Answered Questions

Q: Where can I email any questions?

A: You can email additional questions to <u>OIE.EASIE@ed.gov.</u>

Q: Can the 506 form be translated into Spanish? Or is it available in Spanish for us to share with students?

A: The ED 506 form is an OMB approved form and cannot be altered. OIE will take your suggestion under consideration for the next revision after the current form expires in 2023.

Q: Since it is a fillable PDF form, can an electronic signature be used?

A: Yes, you may use electronic signatures.

Q: Do students need to reapply before each collection period or once they are determined to be eligible; are they good for all future collection periods?

A: A new form does not need to be filled out each period. Once a child is determined to be eligible to be counted for Title VI program services, the applicant shall maintain a record of such determination and shall not require a new or duplicate determination form to be made for such child for a subsequent application for this grant.

Q: Where can I download the slides from today's presentation?

A: The slides for today's EASIE ED 506 Form SY 2021-22 Webinar will be available after the webinar concludes <u>here</u>.

Q: Is there any official list of Tribes that meet the definition of Organized Indian Group?

A: • Federally Recognized - an American Indian or Alaska Native Tribal entity that is recognized by the DOI. The DOI maintains a list of federally recognized Tribes, available on the DOI's website or OIE can provide you the link upon request.

• State Recognized - an American Indian or Alaska Native Tribal entity that has recognized status by a State. The U.S. Department of Education does not maintain a master list. It is recommended that you use official state websites only.

• Terminated Tribe - a Tribal entity that once had a federally recognized status from the United States Department of Interior and had that designation terminated after 1940.

• Alaska Native – An Eskimo, Aleut, or other Alaska Native who does not fall into one of the other categories listed.

• Organized Indian Group - Member of an organized Indian group that received a grant under the Indian Education Act of 1988 as it was in effect until October 19, 1994.

Q: What if I have inherited forms (from previous director) that are not completely filled out?

A: Per EASIE Part I FAQ Section 11.6, "Before submitting a valid Indian student count, the applicant should review their ED 506 Forms on file to confirm that all the required information is filled out completely for each student that is enrolled during the count period. If any of the ED 506 Forms' information is missing or unknown, it should not be included in the count."

Q: Can someone put in chat the link to get the updated form?

A: The current ED 506 form can be found here.

Q: Can Indian Students with Tribal memberships with Canadian Tribes be included in the Student Count?

A: The Title VI Indian Education Formula Grant is only for American Indian and Alaskan Native students who meet the definition of Indian as defined in section 6151 of the ESEA.

Q: How long should we retain the 506 forms for documentation purposes?

A: Per OIE, "Program records, including ED 506 Forms, must be kept for three years after the end of the project period unless outstanding audit findings are unresolved. Student records must be destroyed, not just thrown away."

Q: Who is the Northwest representative?

A: Dr. Marie Julienne is the program officer for Northwest Region: Marie.Julienne@ed.gov.

Q: Can we accept an electronic signature of the parent or guardian due to COVID? If so, will you change or modify the 506 form to include an electronic signature?

A: The EASIE ED 506 Forms have been updated to include electronically fillable fields. The electronic form is located on our Communities of Practice website <u>here</u>.

Q: "Step-children" who have no lineage cannot be claimed, correct?

A: The child needs to be a Tribal member. They can also be in the lineage of a Tribal member as shown in the presentation.

Q: What is the cutoff date for counting 506 forms?

A: The count period must be consecutive (calendar) days and may be from 1 to 31 consecutive (calendar) days beginning no earlier than the first day of the current school year and ending no later than the date on which Part I is submitted.

Q: Do Bureau schools require parents to complete an ED506 form?

A: BIE schools may use either the ED 506 form count or the ISEP count. See the below section from the EASIE Part I FAQ.

"BIE schools may use either the Indian School Equalization Program (ISEP) count or the ED 506 Form count to verify their Indian student count. BIE schools that enter an ISEP count must use the most current Indian student count certified by the BIE."

Q: What date can BIE-funded schools use for their Indian student count period?

A: For BIE-funded schools that enter an ISEP count, the applicant must enter their most current Indian student count data certified by the Bureau of Indian Education. If the date the ISEP count was taken does not match the timeframe of the application (31 days), OIE recommends BIE funded schools use the dates of October 1-31.

Q: Can my school request for a copy of the ED 506 form?

A: The ED 506 Form can be found here.

Q: How many 506 forms are required to apply for Title VI?

A: An ED 506 form should be completed for each eligible student unless the student is included in an ISEP count at a Bureau-funded school.

Eligible applicants must have a minimum of 10 eligible Indian student enrolled in the LEA during a specific count period, or not less than 25 percent of the total number of individuals enrolled in the schools of the LEA. The minimum requirement does not apply in Alaska, California, or Oklahoma, or with respect to LEAs located on, or in proximity to, a reservation. For more information, download the FAQs Part I <u>here</u>.

Q: In stating that a new form is not needed for each period is a fiscal year considered the period you are referring to?

A: Per the EASIE Part I FAQs Section 12.2, "A new ED 506 Form does NOT have to be completed each year of enrollment in the LEA as long as a signed, completed form is on file and there is documentation that the student was enrolled during the count period."

Q: I am not understanding what is needed if a Tribal membership number is unavailable.

A: Tribal enrollment criteria are set forth in Tribal constitutions, articles of incorporation or ordinances. The criterion varies from Tribe to Tribe, so uniform membership requirements do not exist. Each Tribe determines whether an individual is eligible for membership and maintains its own enrollment records and records about past members. Some Tribes require conditions such as Tribal blood quantum, Tribal residency, or continued contact with the Tribe.

To obtain information about Tribal enrollment documentation, you must contact the Tribe. More information about the Tribal enrollment process can be found on the U.S. Department of Interior's website <u>here</u>.

Q: Is there a website/place where I can see a list of what is acceptable as "other evidence of membership?"

A: To obtain information about Tribal enrollment documentation, you must contact the Tribe. More information about the Tribal enrollment process can be found on the U.S. Department of Interior's website <u>here</u>.

Q: The form is fillable, but can it be downloaded and completed for signature? A: Yes. Applicants can still download and sign in ink OR with a "wet" signature as necessary.

Q: How long should we retain the 506 forms for documentation purposes?

A: Per OIE, "Program records, including ED 506 Forms, must be kept for three years after the end of the project period unless outstanding audit findings are unresolved. Student records must be destroyed, not just thrown away."

Q: To be clear, once a student has applied and determined to be eligible, no more documentation is required for that student for subsequent years?

A: A new ED 506 Form does NOT have to be completed each year of enrollment in the LEA as long as a signed, completed form is on file and there is documentation that the student was enrolled during the count period. Once an Indian child is determined to be eligible to be counted

for a grant award, the applicant shall maintain a record of such determination and shall not require a new or duplicate determination (or form) to be made for such child for a subsequent application for this grant.

Q: What if you have Native Hawaiian students, can they be counted?

A: Native Hawaiians are served under other ED grant programs, but NOT Title VI, Part A - the Formula program managed by OIE.

Q: Can a student be counted if he/she was enrolled last semester, but not this semester?A: An applicant should only include ALL students enrolled in/with your entity during the Indian Student Count period.

Q: Can someone expand a little more on the question about the cutoff date for counting 506 forms? Please give examples of what the count period could look like.

A: The Count period is established by the applicant and conducted annually. See the FAQs Part I on Student Count Information found on Community of Practice website <u>here</u>.

Q: Let's say a student with a valid 506 form transfers to another district. Can the same 506 form be transferred to be used and the student services change the district name and new address of the student?

A: It depends on the LEA or applicant's policy. whether that form can be reused. A new ED 506 Form does NOT have to be completed each year of enrollment in the LEA as long as a signed, completed form is on file and there is documentation that the student was enrolled during the count period. Once an Indian child is determined to be eligible to be counted for a grant award, the applicant shall maintain a record of such determination and shall not require a new or duplicate determination (or form) to be made for such child for a subsequent application for this grant.

Q: Since the 506 form does not have to be completed every year, a form filled in grade school for a student who is now in high school is still valid even though the expiration on the form has passed?

A: A new ED 506 Form does NOT have to be completed each year of enrollment in the LEA as long as a signed, completed form is on file and there is documentation that the student was enrolled during the count period. Once an Indian child is determined to be eligible to be counted for a grant award, the applicant shall maintain a record of such determination and shall not require a new or duplicate determination (or form) to be made for such child for a subsequent application for this grant.

Q: I have another question about eligibility of Native Hawaiians and the Freedmen recognized in some Tribes.

A: Children are eligible to receive services if they meet the definition of "Indian" as defined in section 6151 of the ESEA and have a completed Indian Student Eligibility Certification Form, "ED 506 form", or are included in an Indian School Equalization Program (ISEP) count. Determining whether a child meets this definition is sometimes difficult and depends on information presented by a parent or guardian responsible for the child.

The Title VI grant is only for American Indian and Alaskan Native students enrolled in a Federal or State recognized Tribe - as verified by a Tribe's membership office. The Native Hawaiians are served under a different program office within the Department of Education. Native Hawaiian students cannot be included in the Indian student count.

Q: Does a public school adhere to the grant schools count period? Or vice-versa? In order for a public school to use the grant schools ISEP count.

A: You, the applicant, establish the Indian student count period. A public school cannot use a BIE grant schools ISEP count. If this question refers to two separate types of schools in a consortium for example, then all count periods must be the same period at each level; each entity must have the same exact dates/window for the Indian Student Count period. A public education entity cannot use an ISEP counting procedure – ISEP is only for Bureau affiliated schools.

Q: If we have a completed 506 form on a student and that student transfers to another school, then a year later comes back to our school, do we need a new 506 form or can we use the one from the previous year?

A: A new ED 506 Form does NOT have to be completed each year of enrollment in the LEA as long as a signed, completed form is on file and there is documentation that the student was enrolled during the count period. Once an Indian child is determined to be eligible to be counted for a grant award, the applicant shall maintain a record of such determination and shall not require a new or duplicate determination or form to be made for such child for a subsequent application for this grant.

Q: What if the parent/guardian does not wish to give out an enrollment number? They want to fill out the form, just don't want to put the number down.

A: To obtain information about Tribal enrollment documentation, you must contact the Tribe. More information can be found <u>here</u>.

Must write name/band address of where tribal membership information is maintained.

FORMS.—The form described in subsection (a) shall include—

1. either—

(A)(i) the name of the tribe or band of Indians (as defined in section 6151) with respect to which the child claims membership;

- 1. the enrollment number establishing the membership of the child (if readily available); and
- 2. the name and address of the organization that maintains updated and accurate membership data for such tribe or band of Indians; or

(B) the name, the enrollment number (if readily available), and the name and address of the organization responsible for maintaining updated and accurate membership data, of any parent or grandparent of the child from whom the child claims eligibility under this subpart, if the child is not a member of the tribe or band of Indians (as so defined);

Q: How does the number of 506 forms counted determine funding for the school? Is there a percentage of eligible Native students that have to be met versus overall enrollment of the LEA?

A: Even though project objectives may span multiple years, grant awards are made on an annual basis. There are several factors that affect award amounts for grantees:
The number of Indian students counted in Application Part I and approved (or corrected) by OIE

• The minimum grant amount, which is set at \$4,000

• The state per pupil expenditure for that applicant. (If a state's per pupil expenditure is less than 80 percent of the national average, then 80 percent of the national average is used.)

• The amount of the Title VI appropriation for the fiscal year

Q: If our question is not answered here, who can I follow up with?

A: Contact <u>OIE.EASIE@ed.gov</u>

Q: Most Tribes will not give out information such as an enrollment number with the consent of a parent/guardian. Then what can be done to get this information?

A: As stated on the ED 506 Form, a Tribal membership number is not required to complete the form.

Q: What if there is not an email for the parent?

A: If there is not an email for the parent, then the parent should write in Not Applicable (N/A) in that section.

Q: If a family chooses to participate in a given year, then chooses not to participate in a subsequent year, and then chooses to participate in a future year ... how would the 506 form requirements work? A: Follow the school district's policy on maintaining/handling the ED 506 forms' recordkeeping.

Q: This 506 ED form is filled out by the parent so do we help them?

A: Parents/Grandparents/Legal Guardians attest to filling and signing the ED 506 form. Assistance (if any) i.e., Tribe's mailing address can be provided. More information can be found <u>here</u>. Another resource is the National Congress of American Indians Tribal Directory list found <u>here</u>.

Q: How can we document lineage if the grand parent's birth certificate is unavailable?

A: To obtain information about Tribal enrollment documentation, you must contact the Tribe. More information can be found at <u>here</u>.

Q: Can the 506 form be downloaded and then uploaded to send via email to the school? A: Yes, the ED 506 form can be downloaded. The Department of Education (ED) accepts electronic signatures. Follow the school district's policy and procedures for accepting electronic documents (signatures) to be uploaded to the school database. See EASIE Part I FAQ Section 12.3 here.

Q: Our parents have great difficulty providing the Tribe's address. What can we do?
 A: More information can be found <u>here</u>. Another resource is the National Congress of American Indians Tribal Directory list found <u>here</u>.

Q: Is this the 1st year that an LEA is required to have official policy/ procedure and SOP in place? A: The school district is responsible for setting policy/procedures in administrating daily SOPs.

Q: If a parent or guardian fills out only pertinent information, not knowing the Tribal Affiliation address or the enrollment number, is it acceptable for the SD Indian Ed Director to complete the information on the form to complete it?

A: Parents/Grandparents/Legal Guardians attest to filling and signing the ED 506 form. Assistance (if any) i.e., Tribe's mailing address can be provided. More information can be found <u>here</u>. Another resource is the National Congress of American Indians Tribal Directory list found <u>here</u>.

Q: Our school district has the ED 506 form available on our website. Is this a form that needs to now be updated, because it is available as a fillable form?

A: Use the most current ED 506 form with the expiration date of 4/30/2023. Note: The ED 506 form is an OMB approved form and cannot be altered in any way (i.e., it is not allowed to add school or district logos/branding on any electronic or hard copy version of the ED 506 form). Please use the provided and OIE approved, fillable and electronically signable ED506 .pdf version.

Q: When submitting students, do we submit students that were in attendance in this school year or just currently active students?

A: Review and download FAQs Part I Student Count Information found <u>here</u>. Each entity must have an Indian Student Count period of 31 days.

Q: Are we allowed to digitize these forms and keep them in an electronic file, or do we have to keep paper forms on file?

A: Follow your district's policy and procedures in filing and maintaining electronic documents.

Q: How can I help our families who are wanting to fill out the 506 forms, but who have adopted children with little or no lineal/Tribal information?

A: More information can be found <u>here</u>. Another resource is the National Congress of American Indians Tribal Directory list found <u>here</u>.

Q: Will it be acceptable to complete our Public Hearing via Zoom or via Survey?

A: Title VI applicants are still required to conduct a Public hearing and must widely publish a notice of that hearing prior to the actual hearing; this (these) session(s) can be held via phone/teleconference or web-conference.

Q: Are there any tips and tricks people have to encourage parents to complete these forms?

A: We encourage program leaders to work with their entity's community outreach/communications team to develop a viable strategy to increase outreach and information to parents for completing ED 506 forms.

Q: Our parents have great difficulty providing the Tribe's address. What is your guidance to resolve this issue?

A: More information can be found <u>here</u>. Another resource is the National Congress of American Indians Tribal Directory list found here.

Q: Do we keep an electronic file or a physical file?

A: Follow your district's policy and procedures in filing and maintaining electronic documents. Add additional language of requirements for 3 years archived documents on file.

Q: Do we count the 506 forms that are completed up through March 11, 2021, as long as we wait until March 11 to submit our application?

A: Review and download FAQs Part I Student Count Information found <u>here</u>.

Q: If parents complete the form electronically, are completed forms somehow sent to us?

A: The entity applying for the grant should provide instructions to the families on how to submit the electronic fillable ED 506 form to the entity program leaders.

Q: Is Part I of the application just providing a count according to our 506 forms?

A: The PPT slide-deck for today's EASIE ED 506 Form SY 2021-22 Webinar will be available after the webinar concludes <u>here</u>.

Q: Can we upload the fillable 506 form to our enrollment website so parents can complete it at the time of enrollment?

A: Yes, the ED 506 form can be downloaded. The electronic form is located on our Communities of Practice website at: https://easie.grads360.org/#communities/pdc/documents/9670. Note: The ED 506 form is an OMB approved form and cannot be altered in any way (i.e., it is not allowed to add school or district logos/branding on any electronic or hard copy version of the ED 506 form).

Q: Can we use the "Title VII Student Eligibility Certification" form in place of the 506? Our school also has a local Tribal verification form the parents fill out at the beginning of the school year.

A: The Title VI Indian Student Eligibility Certificate form is the ED 506 form. The ED 506 form is the required form that needs to be filled out for the Title VI grant.

Q: Which address is most appropriate for parents to include on the form if their mailing address is different from their physical address?

A: This is a parent/guardian decision.

Q: Will the **Consortium Agreement** and parent forms be fillable as well on Grads360 (Communities of Practice)? Is this a new form as of this year?

A: OIE will take into consider publishing a Consortium Agreement fillable form. The Indian Parent Committee Approval form is a fillable form this year SY 2021-22.

Q: Is there a specific number of students or student count to qualify a non-BIA/BIE school to apply for Title VI?

A: It depends on the State in question. Review and download FAQs Part I Student Count Information found <u>here</u>.

Q: What additional documentation need to be submitted with the application to verify eligibility of information on the 506 form

A: It depends on the specific student's situation; please review and download the FAQs Part I Indian Student Eligibility found <u>here</u>.

Q: Is the ED 506 form the same as the form required for Impact Aid?

A: No. OIE Title VI and Impact Aid are two separate federal grants or funding programs, each has their own separate requirements.

Q: What is the acceptable count period?

A: 31 consecutive days. For more information, review and download FAQs Part I Student Count Information found <u>here</u>.