



Higher Learning Commission
A commission of the North Central Association



Distinctive and Connected

Tribal Colleges and Universities
and Higher Learning Commission
Accreditation —
Considerations for HLC Peer Reviewers

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DISTINCTIVE AND CONNECTED

Tribal Colleges and Universities and Higher Learning Commission Accreditation – Considerations for HLC Peer Reviewers

THIS DOCUMENT'S PRIMARY PURPOSE is to provide important context for Higher Learning Commission peer reviewers who may not be familiar with the unique characteristics of Tribal Colleges and Universities (TCUs). The material presented here also contains some considerations that may be helpful for peer reviewers in terms of what types of evidence to review in order to ascertain that TCUs are meeting the Commission's Criteria for Accreditation. The Higher Learning Commission is committed to promoting a solid understanding of the unique role of the TCUs and their contribution to higher education among its members, and particularly those who serve as peer reviewers. In some places, specific comments are offered to the team to provide additional guidance. As with any evaluation, the team will need to determine whether the institution is aware of and has the capacity to address any identified challenges; understanding the unique attributes of Tribal Colleges may assist the team in making these judgments.

All TCUs are aware that all institutions must meet HLC accreditation requirements to obtain and maintain status. However, the challenge for the peer reviewer is in applying and interpreting the Eligibility Requirements and Criteria in the unique history, mission, culture, and circumstances of the TCUs.

Part 1:

TRIBAL COLLEGES AND UNIVERSITIES DEFINED



SINCE THE BEGINNING, Tribal Colleges and Universities have been a study in American Indian tenacity of spirit (Pember, 2012). A combination of historical, economic, social, demographic, and educational forces has shaped the challenges and constraints that American Indians face. Higher education has not always met the needs of American Indian populations owing to the traditional, cultural, social, and economic issues, pedagogical approaches, and measures of success. More than a third of all American Indian students are 30 years of age or older, which puts them at risk for dropping out prior to earning a degree. However, TCU students and the colleges contribute to the social health of reservation communities (IHEP, 2007).

Today there are 37 Tribal Colleges and Universities serving more than 20,000 students throughout the United States. More than 75% of the TCUs are in the Higher Learning Commission's region and hold candidate or accredited status with the Commission. Since they were first founded, the number of Tribal Colleges has quadrupled and continues to grow; Indian student enrollments have risen by more than 370 percent.

— Resource: <http://aihec.org> (Tribal Colleges and Universities Map)

Understanding the Context

- **Federal Definition** — Under federal law, a “tribal college and/or university” is “an institution that qualifies for funding under the Tribally Controlled College or University Assistance Act of 1978 (TCU Act) (25 U.S.C. 1801 et seq.); Diné College, authorized in the Navajo Community College Assistance Act of 1978 (25 U.S.C. 640a note); or is cited in section 532 of the Equity in Educational Land-Grant Status Act of 1994 (7 U.S.C. 301 note). To qualify for funding under the TCU Act, an institution of higher education must: (1) be chartered by the governing body of a federally recognized Indian tribe or tribes; (2) have a governing board composed of a majority of American Indians; (3) demonstrate adherence to stated goals, a philosophy, or a plan of operation which is directed to meeting the needs of American Indians; (4) if in operation for more than one year, have students a majority of whom are American Indian; and (5) be accredited, or have achieved candidacy status, by a nationally recognized accreditation agency or association. Thirty-two TCUs have been designated by the U.S. Congress as land-grant colleges through the Equity in Educational Land-Grant Status Act of 1994” (AIHEC, 1999).
- **Balance of Multiple Roles** — The TCUs juggle a number of roles for their tribe and their community and constituents. They must essentially cultivate an effective marriage between their role as an institution of higher education and their being good stewards of their native culture.

- **Common Elements** — Collectively called “Tribal Colleges and Universities,” these institutions are in varying stages of development, and differ in their structures, sizes, and other characteristics. Nevertheless, they share some basic commonalities:
 - Most TCUs are less than 25 years old;
 - Most have relatively small student bodies that are predominantly American Indian;
 - Most are located on remote reservations, with limited access to other colleges. Their rural isolation also compounds their limited access to other resources and services;
 - Most were chartered by one or more tribes, but maintain their distance from tribal governments;
 - All have open admissions policies; and
 - All began as two-year institutions (AIHEC, 1999).

- **Role of TCUs** — Often located in the poorest communities in the nation, the TCUs serve first generation students who are juggling their studies with their family and financial responsibilities. TCUs strive to combine the best of both worlds (tribal and Western) for their students. Maintaining a healthy balance is critical to their success. They want to develop Indigenous students who can serve both tribal and non-tribal communities with new skills and abilities. They employ various strategies: they work with elders on new initiatives; develop new relationships between Indians and non-Indians; expand strategic partnerships between Indian and non-Indian organizations; and create curriculum that meets academic standards and includes rich Indigenous content (Bowman, 2009).

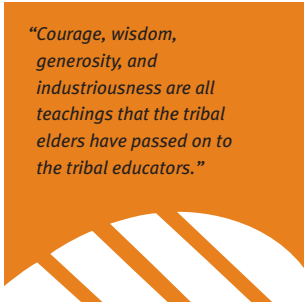
- **Vision of TCUs** — The TCU presidents say it is important for them and their colleges to understand the local communities and their traditions. Community knowledge includes political, social, and family. Traditional knowledge includes the ancient cultural and linguistic foundations of contemporary traditional tribal people (Bowman, 2009).

- **Mission of TCUs** — In his report for the Carnegie Foundation entitled, “Native American Colleges: Progress and Prospects,” author and researcher Paul Boyer stated that tribally controlled colleges are crucial to their communities’ economic, cultural, and spiritual survival.
 - Tribal colleges establish a learning environment that supports students who have come to view failure as the norm in any non-indigenous educational system.
 - Tribal colleges celebrate and help sustain American Indian traditions.
 - Tribal colleges provide essential services that enrich surrounding communities.
 - Tribal colleges have become centers for research and scholarship that directly benefit their communities and tribes’ economic, legal, and environmental interests (Stein, 2001).

- **Culture and Traditions** — Frequently, classes are taught by tribal elders and other non-traditional faculty members. Faculty have developed innovative curricula and teaching methodologies and the colleges have become centers of Indian research and scholarship. Tribal Colleges also work to instill an appreciation of tribal culture in non-Indian faculty

members through required professional development and cultural awareness programs. Moreover, the colleges have become essential repositories of tribal knowledge. In many of these cases, the libraries function as tribal archives. They collect documents and records that used to be kept elsewhere and record oral histories from tribal elders (AIHEC, 1999).

- **Role of the Elders** — The Native American educational approaches are rooted in tribal knowledge and are derived from the teachings of their ancestors. Courage, wisdom, generosity, and industriousness are all teachings that the tribal elders have passed on to the tribal educators. TCUs are responsible for teaching their people about their relationship with the land, to be a Good Ancestor, and be dedicated to the self-determination of Indian people and the sovereignty of Native nations (Crazy Bull, 2012). The role of the TCUs and their elders demonstrates their commitment to and respect for oral tradition as a critical resource.
- **Community Programs and Services to the Tribe** — More than 46,000 community members rely upon TCU services, which include libraries, job training and health programs, and Head Start and youth programs (Paskus, 2012).
- **Additional Challenges and Opportunities** — Leaders within the Tribal College movement have a wide range of concerns for the future:
 - Changes in Native populations;
 - Maintaining and growing ties with culture, language, and traditional values;
 - Keeping up with technology;
 - Protecting and managing natural resources;
 - Encouraging entrepreneurship;
 - Finding a true niche in higher education; and
 - Instilling passion within students and future Tribal College leaders (Pember, 2012).
- **Regional Accreditation** — Regional accreditation is a top federal priority; it is required for colleges and universities to be eligible for federal resources, as well as for voting membership in the American Indian Higher Education Consortium (AIHEC).
- **State Authorization** — Pertaining to regional accreditation, TCUs in the Higher Learning Commission's region are eligible to pursue and hold accreditation membership by nature of the recognition of their tribal sovereignty.



“Courage, wisdom, generosity, and industriousness are all teachings that the tribal elders have passed on to the tribal educators.”

If a TCU is federally authorized and/or supported, these institutions may have different reporting and approval requirements for such things as state authorization and distance learning.

Part 2:

FEDERAL LEGISLATION AND TRIBAL COMMITMENT — GOVERNANCE



THE RELATIONSHIP between the Tribal College and federal agencies is likely to be new to Commission peer reviewers. So, too, is the structure within the tribe and the relationship between the tribal government and the governing and administrative structures of the college.

Understanding the Context

- **Role of the Tribe and Its Charter** — There are 565 federally recognized Indian tribes in the United States. Each tribal nation has a unique political relationship with the federal government based on binding treaties signed by tribal leaders and U.S. government officials in the 1800s. In terms of self-governance, tribal nations are comparable to individual states and sovereign nations. Each tribal government is responsible for preserving and protecting the rights of its citizens and for maintaining the social and physical infrastructure necessary for their well-being.


Although tribal governments have the right to levy taxes, few do so because of the extreme poverty on their reservations. Most tribal governments provide police protection, social services, economic development, and educational services. If the tribe does not have the capacity to offer these services directly, the Bureau of Indian Affairs, which is ultimately responsible for the provision of these services through the federal government's treaty obligation, is required to provide them. In exercising their rights as sovereign governments, tribes that have the resources have established TCUs to provide their tribal members access to postsecondary education opportunities founded on tribal values, culture, and language.

- **Role of the Tribal Council** — Tribal Councils need to assure that chartering mechanisms minimize political interference. The councils have a right to require regular reports and audits, and they should definitely review accreditation reports. Tribal Councils also need to have processes in place so they do not become a sounding board for employee complaints, which is the responsibility of the college board of trustees via sound institutional policies.
- **Role of the College Board of Trustees** — The selection of the college trustees varies with each tribe. The Tribal Council members may seek applications and select the members, or they may opt to have an election process on the reservation held by each district or clan. The selection process is designated by the tribe at the time the college's charter is approved by the tribe. Many times the Tribal Council will require that a Council member be a voting or ad hoc member on the College Board. The charter may also require regular reporting from the college to the Tribal Council to keep the Council apprised of the college's successes and challenges. The College Board is responsible for ensuring that the Tribal Council's role is appropriate and that the board maintains the decision-making responsibility and authority for the college.

There is a delicate balance that must be maintained among the tribe, the politics within the community and on the reservation, the college and its board of trustees, and all other agencies. Indicators that this balance is being maintained successfully include: the college board retains its autonomy in the governance of the Tribal College; the board is responsible for policy, strategic planning and oversight; the board holds full responsibility for the oversight of the college, development of policy, and the selection of the chief executive of the college; board members are trained and made aware of the institution's unique circumstances and needs; the board has a clear set of operating policies and procedures to help guide it; there is effective decision-making that is based on individuals and groups functioning within their designated roles and areas of responsibility. In addition, the Tribal College board may have a statement of ethics based on expressed tribal values.

- **College Leadership** — One of the most critical, and many times the most challenging, responsibilities for a board is the selection of the college's president. Hiring preference to a member of their tribe or another Native American has been important to ensure an understanding of the unique role of the college in the community and the importance of the preservation and integration of their culture and traditions, history and language are integrated into the college's programs and curriculum (Archambault and Allen, 2002).

The relationships of boards to administration and the relationship of outside political entities such as the Tribal Councils, community members and organizations may have an impact on effective college leadership. In addition, inconsistencies may exist in the roles of the senior academic, fiscal, and student services areas and the college should have processes in place to address such inconsistencies. Evidence of processes to address these issues include a selection process for qualified personnel to ensure consistency and academic quality in college programming and services, as well as job descriptions, hiring practices, and transition planning adequate to support the institution's mission and unique characteristics.



"Hiring preference to a member of their tribe or another Native American has been important to ensure an understanding of the unique role of the college..."

Part 3:

FINANCIAL AND OTHER RESOURCES



FLEXIBILITY AND ADAPTABILITY are exceptional strengths of the Tribal Colleges and their tribes. They are challenged with the need to address a broad range of financial demands. Their tribal governments must juggle the myriad of monetary demands that go beyond the needs of the college. And, every tribe has a different portfolio of financial, physical and human resources to leverage. As a result, TCUs must be flexible and very adept at leveraging a wide range of resources to support their institution.

TCUs are funded very differently from most private or public higher education institutions. Understanding this support structure and determining its adequacy are essential for the peer reviewers. Securing reliable and consistent funding continues to lead the list of challenges for Tribal Colleges and Universities and continues to be their primary focus. Most of the Tribal Colleges are highly reliant on competitive and formula-based grant resources at the federal level and from private foundations. These resources help them survive and yet create a significant demand on human resources, including program administration and fiscal management. The award of a major grant is not an extra resource at TCUs but is part of the “bread and butter” of the institutions.

Understanding the Context

- **Federal Legislation** — In 1978, the U.S. Congress enacted the Tribally Controlled Community College Assistance Act (P.L. 95-471) (TCCUAA), legislation that would provide a base of operating funding for these institutions. The legislation currently authorizes funding at \$8,000 per American Indian student, but despite a clearly identified and justified need, Congress actually funds TCUs far below the authorized amount. In fiscal year 2011, TCU operating funds amounted to \$5,235 per full-time Indian student, with no funding for the non-Indian students that compose about 20% of all TCU students.

As a result of the lack of local or state support, Tribal Colleges rely heavily on federal funds for their core operational funding. In particular, their operating expenses rely on the funds distributed through TCCUAA and administered by the Bureau of Indian Education.

The Act authorizes funding through several sections:

- **Title I** currently allocates funding to 29 of the colleges through a formula based on the number of Indian students enrolled (called the Indian Student Count or ISC). No funds are distributed for non-Indian students, who make up a significant percentage of total enrollment at Title I schools on average. Title I is authorized at a per Indian student level of \$6,000, with a maximum total amount of \$40 million.

- **Additional TCUs with Separate Federal Funding** — There are three other TCUs funded under separate authorities within Interior Appropriations, namely Haskell Indian Nations University, Southwestern Indian Polytechnic Institute, and the Institute of American and Alaska Native Culture and Arts Development. The TCUs support their independent requests for funding of the institutional operating budgets. It should also be noted that since they are federally funded by the BIE they are also managed differently than tribally chartered colleges.
- **Enrollment Gains and New TCUs** — Compounding existing funding disparities is the fact that although the numbers of TCUs and students enrolled in them have dramatically increased since 1981, appropriations have increased at a disproportionately low rate. Since they were first funded, the number of Tribal Colleges has quadrupled and continues to grow; Indian student enrollments have risen by more than 370 percent. Between FY 2005 and FY 2012, five additional TCUs have become accredited and eligible for funding under Title I of the Tribal College Act. TCUs are in many ways victims of their own successes. The growing number of tribally chartered colleges and universities being established and increasing enrollments have forced TCUs to slice an already inadequate annual funding pie into even smaller pieces (AIHEC, 2012).
- **Title II** provides funding for core operations for Diné College.
- **Title III** provides matching funds for endowment grants, and is authorized at \$10 million. However, appropriations have never surpassed \$1 million.
- **Title IV** is authorized at \$2 million to finance local economic development projects, but funding has never been appropriated.
- In addition, funds are authorized for **Facilities Renovation and Technical Assistance**.

Note: Seeking and maintaining federal funding continues to challenge the institutions. Their staff and infrastructure are usually quite small and everyone wears several hats. The development of grant proposals is rarely that of an individual but the responsibility of many. It would be the exception if a TCU had a grants department or someone solely assigned to seek funding.

- **Bureau of Indian Education (BIE)** — As stated in Title 25 CFR Part 32.3, BIE’s mission is to provide quality education opportunities from early childhood through life in accordance with a tribe’s needs for cultural and economic well-being, in keeping with the wide diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities. Further, the BIE is to manifest consideration of the whole person by taking into account the spiritual, mental, physical, and cultural aspects of the individual within his or her family and tribal or village context. It provides services directly, or through contracts, grants or compacts, to 565

federally recognized tribes with a combined service population of approximately 1.9 million American Indians and Alaska Natives.

The BIE also serves American Indian and Alaska Native postsecondary students through higher education scholarships and support funding for Tribal Colleges and Universities. The BIE directly operates two postsecondary institutions: the Haskell Indian Nations University (HINU) in Lawrence, Kansas, and the Southwestern Indian Polytechnic Institute (SIPI) in Albuquerque, New Mexico.

AIHEC works with the BIE to sustain and increase funding for its member institutions funded under the Tribally Controlled Colleges and Universities Assistance Act of 1978 and other relevant legislation and to identify new sources of funding throughout the federal government to advance the collective mission of its member institutions.

Resource: <http://www.bie.edu>

- **Tribal Contributions** — Some tribal governments provide annual support to the TCUs. The amounts vary widely depending on the resources and wealth of the tribe. The tribes also contribute significant in-kind resources including legal, financial management, human resources management, and facilities management. These in-kind services help the colleges provide the necessary range of services and support on very limited budgets. The tribes also contribute support through shared facilities.
- **Community Contributions** — Some TCUs that are located in or near non-tribal communities may receive support from those communities. That may range from no support at all to provision of such resources as facilities, community library access, accommodations for research/ internships, and support in marketing. Support may depend upon the link between the tribe and the non-tribal community or the existence of other higher education institutions within the non-tribal community. The support is not expected, but certainly can contribute additional resources if available.
- **Land Grant Status** — The Tribal Colleges benefit from 1994 federal legislation Equity in Educational Land Grant Status Act (Pub. Law 103-382) awarding them land-grant status. They join 55 state universities and 17 Historically Black Colleges and Universities (HBCUs), which were designated as land-grant institutions in the 19th century. This new designation helps the Tribal Colleges become more visible and connected to mainstream institutions, by sharing projects, resources, and information with other land-grant colleges. With Land Grant Status, the Extension Services provided by TCUs are very important to the tribal community. The professional development and the research opportunities for students are valuable components of this status.

- **U.S. Department of Agriculture** — This department also awards rural development grants to colleges to strengthen aspects of the agricultural programs and make them “Centers of Excellence” in the nationwide rural development network. These resources assist the colleges in maintaining their commitment to their respect for the environment and sustainability.
- **Title III-A and V under the Higher Education Act** — In addition, some Tribal Colleges—like other minority-serving institutions—receive funding from Title III under the Higher Education Act, including the Aid for Institutional Development program, TRIO, and Pell Grants.
- **Perkins Career and Technical Education Programs** — include the **Tribally-Controlled Postsecondary Career and Technical Institutions**, the **Native American Career and Technical Education Program (NACTEP)**, and the **American Indian Adult and Basic Education (Office of Vocational and Adult Education)**. This funding is important for the development of technical courses, programs, and professional development.
- **White House Executive Order on Tribal Colleges and Universities (No. 13021)** — Given the Tribal Colleges’ chronic underfunding, the first White House Executive Order on Tribal Colleges and Universities (No. 13021) was signed in order to more fully integrate the colleges into federal programs. This document, issued by President Clinton on October 19, 1996, reaffirms the important role Tribal Colleges play in reservation development by directing all federal departments and agencies to increase their support to the colleges. The initiative was hoped to direct more attention toward the colleges, and bring in more resources and create greater opportunities (AIHEC, 1999). President Bush signed a second order on July 3, 2002 (No.13270), *“Improving American Indian and Alaska Native Educational Opportunities and Strengthening Tribal Colleges and Universities.”* On December 2, 2011, President Obama signed the third Executive Order (No. 13592), which, unlike the previous administrations, incorporates all levels of American Indian education into a single executive order.
- **Role of AIHEC** — The American Indian Higher Education Consortium (AIHEC) is the collective spirit and unifying voice of our nation’s Tribal Colleges and Universities (TCUs). AIHEC provides leadership and influences public policy on American Indian higher education issues through advocacy, research, and program initiatives; promotes and strengthens Indigenous languages, cultures, communities, and tribal nations; and through its unique position, serves member institutions and emerging TCUs.

AIHEC has grown to 37 Tribal Colleges and Universities (TCUs) with more than 75 sites in the United States and one in Canada. Each of these institutions was created and chartered by its own tribal government for a specific purpose: to provide higher education opportunities to American Indians through programs that are locally and culturally based, holistic, and supportive. TCUs have become increasingly important to educational opportunity for American Indian students and are unique institutions that combine personal attention with cultural relevance to encourage American Indians—especially those living on reservations—to overcome the barriers they face to higher education (AIHEC, 2012).

While TCUs and their students face many difficult challenges, it is important to note that they represent an important resource to each other. While not constituting one system, as with state-controlled university systems, collectively the TCUs compose the American Indian Higher Education Consortium (AIHEC). At the national policy level, AIHEC is similar to the American Association of Community Colleges (AACC); however, it differs in that it is a member-based organization, created, chartered, and governed directly by each of the accredited TCUs in the country. Through AIHEC, the TCUs are able to have a seat at the table in national policy and resource allocation discussions, and most important, they are able to share strategies and best practices in addressing the higher education needs of their students and the communities they serve (His Horse is Thunder, 2012).

- **Other notes:**

- The use of a wide range of grant funds is a much higher percentage of their total operating budget than is typically found in other higher education institutions. While this has been occurring for years, and is not desirable, the TCUs continue to work to become more self-sustaining.
- The majority of TCU funding is from variable sources, including money from tribes, federal allocation based on formula and grants from state and federal sources, and foundations. Most states do not contribute dollars for non-Native students. TCUs may achieve financial stability through 1) solid fiscal management that addresses all sources under one fiscal system, 2) strategic planning especially focused on college priorities, soliciting sources that address those priorities (not just because the dollars are available), and 3) sustainability plans to maintain existing priorities and new initiatives.
- The colleges are financially supported and monitored by federal agencies and private foundations and must meet their requirements. In addition, the TCUs must also meet the expectations of the tribal governments that charter them and help support them (Bowman, 2009).



"The majority of TCU funding is from variable sources."

Part 4:

COLLEGE CURRICULUM, PROGRAMS, AND SERVICES TO STUDENTS



TCUs PLAY A VITAL ROLE in the tribal community, creating educational opportunities, preserving culture and tradition, and providing valuable programs and services to the community. A college education is a path out of poverty. More American Indians live in poverty than any other racial or ethnic group, with 28% of American Indians below the poverty line on reservations and 22% impoverished nationwide (compared to a national poverty rate of 15.3%).

The American Indian population is the youngest in America, with 28% of American Indians under the age of 18. More than 60% of first-time entering Tribal College students are between 16-24 years old. College enrollment amongst American Indians is increasing as more see a college education as a way out of poverty. Full-time college enrollment amongst American Indians rose by 31.3% from 2003 to 2011.

Tribal College Journal editor Marjane Ambler noted that “...tribal colleges and universities understand the value of two worldviews; they serve students ... who seek respect for and a deeper knowledge of tribal traditions. They also serve students who know little about their tribes’ language, spiritual beliefs, scientific knowledge, or leadership traditions.” (Wheeler, 2004)

The American Indian spirit is so connected to the tribe and to the land that they could not survive any other way. As they face these issues together, they will also find strength together. Their greatest strength comes through education. In a tribal community, the knowledge of one quickly becomes the knowledge of many. On this scale, education becomes exponentially powerful. It can reverse generations of health and social problems. It can create jobs. It can revitalize a language. It is clear that even though students at TCUs pursue vastly different subjects, they unanimously shared the same hope for a better life, a better home and a better future for their tribe (American Indian College Fund, 2013).

Understanding the Context

- **Academic Programs** — TCUs are open admissions institutions and many students who come to the college are underprepared. As a result, the colleges invest significant energy to meet the needs of these students and develop programs focused on developmental education. TCUs also offer programs at the certificate, associate, baccalaureate, and graduate levels. Their programs include a wide range of academic programs and a general education core, along with key occupational programs in technology, education and business.

TCUs and AIHEC have worked collaboratively to develop current resources for faculty and academic leaders to develop programs that meet the needs and support services of their students and the needs of their communities. AIHEC’s new publication, “Breaking through Tribal

Colleges and Universities,” provides the tools and thought process for colleges to create the framework for appropriate programs and services at their colleges (His Horse is Thunder, 2012).

Particular areas of such attention include ensuring appropriate academic rigor, meeting general education requirements, having appropriate prerequisites, and having appropriate student assessment and learning outcomes in place. Related considerations might include the existence of strategic planning for program development and sustainability, along with assessment plans, faculty credentials, integration of technology, cultural components and service to the tribal communities.

Resource: <http://www.breakingthroughcc.org>

- **Faculty and Staff** — Because many TCUs are located in very remote areas of the country, they experience difficulty attracting well-qualified staff and faculty. Where there are gaps, the college should have a professional development plan that includes financial support and a timeline to help those individuals get their advanced degrees. There should be appropriate evaluation systems in place and conducted on a regular timeline. The college should also maintain appropriate files with current transcripts, resumes, and evaluations.

Resource: <http://ncahlc.org/Information-for-Institutions/assumed-practices>

- **Preservation of Language and Culture** — TCUs employ Tribal Elders, in addition to some Tribal “experts” in Tribal culture who are not yet considered to be “elders.” They may have expertise in such areas as tribal language or arts, but may not be designated as “elders.” In either case, the college should have an established minimum threshold of experience based on the tribe’s defined role of elders and some documentation reflecting those minimum experiences.

Elders often serve as faculty and resource people to the college and the curriculum. All TCUs have the preservation and revitalization of their traditions, language and culture as a core value and priority for their college. Elders, those individuals within the tribe who carry that designation and role, are often active as faculty in the integration of the culture and values into the curriculum and teach the language and culture classes.

- **Assessment** — TCUs are committed to assessment to improve student learning and demonstrate accountability to their communities and accreditation bodies. They are committed to a foundation of assessment that is grounded within the unique tribal cultures and traditions.

With the new emphasis on outcomes, Tribal Colleges have an opportunity to redefine their own measures of success and, therefore, their own curricular and pedagogical values and approaches in more culturally appropriate ways. By using their mission statements to set their own standards of measuring success, Tribal Colleges can view assessment programs as a means of pursuing their missions, building local capacity, and advancing processes of self-empowerment, self-determination, and decolonization among Native peoples (Karlberg, 2010). AIHEC commissioned a publication to be a resource to TCUs in the development of their learning

outcomes and appropriate measures, sensitive to their culture and traditions entitled, “Assessment Essentials for Tribal Colleges.”

Resource: <http://www.aihec.org>


- **AIHEC American Indian Measures for Success (AIMS).** This initiative is creating a national data base on Tribal Colleges as well as an effort to develop culturally relevant indicators of success for TCUs and their communities. Their data collection processes are comprehensive and are utilized to inform their unique constituents. TCUs understand the principles of data collection and analysis. The initiative is working to collect data on Tribal College enrollment, budgets, curricula, facilities, services, and student outcomes to inform the colleges, AIHEC, the College Fund, and the White House Initiative on Tribal Colleges and Universities.

Resource: http://www.aihec.org/programs/documents/AIMS_OverviewOct06.pdf

- **Institutional Research at TCUs** — Many TCUs encourage research by faculty, staff, students, and other affiliated investigators that is consistent with the mission of the College, their tribe and their community.

All research involving human subjects, for whom students, faculty, and staff are subjects or investigators, whether on campus or elsewhere, is subject to review by the college Institutional Review Board to assure that the research activities meet ethical and legal standards. The college IRB should be designated to assure that research conducted under its auspices does not individually or collectively harm members of the tribe through the misuse of cultural or other resources.

TCUs are expected to comply with the regulations of the U.S. Department of Health and Human Services for the protection of human subjects involved in research (Code of Federal Regulations Title 45 Part 46 as revised June 23, 2005). The definition of research used in this policy follows 45 CFR 46.102(d). Research is defined by the regulations as “a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge” [Federal Policy § .102(d)] (U.S. Department of Health and Human Services, 2013).



“This initiative is creating a national database as well as...culturally relevant indicators of success for TCUs and their communities.”

Part 5:

CULTURAL COMPETENCIES/AWARENESS AND VISIT LOGISTICS FOR HLC PEER REVIEWERS



IT IS IMPORTANT for peer reviewers to recognize and acknowledge that they are guests on the reservation. This section offers some guidance on the cultures, customs, and protocols that the team should observe while visiting the college.

Understanding the Context

- **Special Ceremonies and Cultural Customs** — Showing respect and appropriate protocol is important for the ceremonies that might be performed, prayers offered, and any special recognition of the team that are likely to be included in some aspect of the agenda for the visit. Food will be included and should be accepted. It is appropriate and expected that everyone at the meeting will be given an opportunity to speak if they choose. While the pace at meetings is slower than at a Western institution, it is important to respect the process.
- **Role of the Team Chair** — The HLC team chair is strongly encouraged to provide appropriate training and information to team members about the unique aspects of visiting a tribal college. Throughout the visit the chair should continue ongoing dialogue with team members about their unique experiences during the visit, and develop awareness of distinct aspects about the operations of the college and that may need further clarification or sensitivity to the college's culture and traditions.

The HLC team chair should be in contact with the TCU and ask about any cultural experiences or norms that the team should be aware of, including a blessing with sage and/or tobacco or other special ceremonies, or extending compliments about items that then could potentially lead the Native person to giving them the item of compliment. It is also appropriate to ask the college president about the proper protocol for any of the ceremonies so the college is comfortable that the team recognizes their importance.

- **Communication** — Communication in Native American culture is quite different than the usual American competitive-style communication. Their style values cooperation over competition, which is reflected in many areas of their lifestyles. When many Native Americans engage in conversation they listen intently, usually looking down and not establishing eye contact, until the person speaking is completely finished talking. Then the other person talks and fully expects to be able to completely finish their thought without interruption or before the conversation turns to another person (Standley, 2013).

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Higher Learning Commission

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Comments are welcome.

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