



Johnson O'Malley (JOM) Student Count Guidelines

Congress decides the level at which JOM is funded. It is incumbent on the Bureau of Indian Education (BIE) to request the funds needed to adequately support the JOM program. BIE recommends appropriate funding levels for the program based on the *most recent determination of the number of eligible American Indian/Alaska Native students served*. Using a funding formula, BIE allocates funds to contracted grantees based on their student counts. In the case of the Arizona Department of Education (ADE), this count is based on a consolidated count for ADE's JOM subcontracts: 26 school districts and 2 tribes.

Prior to the 2023-2024 school year, grantee student counts were locked at the 1995 BIE student count, however this was changed per the 2018 JOM Modernization Act, **Public Law 115-404**. This act directed an accurate and comprehensive student count for the purposes of calculating JOM allocations. As a result, beginning with the 2023-2024 school year, funding was based on the updated student counts.

Each year, BIE requests a count of eligible JOM students. On September 26, 2023, BIE's annual reporting guidance stated student counts will be due by September 15th. ADE will collect all counts by August 30th to meet BIE's September deadline. In addition to this eligible student count, ADE requests grantees provide a count of potential students. Potential students include students who are identified as American Indian/Alaska Native, but do not currently have the documentation to verify their JOM eligibility. These *potential* students should be encouraged to complete the tribal enrollment/Certificate of Indian Blood (CIB) certification process to provide them more program options. For information on JOM eligibility requirements, reference the program information at the Office of Indian Education (OIE) JOM website, <https://www.azed.gov/oie/johnson-omalley-jom->.

ADE's guidelines for conducting the annual JOM student count are as follows:

- Collect eligible student data during the year. Provide a student count to ADE by August 30th. ADE will consolidate all grantee counts to submit to BIE by September 15th.
- Provide the number of eligible and potential students, by school and grade. The student count collection form is available at the OIE JOM website (see link above).
- Use the highest student count available for the year prior to the August 30th due date.
- Any American Indian/Alaska Native students that do not have documentation available to prove their JOM eligibility should be counted as **potential** students for ADE's count.