



**NORTH SLOPE BOROUGH SCHOOL DISTRICT
MEMORANDUM**

TO: Esther Evikana, President
Members of the Board

THROUGH: David Vadiveloo, Superintendent *D. Vadiveloo*

FROM: Nicholas Settle, Federal Programs Coordinator *N. Settle*
Nicholas Settle

DATE: April 6, 2026

SUBJECT: Board Policy Update – First Reading
BP 6174.3 Tribal Participation in Impact Aid
Determination and other Federal Programs

**Memo No. SB26-117
(Action Item)**

NSBSD Policy Manual:

Board Bylaw 9311, Board Policies:…Prior to adoption, policies shall normally be given two readings by the Board. At its second reading, the policy may be adopted by a majority vote of all members of the Board.

NSBSD Strategic Plan Summary: N/A – Federal Requirement

Recommendation:

Administration recommends that the Board approve the first reading of the revised Indian Policies and Procedures (BP 6174.3) as presented, incorporating federal guidance and consultation input, to ensure compliance with Impact Aid requirements.

Issue Summary:

This memo provides an update on the District’s Indian Policies and Procedures (IPP), consultation efforts with the Iñupiat Community of the Arctic Slope (ICAS), and required revisions based on feedback from the U.S. Department of Education Impact Aid Program.

The proposed updates are necessary to ensure full compliance with federal requirements under 34 CFR §222.94 and to maintain eligibility for Impact Aid funding. These revisions will also strengthen communication processes and formalize consultation procedures with ICAS and parents of Indian children.

Background:

Board Policy 6174.3 governs Tribal Participation in Impact Aid Determination and other federal programs. Federal law requires annual consultation with tribes and parents of Indian children and mandates that IPPs address six regulatory requirements with clear procedural detail.

Following submission of the District’s IPP, the U.S. Department of Education reviewed the document and identified areas requiring additional specificity, particularly related to communication methods, notification timelines, and procedural clarity.

On February 27, 2026, the District conducted an initial consultation with Mark Roseberry (ICAS representative) to review the current IPP and identify areas for improvement. A follow-up





consultation occurred on April 3, 2026, with Mark Roseberry, Corrine Danner, and Jeremy Kasak, who will serve as the ICAS consultation team moving forward.

Federal feedback, received on March 31, 2026, emphasized the need for:

- Defined communication methods
- Clear timelines for dissemination and notification
- Explicit procedures for gathering and responding to input
- Defined roles in decision-making and policy revision

Proposed Motion:

“I move that the NSBSD Board of Education approve the first reading of BP 6174.3 Tribal Participation in Impact Aid Determination and other Federal Programs as described in this memo SB26-117 and attachments.”

Moved by _____ Seconded by _____

Vote _____



**TRIBAL PARTICIPATION IN IMPACT AID DETERMINATION
AND OTHER FEDERAL PROGRAMS**

BP 6174.3 (a)

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

Attestations

The District attests that it has established Indian (Iñupiaq) 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 (Iñupiaq) lands. A copy of the current policies and procedures will be attached to the current year Impact Aid application.

The 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 (Iñupiaq) children prior to the submission of the current year's Impact Aid application.

Indian Policies and Procedures

The District's goal under the Indian (Iñupiaq) Policies and Procedures [IPP] is to ensure that all Indian (Iñupiaq) children of school age have equal access to all programs, services, and activities provided by the school district. The IPPs by intent and by Board action supersede all previous Board action and are intended to bind the Governing Board, administration, and staff of the NSBSD. Tribal Involvement. The following Indian policies and procedures become effective upon school board approval.

Disseminate Relevant Applications, Evaluations, Program Plans and Information

~~1. The District will disseminate relevant applications, evaluations, program plans and information related to the LEA's education program and activities with sufficient advance notice to allow tribes and parents of Indian (Iñupiaq) children the opportunity to review and make recommendations.~~

~~[34CFR222.94(a)(1)]~~

1.1 The District will disseminate information and seek timely input 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, Johnson O'Malley programming.

1.2 Dissemination will occur through active delivery methods, including but not limited to: email, U.S. mail, automated phone calls or text notifications, and materials sent home with students. Posting on websites, calendars, or public locations may supplement, but will not replace, active dissemination.

1.3 The completed applications, evaluations, and program planning will be made available to parents of Indian (Iñupiaq) children, Tribal officials, and the Federal Program Parent Advisory Committee (FPPAC) the District's Indian Education Committee. A summary of applications, evaluations and

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BP 6174.3 (b)

program planning will be prepared and disseminated one week in advance of public hearings. The FPPAC will meet three times per year in September or October; November or December; and in April or May 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 on the district calendar and posted one week in advance on locations that School Board meeting agendas are posted and on the District on-line calendar to allow all interested parties to attend. The September meeting will include reviewing the IPP; November/December meeting will include the Title VII-Impact Aid application and the District and School Report Cards; and the April/May meeting will include other Federal Programs.

All completed applications, evaluations, and program materials will be:

Emailed and/or mailed to Tribal officials and parents of Indian children at least one (1) week prior to public meetings, and provided at least two (2) weeks prior to ICAS consultation meetings

Preferred Communication Methods

1.4 Preferred Communication Methods

The District will annually consult with the Iñupiat Community of the Arctic Slope (ICAS) and parents of Indian children to determine their preferred methods of communication.

Until such preferences are formally documented, the District will utilize email and U.S. mail as the primary methods of communication.

Disseminate Relevant Applications, Evaluations, Program Plans and Information (Continued)

1.5 The completed applications, evaluations, and program planning will be made available to parents of Indian (Iñupiaq) children, Tribal officials, and the Iñupiat Community of the Arctic Slope (ICAS), the Federally Recognized Regional Tribal Government. A summary of applications, evaluations and program planning will be prepared and disseminated two weeks in advance the scheduled November or December ICAS meeting prior to the Title VII-Impact Aid application to provide an opportunity for meaningful consultation; and the District and School Report Cards. A summary of 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, and Johnson O'Malley programming will be prepared and disseminated two weeks in advance of the scheduled March or April ICAS meeting to provide an opportunity for meaningful consultation.

1.6 Parents of Indian (Iñupiaq) children, tribal officials, the FPPAC (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 (Iñupiaq) students on an equal basis in the district.

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

Opportunity for Input

2.0 The District will provide an opportunity for the Iñupiat Community of the Arctic Slope (ICAS), the Federal Recognized Regional Tribal Government, and parents of Indian (Iñupiaq) children to

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BP 6174.3 (c)

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.~~ Tribal officials and parents of Indian children will be notified of consultation opportunities and meetings via email and/or mail at least one (1) week in advance.

[[34CFR222.94\(a\)\(2\)](#)]

Notify tribes and the parents of Indian (Iñupiaq) children of the opportunity to submit comments and recommendations, considering the tribe's preference for method of communication, and Modify the method of and time for soliciting Indian (Iñupiaq) views, if necessary, to ensure the maximum participation of tribes and parents of Indian (Iñupiaq) children.

- 2.1 The District FPPAC (Indian Education Committee) will meet three times per year for the purpose of addressing comments and concerns of parents of Indian (Iñupiaq) children regarding the District's educational programs and activities. The meeting agendas are posted and all meetings are open to the public allowing for tribal officials as well as parents of Indian (Iñupiaq) children the opportunity to submit comments and recommendations for consideration.
 - 2.2 At each of the monthly 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 (Iñupiaq) students. In addition, two public hearings are scheduled in January and May 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 (Iñupiaq) children will be seriously considered.
 - 2.3 Information will be included in student handbooks/enrollment packets regarding opportunities to provide input to the District.
 - 2.4 The District representatives will schedule meetings with the Iñupiat Community of the Arctic Slope (ICAS), the Federally Recognized Regional Tribal Government to discuss ongoing programming goals.
 - 2.5 The District will consider and utilize the preferred methods of communication identified by ICAS and parents and will modify communication methods and meeting schedules, as necessary, to ensure maximum participation.
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Equal Participation

- 3.0 The District will annually assess the extent to which Indian (Iñupiaq) children participate on an equal basis with non-Indian (non-Iñupiaq) children in the District's education program and activities.

Results of the annual evaluation of Indian (Iñupiaq) children's participation will be distributed to ICAS and parents of Indian (Iñupiaq) children at least one (1) week prior to meetings or opportunities for feedback.

The District will ensure that sufficient time is provided for meaningful review and comment prior to decision-making.

[[34CFR222.94\(a\)\(3\)](#)]

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BP 6174.3 (d)

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

- 3.1 The District shall annually calculate from its records the ratio of Indian (Iñupiaq) children compared to other children participating in academic and co-curricular programs ("school data").
- 3.2 Annually, the District Board of Directors will hold a meeting to assess the extent of Indian (Iñupiaq) children 's participation in the educational program. At such meeting, attendees will analyze the academic and co-curricular programs school data and Tribal/parental commentary to determine the extent of equality of Indian (Iñupiaq) children's participation with other children.
- 3.3 The District will disseminate the results of the assessment of Indian (Iñupiaq) participation to parents of Indian (Iñupiaq) children and tribal officials within one week of the approved minutes of the Board meeting through posting on established posting locations and on the district website.
- 3.4 Parents of Indian (Iñupiaq) children or tribal officials may comment on the results at regularly scheduled school board meetings, FPPAC (Indian Education Committee) meetings and directly to the school district by (phone, email, writing, etc.). In addition, parents of Indian (Iñupiaq) children and tribal officials may comment, including through a questionnaire, requesting information concerning their views as to the extent of Indian (Iñupiaq) children's participation in educational programs on an equal basis with other children.
- 3.5 The Board may establish a task force or an ad hoc committee of Indian (Iñupiaq) parents, Tribal officials, and staff members to assist in the modification of educational programs in order to ensure the equal participation of Indian (Iñupiaq) children. Such committee shall make recommendations to the Board as to any needed modifications. The Board shall give appropriate deference to the suggestions of the committee in voting on proposed modifications.

Modifying IPPs

- 4.0 The District will modify the IPPs if necessary, based upon the results of any assessment or input described in this document.
[\[34CRF222.94\(a\)\(4\)\]](#)
- 4.1 Annually the District FPPAC (Indian Education Committee) will review and if necessary revise the Indian Policies and Procedures. The document will be forwarded to the North Slope Borough School Board, which retains final authority to determine whether revisions to the IPPs will be adopted, as well as the tribal officials and through the School Board meeting agenda to the parents of Indian (Iñupiaq) children for review and consideration. If necessary, the FPPAC (Indian Education Committee) may suggest revisions at other times of the year as appropriate. Any updates will be posted on the District website within two weeks of adoption by the Board.
- 4.2 Tribal officials and parents of Indian children may submit recommendations for changes to the IPPs through: FPPAC meetings, School Board meetings, written communication (email or mail), and direct consultation meetings.

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BP 6174.3 (e)

4.3 Approved changes to the IPPs will be implemented immediately upon Board approval unless otherwise specified by the Board. Tribal officials and parents of Indian children will be notified of approved changes via email and/or mail.

Responding to Comments

5.0 The District will respond in writing to comments and recommendations prior to submission of the Impact Aid application and will disseminate responses through Board agendas, board minutes, and direct communication (email and/or mail).

[[34CRF222.94\(a\)\(5\)](#)]

5.1 The North Slope Borough School District will at least annually respond in writing to comments and recommendations made by the Federal Program Parent Advisory Committee (Parent Advisory Committee), tribal officials, or parents of Indian (Iñupiaq) children, and disseminate the responses to all parties through the official Board Agenda and or Board Minutes prior to the submission of the IPPs by the District.

Dissemination of Indian Policies and Procedures

6.0 The District will provide a copy of the IPPs to the affected tribe or tribes annually, and prior to submission of the Impact Aid application. Distribution will occur via email and/or mail to ICAS and relevant stakeholders. [[34CR F222.94](#) (a)(6)]

6.1 The North Slope Borough School District will annually provide a copy of the current Indian Policies and Procedures to the Iñupiat Community of the Arctic Slope by mail and/or email (hard copy and/or digitally).

(cf. [1230](#) - Citizen Advisory Committees)

(cf. [1231](#) - Federal Programs Parent Advisory Committees)

(cf. [6174.2](#) - Public Participation in Impact Aid Determination)

(cf. [8200](#) - Powers and Duties)

Legal Reference:

UNITED STATES CODE

Elementary Secondary Education Act

([34 CFR222.94](#) (a)(1))

([34 CFR 222.94\(a\)\(2\)](#))

([34 CFR 222.94\(a\)\(3\)](#))

([34 CFR 222.94\(a\)\(4\)](#))

([34 CFR 222.94\(a\)\(5\)](#))

([34 CFR 222.94\(a\)\(6\)](#))

Adopted 06/02/08

Reviewed 02/04/10

Revised 01/11/18

Reviewed 11/10/18

Revised 04/04/26

Revised __/26

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