the amount of program effectiveness, gains and losses from those selected annual reports. In order to determine program effectiveness, all approved JOM contracts must contain goals and objectives that are measurable and quantifiable for reporting purposes.

(For example, when BIE analyzes 10% of one of the region's JOM programs, BIE could state, "75 or 80 percent of the JOM contract programs rated the effectiveness of the JOM program as "extremely effective" in reaching the JOM goals and objectives").

SUMMARY OF OPTION

- BIE will collect data from the annual reports.
- Random sampling will be used
- Collection of data will come from 10% of our region's JOM contractors.
- The BIE will determine the amount of program effectiveness (gains, losses) from those selected annual reports.
- To determine program effectiveness, all JOM contracts must contain measurable goals & objectives that are quantifiable for reporting purposes.

CURRENT OPTION(S) BEING CONSIDERED:

OPTION #3: (BASED ON THE TYPE OF JOM PROGRAM)

STATEMENT OF OPTION

A combination of stratified and random sampling will be used for statistical analysis. Stratified sampling is a commonly used probability method that is superior to random sampling because it reduces sampling error. A stratum is a subset of the population that shares at least one common characteristic.

SUMMARY OF OPTION

- **BIE will collect data from the annual reports.**
- **Use both stratified & random sampling**
- **Stratified sampling is a
 - *probability method
 - *superior to random
 - *reduces sampling error**
- **Stratum = subset = shares = at least 1 common characteristic.**

CURRENT OPTION(S) BEING CONSIDERED:

OPTION #3: (BASED ON THE TYPE OF JOM PROGRAM)

STATEMENT OF OPTION

Examples of stratums for the JOM program might be language programs, culture programs, academic achievement programs, the amount of JOM funding generated by each JOM program (high, medium, low dollar programs)); or JOM programs based on the submitted student count (large, medium or small programs).

SUMMARY OF OPTION

Examples of stratums:

- Language programs
- Culture programs
- Academic achievement programs
- Amount of JOM funding generated by each JOM program (high, medium, low dollar programs)
- JOM programs based on the submitted student count (large, medium or small programs).

CURRENT OPTION(S) BEING CONSIDERED:

OPTION #3: (BASED ON THE TYPE OF JOM PROGRAM)

STATEMENT OF OPTION

The common thread will be to use the type of JOM program, such as language/culture, dropout prevention and academic achievement. The random collection of data will come from those three categories. When BIE analyzes data they will randomly collect data from 10-20 percent of the programs that are language/culture JOM programs; and collect information from 10-20 percent of dropout prevention JOM programs, and 10-20 percent of the academic achievement JOM programs. The BIE will aggregate the data and report the program effectiveness, gains and losses from the annual reports.

SUMMARY OF OPTION

- Data will be randomly collected
- Data will come from 3 various categories.
- Collect data from 10-20% of the selected categories.
- Data will be aggregated to report program effectiveness (gains/losses) from the annual reports.

COMMENT ON THE FOLLOWING TOPICS:
COMMON MEASURABLE METRIC ELEMENT(S)

1. What common qualitative measurable metric element(s) shall be used to measure program performance for BIE's nationwide diverse JOM programs?
 2. Shall there be one or more common performance measures to determine program performance?
 3. Shall the performance elements include quantitative and/or qualitative data only or both?
 4. When using an established common measurable metric element(s) how should they be applied to categories? By regions, type of programs, with all programs or a percentage of programs, etc.
- 

CONSULTATION

TOPIC #5

Revise the expired JOM Application Contract, form BIA-62116 and the JOM Annual Report, BIA-62218

Revise the expired JOM Application Contract form & the Annual Report

POTENTIAL ISSUE OR CHANGE:

It is necessary to revise and update the expired JOM Application Contract and Annual Report forms. Form revisions will contain simplified/clearer directions and will minimize the paperwork burden for JOM contractors.

Revise the expired JOM Application Contract form & the Annual Report

REASON FOR PROPOSING ISSUE OR CHANGE:

Twenty-two years ago, on July 31, 1993, the JOM Application Contract expired; and the Annual Report form expired on September 30, 1993. No revisions or updates have been implemented for either form.

Revise the expired JOM Application Contract form & the Annual Report

CURRENT OPTION(S) BEING CONSIDERED BY THE BUREAU:

The BIE proposes to update the expired forms; the JOM Application Contract form and the JOM Annual Report form.

BACKGROUND

- In 1993 the JOM Application Contract and the JOM Annual Report form expired
- Both forms have been outdated for the past 22 years. No other revisions or updates have been implemented for either form.
- It is the goal of BIE to be responsible and publicly accountable for reducing the burden of Federal paperwork on the public, and for others.
 - The **Paperwork Reduction Act (PRA)**, Pub. L. 96-511, was enacted to minimize the paperwork burden for individuals; small businesses; educational and nonprofit institutions; federal contractors; State, local and tribal governments; and other persons resulting from the collection of information by or for the Federal Government.

BACKGROUND

- Throughout the years the JOM application contracts and Annual Report forms that have been revised by various sites nationwide; and some have provided an electronic version of the expired application.
- For over 22 years we've seen changes in the work place such as new devices (Internet, email, technology).
- The JOM Application Contract and Annual Report form need to be updated to reflect the changes and reduce the burden of federal paperwork on the public.
- The BIE seeks to solicit comments, suggestions, and advice from program participants during consultation sessions about revising the JOM Application Contract and Annual Report forms.

CURRENT OPTION(S) BEING CONSIDERED

OPTION #1:

Form a committee to work on revising and updating the expired JOM Application Contract and JOM Annual Report forms. Using their knowledge of what part of the forms work, does not work, is no longer relevant, needs more clarity, needs to be expanded, etc.

OPTION #2:

BIE will revise and update the expired JOM Application Contract and JOM Annual Report forms **using the comments, suggestions, and advice from program participants during consultation sessions.**

Please comment on the following topics:

1. Shall the BIE form a committee to work on revising and updating the expired JOM Application Contract and JOM Annual Report forms?
2. Shall BIE revise and update the expired JOM Application Contract and JOM Annual Report forms by using the comments, suggestions, and advice from program participants during consultation sessions and written suggested sent to Washington DC?'
3. What part of the JOM Application Contract form needs to be revised? What sections of the form work? Does not work? Is no longer relevant? Needs more clarity? Needs to be expanded? All suggestions, comments, viewpoints and advice are welcomed.

Please comment on the following topics:

4. What part of the Annual Report form needs to be revised? What sections of the form work? Does not work? Is no longer relevant? Needs more clarity? Needs to be expanded? Any other suggestions, comments, or advice?

5. How can we ensure that both forms, the JOM Application Contract and JOM Annual Report forms complement and relate to each other to ensure that both forms provide optimal reporting information regarding program performance? These measurements will help establish and promote strategic program goals, improve performance, strategically to guide us on allocating budgets and to budget for cost-effectiveness, measure success/failure, and promote program achievements to parents, students and stakeholders of the BIE's JOM program.



**CONSULTATION
ITEM #6**

OPEN ITEM

CONSULTATION TOPIC:

Revision of

POTENTIAL ISSUE OR CHANGE:

To Be Determined

**REASON FOR PROPOSING ISSUE
OR CHANGE:**

To Be Determined

**CURRENT OPTION (S) BEING
CONSIDERED BY THE BUREAU:**

None