NWCCU Policies, Regulations, and Finances Review Report
Submitted to the Northwest Commission on Colleges and Universities

Little Big Horn College
Crow Agency, Montana
Aug 24, 2023
Table of contents

Introduction .................................................................................................................................... 5
Mission fulfillment ........................................................................................................................ 6
Standard 2. Governance, Resources, and Capacity................................................................. 7

2A. Governance................................................................................................................................. 7
   2.A.1 Board of Trustees ............................................................................................................... 7
   2.A.2 Leadership ....................................................................................................................... 8
   2.A.3 President ............................................................................................................................... 9
   2.A.4 College decision-making structures .............................................................................. 10

2B. Academic freedom .................................................................................................................. 12
   2.B.1 Academic freedom .......................................................................................................... 12
   2.B.2 Independent thought ....................................................................................................... 13

2C. Policies and procedures ........................................................................................................ 14
   2.C.1 Transfer-of-credit policy ................................................................................................. 14
   2.C.2 Student rights and responsibilities policies and procedures ........................................ 15
   2.C.3 Academic and administrative policies and procedures ............................................... 16
   2.C.4 Secure retention of student records policies and procedures ...................................... 17

2D. Institutional integrity ................................................................................................................ 18
   2.D.1 Accurate communications ............................................................................................... 18
   2.D.2 High ethical standards and complaints ......................................................................... 19
   2.D.3 Conflict of interest policies ............................................................................................ 21

2E. Financial resources ................................................................................................................ 22
   2.E.1 Audit process and financial stability .............................................................................. 22
   2.E.2 Financial planning .......................................................................................................... 24
   2.E.3 Transparent management of financial resources .......................................................... 25

2F. Human resources ................................................................................................................... 26
   2.F.1 Communication of employee conditions of employment ............................................... 26
   2.F.2 Employee opportunities for professional growth and development .............................. 27
   2.F.3 Sufficient employees ....................................................................................................... 28
   2.F.4 Employee evaluations ...................................................................................................... 29
2G. Student support resources
2.G.1 Effective learning environments and appropriate programs and services
2.G.2 Current and accurate information in catalog and website
2.G.3 Accurate communication on legal eligibility requirements for licensure
2.G.4 Financial aid
2.G.5 Financial assistance repayment obligations
2.G.6 Academic advising
2.G.7 Identity verification process for distance education students

2H. Library and information resources
2.H.1 Library

2I. Physical and technology infrastructure
2.I.1 Physical facilities and technology

Moving forward
Introduction

The Crow Tribal Council chartered Little Big Horn College (LBHC) on January 24, 1980. Resolution #80-17 authorized LBHC to operate as the official institution of postsecondary education for the Crow people, with amendments in 1993 and 2006. The charter expresses the purposes "of establishing, maintaining, and operating educational institutions at the postsecondary level on the Crow Indian Reservation, with education, vocational and technical programs and curricula leading to degrees and certificates that may be granted by the college."

LBHC is the Apsáalooke higher education and cultural center that grants associate of arts and associate of science degrees and certificates in areas that reflect the developing economic opportunities and social needs of the Crow Indian Reservation and surrounding communities, offering instruction by mainly in-person and limited distance education methods. The College is dedicated to the professional, vocational, and personal development of individual students for their advancement in higher education or entry into the workplace and inspiring Apsáalooke and American Indian scholarship. The College is committed to the preservation, perpetuation, and protection of Crow culture and language, and respects the distinct bilingual and bicultural aspects of the Crow Indian community. LBHC is committed to the advancement of the Crow Indian family and community building.

In 1994, LBHC became a federal Land Grant Institution, with the nation's tribal colleges and universities. The College is a public two-year community college, located in the town of Crow Agency ("Baaxawuaashe"), Montana, the capital of the Crow Nation. The tribal nation's executive, legislative, and judicial branches of government, the federal agencies of the Bureau of Indian Affairs of the US Department of the Interior, and the Indian Health Services of the US Department of Health and Human Services, are also located in Crow Agency.

LBHC serves the Crow Tribe of Indians, on the Crow Indian Reservation, a land base of 2.3 million acres (larger than Rhode Island and smaller than Connecticut). The tribal enrollment is over 14,000 members, among whom approximately 9,000 reside on or near the Crow Indian Reservation. Unemployment rates fluctuate between 22% and 45% with the seasons.

The courses of study offered are directly related to the job opportunities and economic development on the Crow Indian Reservation and surrounding communities. Associate of arts degrees are offered in areas such as Crow studies, education, human services, and business administration; associate of science degrees are offered in areas such as mathematics and science (e.g., community health, pre-nursing, pre-med, natural resources, environmental sciences, biology, and environmental health); and one year certificates are offered in areas such as highway construction and construction maintenance.

The majority of the 300 students enrolled per term are members of the Crow Tribe of Indians and there are 14 full-time faculty, 2 adjunct faculty, and 49 staff.

LBHC has no prior recommendations to address in the year 6 PRFR report and here is a link to the most recent financial statements and certified audit reports (year ending June 2021).
Mission fulfillment

The institution provides a one-page executive summary, which describes the institution’s framework for its ongoing accreditation efforts. This might include evidence of institutional effectiveness, core themes, or other appropriate mechanisms for measuring fulfillment of its mission.

LBHC’s mission statement is as follows: LBHC offers high quality degrees, certificates, and programs for professional, workforce, and personal development that bring prosperity and leadership to Crow Country and preserves, protects, and perpetuates the Apsáalooke language, history, and culture.

From 2010-23, LBHC used a scorecard for measuring mission fulfillment, which included the following four core themes: (1) access to educational training and opportunities, (2) commitment to community education and outreach, (3) dedication to the enhancement of the Crow culture and language, and (4) assuring student success (this core theme was added in 2018). Each core theme had corresponding objectives (23 in total), indicators of achievement, and intended outcomes, which, up until 2017, were measured and reported on annually in each fall for the previous academic year in a scorecard of college mission achievement (see the 2016-17 scorecard report). Just prior to and since the pandemic, this reporting cycle has been interrupted. The College plans on returning to reporting on the scorecard each fall.

In July 2023, LBHC updated its scorecard to focus on the two central goals of its mission: (1) Crow language, culture, and history and (2) student success. Under these two goals, this new scorecard includes more meaningful objectives. It has also integrated more qualitative objectives, including the general education and program learning outcomes assessment work (see the summary and detailed scorecard reports).

The acceptable threshold for mission fulfillment is that 75% of these targets are met or close to being met. For the purposes of improving the College, this scorecard will be shared with the campus community and is posted on the LBHC website. Currently, LBHC’s updated scorecard report includes up-to-date information on the progress of the four objectives (under the Crow language, culture, and history goal) and the general education learning outcomes assessment and program learning outcomes assessment objectives (under the student success goal).

1 On August 1, 2023, at an all employee orientation, all LBHC faculty and staff reviewed and provided feedback about the scorecard objectives.
Standard 2. Governance, Resources, and Capacity

The institution articulates its commitment to a structure of governance that is inclusive in its planning and decision-making. Through its planning, operational activities, and allocation of resources, the institution demonstrates a commitment to student learning and achievement in an environment respectful of meaningful discourse.

2A. Governance

2A.1 Board of Trustees

The institution demonstrates an effective governance structure, with a board(s) or other governing body(ies) composed predominantly of members with no contractual, employment relationship, or personal financial interest with the institution. Such members shall also possess clearly defined authority, roles, and responsibilities.

Evidence

a. Institutional governance policies and procedures: Board of Trustees manual

b. Board’s calendar for reviewing institutional and board policies and procedures: Board of Trustees manual (formulation and revision of board policy, pp. 3-4; periodic review of policy of professional code of ethics, p. 11; student fees establishment and publication, p. 16; periodic review of insurance policies, p. 17)

c. Bylaws and articles of incorporation referencing governance structure: LBHC’s by-laws and articles of incorporation

As of July 2023, the Board of Trustees consists of seven members who are selected in a nomination and appointment process and two non-voting representatives from different LBHC councils (i.e., faculty/staff and student councils). As of August 10, 2023, there will be 12 elected trustee members. The trustees represent six community districts of the Crow Reservation and each trustee is an enrolled Crow Tribal member. Trustees serve for staggered four-year terms. The Board meets quarterly, with special sessions scheduled as needed, and reviews policies at each meeting as needed (e.g., the procurement policy was reviewed in 2022), as well as during board retreats.

Board of Trustee members have no contractual, employment relationship or personal financial interest with LBHC. Trustee members possess clearly defined authority, roles, and responsibilities as outlined in the Board of Trustees manual (pp. 4-6) and, upon becoming a member, each trustee is required to review and sign three documents: a pledge and agreement, a conflict of interest policy, and a code of conduct.

The Board encourages the College’s constituencies to review and comment on proposed changes in existing policy. All new policies and policy revisions introduced at one meeting are voted on for action at the next scheduled meeting, so adequate time is provided for faculty, students, and staff to study the revisions and for interested parties to respond regarding the proposed policy or policy revision (Board of Trustees manual, formulation/revision of board policy, pp. 3-4).
2.A.2 Leadership

The institution has an effective system of leadership, staffed by qualified administrators, with appropriate levels of authority, responsibility, and accountability who are charged with planning, organizing, and managing the institution and assessing its achievements and effectiveness.

Evidence

a. Leadership organizational chart: LBHC organizational chart

b. Curriculum vitae of executive leadership: president (Dr. Yarlott’s CV), chief financial officer (Aldean Good Luck’s CV), chief information officer (Frank Cooper’s CV), dean of administration (Shaleen Old Coyote’s CV), dean of academics (Emerson Bull Chief’s CV), and dean of student services (Patricia Whiteman’s CV).


The college president is the only position for which the Board of Trustees has direct hiring responsibilities (Board of Trustees manual, p. 1, section D, item 6); therefore, the trustees have the responsibility of hiring a highly qualified president. One of the primary responsibilities of the president is to provide educational leadership for the College and the Board of Trustees in achieving goals and objectives (Board of Trustees manual, position description, pp. 6-8).

All employees hired at LBHC must provide proof of qualifications by submitting an official college transcript to ensure qualified personnel (employee policy and procedure manual, application requirements, pp. 39-40). This hiring process includes administrative positions. Position descriptions are officially filed in the human resources office to ensure proper documentation for the position. Department heads, deans, office chiefs, and the president are aware of their respective responsibilities and level of authority.

Employees receive position descriptions, attend an orientation, and review the LBHC employee policy and procedure manual, which details the institution's policies and procedures.

President’s council (including the dean of administration, dean of academics, dean of student services, chief financial officer, and chief information officer) receive assignments and are responsible for college planning, organizing, and managing (employee policy and procedure manual, descriptions of administrative staff, pp. 9-10). Currently, the 2018-23 strategic plan is being updated and the new plan will identify goals in the areas of academics; student success; technology; accreditation; marketing; personnel, facilities, and fundraising.
2.A.3 President

The institution employs an appropriately qualified chief executive officer with full-time responsibility to the institution. The chief executive may serve as an ex officio member of the governing board(s) but may not serve as its chair.

Evidence

a. Curriculum vitae of president/CEO: Dr. David Yarlott’s CV

The LBHC Board of Trustees hired David Yarlott, Jr, Ed D, in July 2002. Dr. Yarlott has a doctorate in higher education from Montana State University. His full-time responsibility is to LBHC. He sits on the Board of Trustees as an ex-officio member, does not vote in any decisions, and is not chair. Dr. Yarlott is a graduate of LBHC and holds an undergraduate degree from Montana State University-Bozeman. Initially, he was LBHC’s activities director, overseeing the men’s and women’s basketball teams. Following his undergraduate (business management) and master’s (business education) degrees, Dr. Yarlott joined the LBHC faculty and instructed business administration coursework. He advanced to department head, and then dean of academics.

Dr. Yarlott currently serves as the chair of the American Indian Higher Education Consortium, serves on the Montana Tribal Colleges Association, and is a commissioner for the NWCCU (for 5 years). He served for 18 years on the American Indian College Fund board. Dr. Yarlott has extensive and eminent training and experience in the forest fire industry and brings the College expertise in disaster management. Dr. Yarlott is an enrolled member of the Crow Tribe and speaks the Crow language fluently. See Dr. Yarlott’s CV for more details.
2.A.4 College decision-making structures

The institution’s decision-making structures and processes, which are documented and publicly available, must include provisions for the consideration of the views of faculty, staff, administrators, and students on matters in which each has a direct and reasonable interest.

Evidence

a. Institutional governance policies and procedures (see 2.A.1): catalog (student government, p. 29), Ram-tracker student handbook (student government/leadership/campus activities, p. 19), staff council by-laws, employee policy and procedure manual (councils, pp. 10-11), articles of the college charter, LBHC by-laws, faculty handbook (councils and committees, pp. 5-6)

LBHC has several decision-making councils, which include the views of students, faculty, and staff through a student government, a staff council, a faculty council, an academic council, and a president’s council. Each of these is elaborated upon below and all the evidence is publicly available on LBHC’s website.

The student government (catalog, p. 29; Ram-tracker student handbook, p. 19) is the governing organization of the student body at LBHC, including full- and part-time students. The officers are elected before the fourth week of the fall semester and members serve for one academic year. Five students are elected from the student body at large. The remainder of the student government comprises representatives from each of the charter clubs on campus. It is the responsibility of each chartered club to designate their student government representative. The student government selects their own officers (president, vice-president, and secretary); however, no member of the government has more rights or privileges than other members. The student government has several responsibilities: It allocates funds intended for activities and charter clubs’ use for the academic year; plans and organizes the activities available to students; and holds bi-weekly meetings, which are open to all students. Students wishing to be placed on the meeting agenda must inform the dean of student services, who acts as an advisor to student government, in writing at least one day prior to the meeting. Documents pertaining to the student government are held in the dean of student services office.

Jalen Cummins, the student government representative, traveled to Washington, DC, for the Legislative Summit (2020)
The **staff council** comprises all staff who are not faculty or administrators. The staff council’s purpose is to recognize, promote, and maintain the highest standards of service to LBHC. It also provides an active means of interaction and communication between administration, Board of Trustees, and staff. The staff council meets once a month, and the minutes are held with the secretary. The business and affairs of the staff council are managed by the elected officers. The officers may establish such policies it deems proper, consistent with the **staff council by-laws**, **employee policy and procedure manual** (staff council, p. 11), **articles of the college charter**, and **LBHC by-laws**. In addition to their collective responsibilities, officers assume areas of responsibility as determined by the officers (e.g., financial oversight, membership planning and monitoring).

The **faculty council** (faculty handbook, pp. 5-6) includes all LBHC instructors who teach at least three credit hours per semester. The faculty council’s purpose is to recognize, promote, and maintain the highest standards of instruction in higher education. It also provides an active means of interaction and communication between administration, the Board of Trustees, and the faculty. The faculty council is the formal body and voice of the faculty of LBHC; therefore, this body, recognized by the administration and Board of Trustees as a viable component of LBHC, presents appropriate and pertinent recommendations to the academic council, administration, and Board of Trustees. The voting members of the faculty council consist of faculty or adjunct faculty members whose primary responsibility is teaching. A quorum consists of 50% of the full-time faculty, plus one. Faculty council meetings are held monthly during the academic year to communicate and discuss issues of specific concern to the faculty. Faculty council members are expected to serve on college committees.

**Academic council** (faculty handbook, p. 5; **employee policy and procedure manual**, p. 10) members include the president, department heads, dean of academics, dean of student services, registrar, and student success center director. The council meets every month during the school term and the academic dean chairs this council. The academic council reviews and approves major decisions regarding new course proposals, advising program planning, semester schedules, grading system procedures and changes, graduation requirement review, and calendar planning and may send policy recommendations to the Board of Trustees. Also, catalog revision is a primary responsibility of this council. The academic council minutes are maintained in the dean of academic affairs office.

The **president’s council** (**employee policy and procedure manual**, p. 10; **faculty handbook**, p. 5) includes the president, dean of academics, dean of administration, dean of student services, the chief information officer, and the chief financial officer. Occasionally, other college personnel may participate on this council. The purpose of the council is to serve in an advisory capacity for college business operations and personnel matters (including contracts and academic regulations and policy). Specifically, the council reviews college business that impacts two or more departments. Moving forward, the minutes will be held in the human resources office.

Berthina Nomee, LBHC’s workforce navigator (2023)
2B. Academic freedom

2.B.1 Academic freedom

Within the context of its mission and values, the institution adheres to the principles of academic freedom and independence that protect its constituencies from inappropriate internal and external influences, pressures, and harassment.

Evidence

a. Academic freedom policies and procedures: faculty handbook (copyright law and academic freedom, academic responsibility, pp. 7-8), employee policy and procedure (U.S. copyright law 1978 and academic freedom, pp. 13-14), catalog (statement of academic freedom, p. 17)

b. Evidence that the students also have academic freedom: catalog (statement of academic freedom, p. 17), Ram-tracker student handbook (students’ rights, p. 7; student conduct code, p. 19; disruption of LBHC-sponsored activities, p. 21)

LBHC maintains an atmosphere for free academic expression for its faculty and students.

Instructors are entitled to freedom in research in the publication of results. Faculty are free to examine and test all knowledge appropriate to their discipline within the policies stated in the faculty handbook (pp. 7-8), employee policy and procedure manual (U.S. copyright law 1978 and academic freedom, pp. 13-14), and catalog (statement of academic freedom, p. 17).

LBHC provides each student the opportunity to learn. Personal freedoms and student rights are delineated in the catalog (statement of academic freedom, p. 17) and the Ram-tracker student handbook (students’ rights, p. 7; student conduct code, p. 19; disruption of LBHC-sponsored activities, p. 21). As it relates to academic freedom, students have the right to freedom of inquiry, speech, and assembly and the right to study and learn in an atmosphere of academic freedom.
2.B.2 Independent thought

Within the context of its mission and values, the institution defines and actively promotes an environment that supports independent thought in the pursuit and dissemination of knowledge. It affirms the freedom of faculty, staff, administrators, and students to share their scholarship and reasoned conclusions with others. While the institution and individuals within the institution may hold to a particular personal, social, or religious philosophy, its constituencies are intellectually free to test and examine all knowledge and theories, thought, reason, and perspectives of truth. Individuals within the institution allow others the freedom to do the same.

Additional evidence: employee policy and procedure manual (academic ethics and academic freedom, pp. 12-14), the faculty handbook (copyright law and academic freedom, academic responsibility, pp. 7-8), Ram-tracker student handbook (students rights, p. 7; students responsibilities, pp. 7-8; student conduct code, p. 19), catalog (statement of academic freedom, p. 17)

In the context of its mission, LBHC promotes independent thought and knowledge through developing degree programs that reflect the Crow Indian Reservation, in both economic opportunities and social needs. The College is dedicated to the advancement of higher education and inspiring Crow and American Indian scholarship. The standards of academic ethics (p. 12) and academic freedom (p. 13) are clearly articulated in the employee policies and procedures manual. The faculty handbook clearly lays out a set of academic ethics (p. 7) and ensures faculty can speak or write “free from institutional censorship or discipline” (p. 8). The faculty handbook (p. 7) specifies “the free pursuit of learning for the students”, “respect[ing] confidentiality and privacy in all matters”; “avoid[ing] the exploitation of students, Crow community, and Crow culture”; “behave[ing] professionally and courteously toward other staff, faculty, Board members, and affiliated agency members”; and “uphold[ing] high standards of conduct”.

The Ram-tracker student handbook outlines the rights and responsibilities of students (pp. 7-8) including “freedom of inquiry, speech, and assembly” and the “right to study and learn in an atmosphere of academic freedom”. Also, see standard 2.B.1.
2C. Policies and procedures

2.C.1 Transfer-of-credit policy

The institution's transfer-of-credit policy maintains the integrity of its programs and facilitates the efficient mobility of students desirous of the completion of their educational credits, credentials, or degrees in furtherance of their academic goals.

Evidence

a. Transfer of credit policies and procedures: LBHC website (transfer of college-level credits), catalog (transfer students, pp. 32-33)

LBHC has a policy for the transfer of credit. This policy is designed to permit students to transfer in the maximum course credits earned at other accredited institutions. LBHC accepts for transfer all college-level credits earned in undergraduate programs at institutions of higher education, which are regionally accredited or were regionally accredited when the student attended that institution. LBHC accepts for transfer all college-level credits earned in undergraduate programs at all tribal colleges that are accredited.

LBHC is participating in the state-wide program called the "transfer initiative" developed by the 59th Montana Legislature and commissioned by the Board of Regents and Montana University Systems. This initiative focuses on the transferability of college credits throughout the state with an emphasis of standardizing course numbering. The outcome and process are similar to a transfer agreement and serves the primary purposes of accepting courses when a student transfers to or from other Montana higher education institutions.

Upon the request of the applicant, the department in which a transfer applicant plans to declare a program of study will evaluate transcripts. The student will be informed as to which transfer courses can be accepted toward the program of study and which courses must be completed for the degree. When the student has completed 10 semester credits, the registrar will transfer all accepted credits to the student's official LBHC academic record.

Students transferring from LBHC to other Montana institutions under the "transfer initiative" are advised to meet with an advisor at the respective institution to review transcripts to develop a plan of study. Other considerations in transferring include the application process, formal acceptance, and financial aid applications or other requirements for attending.
2.C.2 Student rights and responsibilities policies and procedures

The institution’s policies and procedures related to student rights and responsibilities should include, but not be limited to, provisions related to academic honesty, conduct, appeals, grievances, and accommodations for persons with disabilities.

Evidence

Documentation of student’s rights and responsibilities policies and procedures, which include…

a. Academic honesty: catalog (academic dishonesty, p. 19; copyright and copying, p. 40); Ram-tracker student handbook (academic misconduct, including dishonesty, p. 20)

b. Conduct: Ram-tracker student handbook (code of student conduct, pp. 19-22)

c. Appeals, grievances: catalog (academic suspension and appeal of suspension, p. 22; federal aid appeal process, p. 33), Ram-tracker student handbook (students’ rights, p. 7)

d. Accommodations for persons with disabilities: catalog (disability support services, p. 26), Ram-tracker student handbook (pp. 13-14, disability support services)

LBHC’s policies and procedures related to student rights and responsibilities include provisions related to academic honesty, conduct, appeals, grievances, and accommodations for persons with disabilities (both physical and cognitive) are listed in its Ram-tracker student handbook (code of student conduct, pp. 19-22) and catalog (academic dishonesty, p. 19; copyright and copying, p. 40). Students have the right to petition for redress of academic and non-academic grievances (Ram-tracker student handbook, students’ rights, p. 7).

Valentine’s day push dance winners, students Johnilynn He Does It and Nadan White Clay (2023)
2.C.3 Academic and administrative policies and procedures

The institution’s academic and administrative policies and procedures should include admission and placement policies that guide the enrollment of students in courses and programs through an evaluation of prerequisite knowledge, skills, and abilities to ensure a reasonable probability of student success at a level commensurate with the institution’s expectations. Such policies should also include a policy regarding continuation in and termination from its educational programs, including its appeal and re-admission policy.

Evidence


b. Policies/procedures related to continuation and termination from educational programs including appeal process and readmission policies/procedures: catalog (academic probation, academic suspension, appeal of suspension, and reinstatement, p. 22)

LBHC has an open admissions policy. This means all persons who are graduates of accredited high schools or have received HiSET (GED) certificates are eligible for admission.

LBHC articulates its policies and procedures regarding admission and placement, and continuation in and termination from its educational programs, including its appeal and re-admission policy, in its Ram-tracker student handbook (placement testing, p. 14) and catalog (admissions, p. 13; placement testing, p. 14; academic probation, academic suspension, appeal of suspension, and reinstatement, p. 22; community outreach, p. 25).

Patricia Whiteman (dean of student affairs) participating in the Shoshone dance ceremony (June 2023)
2.C.4 Secure retention of student records policies and procedures

The institution’s policies and procedures regarding the secure retention of student records must include provisions related to confidentiality, release, and the reliable backup and retrievability of such records.

Evidence

a. Policies/procedures regarding secure retention of student records (i.e., back-up, confidentiality, release, protection from cybersecurity issues or other emergencies): catalog (academic records and privacy of records, p. 23), Ram-tracker student handbook (student records, p. 10), IT master policy (disaster recovery plan, p. 35); statement of student records and management and information release form (used by the registrar's office, per FERPA guidelines, when a parent or guardian wants access to student records); financial aid policies and procedures manual (authorization to furnish and release of information form, p. 26)

Admissions and registration maintain student records. Network file and database management is administered by the information systems technology department. On a routine schedule, student records are scanned and saved onto a secure file server (restricted user access). Nightly data backups to storage devices are run on these files. The campus management student records database Jenzabar EX is backed up hourly during regular business hours and, nightly, is securely backed up to devices over the network. Security and data loss prevention are maintained by having the file server, the database Jenzabar EX server, and data backup server located separately in secure network distribution facilities across campus. Periodic recovery tests are run on these backup devices to ensure their reliability.

The statement of student records and management and information release form is used by the registrar's office, per FERPA guidelines, when a parent or guardian wants access to student records.

The financial aid office stores hard copies of the students’ financial aid records (the student data forms that have student information) and the authorization to furnish and release of information form (financial aid policies and procedures manual, p. 26). Hardcopies of these records that have not been converted to scanned images are stored in a Halon fire-protected safe.

An assurance of confidentiality of student records is provided on p. 23 of the catalog (privacy of records). The College complies with the Federal Family Educational Rights and Privacy Act, noted in the catalog (p. 23) and the Ram-tracker student handbook (p. 10). Annually, the dean of student services provides FERPA training for the faculty and staff at the fall semester employee orientation meeting.

All LBHC student records are protected in locked fireproof filing cabinets in the admissions office, located in the student union building. The dean of students and registrar authorize and approve access to student records by specific admissions and registrar office staff members. Access is restricted to filing and specified student support services only.
2D. Institutional integrity

2.D.1 Accurate communications

The institution represents itself clearly, accurately, and consistently through its announcements, statements, and publications. It communicates its academic intentions, programs, and services to students and to the public and demonstrates that its academic programs can be completed in a timely fashion. It regularly reviews its publications to ensure accuracy and integrity in all representations about its mission, programs, and services.

Evidence

a. Policies/procedures for reviewing published materials that assures institutional integrity:
   - regarding updating the catalog (see the note at the top of the **catalog webpage**);
   - regarding the academic council’s responsibility for updating the catalog, see the **faculty handbook**, academic council, p. 5;
   - **IT procedures** (review and update of website content, p. 1)

Additional evidence: **catalog, LBHC website**

To ensure the highest level of accuracy as possible, faculty and staff update the catalog every two years for the following two years (see the note at the top of the **catalog webpage**). In addition, the contents of published catalogs are subject to being revised at any time. The LBHC catalog will be updated by the end of August 2023 for the 2023-24 and 2024-25 academic years. The **2021-23 catalog** reflected the 2021-23 academic program offerings (pp. 48-101). The catalog presents programs of study, plans of study, and degree requirements. The catalog lists the courses required, when they are offered, and prerequisites (if any). A program of study is mapped out for each student in the designated program, so they can see the sequence of courses they need to take to complete the program in a timely fashion.

The school calendar is published in the **catalog** (pp. 5-6) and on the **website**.

The academic council reviews and approves major decisions regarding new course proposals, advising program planning, semester schedules, grading system procedures and changes, graduation requirement review, and calendar planning and may send policy recommendations to the Board of Trustees. Catalog revision is a primary responsibility of the council (**faculty handbook**, p. 5)

Brochures published to promote LBHC programs and attract students to enroll in the College are designed to reflect the programs and services as published in the catalog. Often these brochures are used for recruiting students and marketing the College. Every effort is made to assure the information in the brochures is accurate and current (see the **brochure for the building maintenance program**).

LBHC has a history without many substantive program changes or eliminations. In the event one of these occurs, LBHC works individually with each student to develop a plan of study to allow them to complete the program they began. These plans of study are developed between the student and academic advisor, and then brought before the academic council to approve the new completion plan of study. The practice ensures the student will complete a degree they began in a reasonable timeframe.

Finally, the **Ram-tracker student handbook** is updated annually in June by the dean of student services.
2.D.2 High ethical standards and complaints

The institution advocates, subscribes to, and exemplifies high ethical standards in its management and operations, including in its dealings with the public, NWCCU, and external organizations, including the fair and equitable treatment of students, faculty, administrators, staff, and other stakeholders and constituencies. The institution ensures that complaints and grievances are addressed in a fair, equitable, and timely manner.

Evidence

a. Policies/procedures for reviewing internal and external complaints and grievances:

   Employee policy and procedure manual: responsibility to the public (p. 3), access to employee records (pp. 16-17), employee code of conduct (p. 20), chain of command (p. 21), complaint resolution procedures (pp. 61-63); overall ethical statement for the College and administration ethics (pp. 11-12)

   Ram-tracker student handbook: student misconduct procedures (p. 22)

Additional evidence

In addition to academic freedom and independent thought ethics discussed in standards 2.B.1 and 2.B2, LBHC has articulated an overall ethical statement for the College and administration ethics (employee policy and procedure manual, pp. 11-12).

Dealings with the public and external organizations: LBHC has clearly identified procedures articulated in its employee policy and procedure manual (p. 3) regarding its responsibility to the public. LBHC exists to serve the people of the College’s service area through education. Its success depends upon the relations the College, as represented by its employees, has with the public. The public includes students, parents, alumni, and others. Everyone shares in building and maintaining good relations with LBHC’s constituency. LBHC is judged not only by its graduates but also by the public’s personal contact with its employees through correspondence, telephone conversations, and visits on campus. The politeness and courtesies to the public on and off campus help maintain a positive image of the College.

Dealings with NWCCU: To ensure the contents of its reports to the NWCCU are accurate, as many faculty and staff as possible contribute to and review drafts of the reports.
The treatment of employees: The “complaint resolution procedures” are thoroughly outlined on pp. 61-63 of the employee policy and procedure manual and state, “The written complaint must contain sufficient detail to identify and clarify the basis for the complaint (unjustified action, unfair treatment, specific policy violation and the effects on the employee), the dates involved, and specify the corrective action desired by the employee and a brief summary of the results of the employee’s attempt to obtain satisfactory adjustment” (p. 62).

Grievances and complaints must be submitted to the employee’s immediate supervisor or the human resources office and they should be addressed within five business days of receipt. Once received, grievances and complaints are expected to be handled promptly and fairly, with notice given to the supervisor, dean, and president. All issues are heard in a scheduled meeting with superiors, resolving all issues involved and ensuring a fair outcome.

If the employee does not believe the grievance was handled appropriately or effectively, grievances are escalated following the chain of command. Therefore, all persons filing a grievance or complaint can expect fair and respectful treatment at LBHC.

The complaint resolution board reviews and recommends improvements to personnel practices at LBHC and serves as a grievance review board for LBHC employees. Members of the board include a representative from the finance department, the human resources officer, the faculty council president, a department or division supervisor, and one dean.

Student grievances (Ram-tracker student handbook, student misconduct procedures, p. 22): When a written complaint is filed, the student or organization named in the complaint is asked to appear before the student affairs committee, which includes the dean of student services, financial aid director, student success center director, and registrar. The student or organization involved has the opportunity to present their case to the student affairs committee. The evidence gathered is reviewed by the student affairs committee and a decision is made based on the findings of the investigation. If the complaint is academic, then the information will be forwarded to the dean of academics.
2. D. 3 Conflict of interest policies

The institution adheres to clearly defined policies that prohibit conflicts of interest on the part of members of the governing board(s), administration, faculty, and staff.

Evidence

a. Policies/procedures prohibiting conflict of interests among employees and board members:

   Employee policy and procedure manual: hiring of relatives (p. 47), secondary employment policy (p. 48), and conflict of interest and serving as a Board of Trustee member (p. 61), procedures for filing a grievance (p. 63)

   Board of Trustees manual: conflict of interest (pp. 21-22)

   Faculty handbook: conflict of interest with outside employment (p. 21)

The LBHC Board of Trustees manual (conflict of interest, pp. 21-22) states that administrators, faculty, and staff shall not take employment or consulting that conflicts with their college duties; an employee may not acquire an interest in any business or undertaking that may be directly and substantially affected to its economic benefit by official action to be taken by the College; and no college employee may engage in any activity, including lobbying, on behalf of an organization of which the employee is a member while performing the employee's job duties.

The LBHC employee policy and procedure manual (conflict of interest, p. 61) prohibits employees, staff, or faculty, from concurrently serving as an employee and trustee and filing for the Board of Trustees within three years of LBHC employment.

The faculty handbook (outside employment, p. 21) and employee policy and procedure manual (secondary employment, p. 48) state faculty members must report all outside employment to their respective department heads and deans to prevent any conflicts of interest.
2E. Financial resources

2.E.1 Audit process and financial stability
The institution utilizes relevant audit processes and regular reporting to demonstrate financial stability, including sufficient cash flow and reserves to achieve and fulfill its mission

Evidence

a. Policies/procedures that articulate the oversight and management of financial resources: financial policies and procedures (description of the budget cycle, p. 12; investment, endowment, and reserve funds, pp. 21-22)
b. Latest external financial audit including management letter: 2020-21 financial statements and auditor’s report (management letter, pp. 1-3; management’s discussion and analysis, pp. 5-13)
c. Cash flow balance sheets: financial statements and auditor’s report (p. 18)
d. Audited financial statements: financial statements and auditor’s report (pp. 15-23)
e. Tuition and fees, educational, and auxiliary revenue for undergraduate and graduate enrollments:
   Financial statements and auditor’s report: statement of revenues, p. 19; student groups and bookstore inventory, p. 39; cafeteria income, p. 40
   Financial aid policies and procedures manual: adequate checks and balances and separation of duties, p. 5; compliance audits and audited financial statements, p. 8
   LBHC does not have graduate enrollments.
f. Significant contracts/grants:
   Financial statements and auditor’s report: statement of activities for operating grants and contributions; pp. 16-17; restricted cash, p. 19; instruction, institutional support, other governmental funds (contracts and grants), pp. 18-19; due from other governments (grants), p. 36; advances from grantors; p. 38; schedule of expenditures of federal awards, pp. 41-42
   Financial policies and procedures: office of sponsored programs, pp. 23-24
g. Endowment and giving reports:
   Financial policies and procedures: investment, endowment, and reserve funds and bank accounts, pp. 21-23
   Financial statements and auditor’s report: balance sheet, investments, p. 18; investments notes, p. 28; endowment notes, p. 33; investments and endowments, p. 35
h. Investment revenue: financial statements and auditor’s report (revenue notes, pp. 33-35; interest income, p. 19; graph of revenue, pp. 9-10)
LBHC’s most recent financial statements and certified audit reports are for the year ending June 2021. The 2021-22 audit is in progress and the hope is to have it be completed by August 31, 2023. For the 2022-23 audit, the goal is to get back on track with the pre-pandemic schedule and have it be available by March 2024. LBHC has an independent certified public accountant audit all financial records. The Board of Trustees approves the appointment of a new independent auditor every three to five years. The professionally qualified personnel perform the annual external financial audit in accordance with generally accepted auditing standards in the United States. The College tries to complete each audit within nine months of the end of the College’s fiscal year. Upon completion, the College administration presents the appropriate and comprehensive institutional audit report to the Board of Trustees for review and approval.

The LBHC finance department has the responsibility to ensure there is sufficient cash flow to support its programs and services to the students, faculty, and staff. It accomplishes this by using relevant audit processes and regular reporting, as articulated in its financial policies and procedures, to demonstrate financial stability, including sufficient cash flow and reserves to achieve and fulfill its mission.

As of June 30, 2021, the College was in a stable financial position, increasing its net position from 2020 to 2021 by $3.2 million. Investments increased by approximately $994,000, and tuition and fees showed an increase of $180,000 for the year. Covid-related resources contributed to the overall net position increase.
2.E.2 Financial planning

Financial planning includes meaningful opportunities for participation by stakeholders and ensures appropriate available funds, realistic development of financial resources, and comprehensive risk management to ensure short term financial health and long-term financial stability and sustainability.

Evidence

a. Policies/procedures for planning and monitoring of operating and capital budgets, reserves, investments, fundraising, cash management, debt management, transfers and borrowing between funds: financial policies and procedures (budget, pp. 11-12); LBHC does not transfer or borrow between funds

b. Sample of meeting agendas, minutes, and/or other documentation as evidence of meaningful opportunities for participation by stakeholders: Board of Trustees minutes (quarterly finance report, p. 3)

At every quarterly Board of Trustees meeting, the chief finance officer presents a general update on the state of the College’s finances and budget (i.e., expenses and revenue). The board members have an opportunity to ask questions or request clarification. Annually in May or June, a draft of the budget is presented to the Board of Trustees for approval following the process outlined and illustrated in the financial policies and procedures (budget, pp. 11-12). The specific role of the Board of Trustees in the review and approval of the budget, audit, investment, and reserves appears in both the financial policies and procedures (budget, p. 11; audit, p. 13; investment and reserve funds, p. 21) and the Board of Trustees manual (budget and finances, p. 6; accounting system and investment of surplus funds and budget system, pp. 19-20). The finance department is currently reviewing its financial policies and procedures to ensure they reflect current college processes.

In order to ensure short-term financial health and long-term financial stability and sustainability, LBHC seeks and uses various sources of funds to ensure adequate support of its programs and services including federal appropriations received through the tribally controlled community colleges assistance act of 1978, tuition revenue, sponsored programs and grants, and development resources. Through its main source of funding, the College is mandated tribal college and university (TCU) funds for core educational and operating expenses.

LBHC’s planning process centers on realistic projections supported by enrollment projections and tuition. This deliberated and thoughtful planning process ensures LBHC operates within available resources each year. To avoid unforeseen risk, in 2011, LBHC set up a tribal college and university (TCU) reserve. As of April 30, 2023, the reserve was over $250,000.
2.E.3 Transparent management of financial resources

Financial resources are managed transparently in accordance with policies approved by the institution’s governing board(s), governance structure(s), and applicable state and federal laws.

Evidence

a. Description of internal financial controls: financial policies and procedures (e.g., purchase orders, p.15; check signing, p. 16; time and effort reporting, p. 19)

b. Board approved financial policies, state financial policies, or system financial policies: financial policies and procedures (approved by the Board of Trustees in 2015)

In 2015, LBHC created a set of financial policies and procedures, which was approved by the Board of Trustees and which the finance department follows carefully. Various processes – including purchase orders (p.15), check signing (p. 16), and time and effort reporting (p. 19) – are in place to avoid fraud.
2F. Human resources

2.F.1 Communication of employee conditions of employment

Faculty, staff, and administrators are apprised of their conditions of employment, work assignments, rights and responsibilities, and criteria and procedures for evaluation, retention, promotion, and termination.

Evidence

a. Human resource policies / procedures:
   Employee policy and procedure manual: administrative procedures, pp. 15-29; federal regulations, pp. 29-35; personnel administration, p. 39-49
   Faculty handbook: faculty responsibilities, p. 17-22; administrative procedures, p. 23-32

b. Policies/procedures related to teaching:
   Faculty handbook: academic freedom, academic responsibility, and curriculum (p. 8-11), faculty responsibilities (pp. 17-22)
   Employee policy and procedure manual: academic ethics, p. 12; employee code of conduct, p. 20; academic freedom, pp. 13-14

c. Policies/procedures for apprising employees of working conditions, rights and responsibilities, evaluation, retention, promotion, and termination:
   Employee policy and procedure manual: work conditions, pp. 8-65; employee rights, p. 29; sexual harassment, pp. 31-33; personnel evaluation, pp. 46-47 (also see the employee 90 working day review form and the staff annual evaluation form); promotions, p. 45; disciplinary process, pp. 56-58; termination and appeal process, pp. 58-60
   Faculty handbook: faculty evaluation, pp. 18-19
   Employee orientation list
   Work assignment duty stations

All new employees attend orientation at the human resources office (see the employee orientation list). During orientation, the employee reviews the employee policy and procedure manual, which has information about rights and responsibilities (p. 29), disciplinary process (pp. 56-58), evaluation processes (pp. 46-47), and termination and appeal procedures (pp. 58-60). Also, the employee receives details about their conditions of employment, work assignment duty stations, and job description. In addition, employees sign forms acknowledging the receipt of information, responsibilities, confidentiality, job descriptions, and the College's expectations. Signed paperwork and copies of job descriptions remain in the employee personnel file.

LBHC promotes employee retention by addressing employees' financial, educational, cultural, and social needs. Employees receive pay increases after a 90-day evaluation, every other year, and after completing a higher degree. Employees are provided information on leave and available benefits and the steps to appeal following a termination procedure (termination policy and appeal process policy, pp. 58-60).
2.F.2 Employee opportunities for professional growth and development

The institution provides faculty, staff, and administrators with appropriate opportunities and support for professional growth and development.

Evidence

a. Employee professional development policies/procedures:

Employee policy and procedure manual: educational leave, p. 27; tuition opportunities, p. 54; and professional development, pp. 55-56

Faculty handbook: professional development, pp. 19-20

Professional development agreement for employees

Employees receive information on professional development programs, accommodating personal needs when possible, and LBHC-hosted cultural events. Professional development opportunities are outlined in the employee policy and procedure manual (educational leave, p. 27; tuition opportunities, p. 54, professional development, pp. 55-56) and the faculty handbook (professional development, pp. 19-20). Also, faculty and staff are encouraged to attend area-specific trainings. Faculty are encouraged to engage in a variety of professional development activities to improve their knowledge base and skills within their discipline, increasing effectiveness and broadening their understanding of the world.

LBHC has a professional development agreement for employees where the College offers employees to obtain an advanced degree with a payback plan of two semesters of employment for every one semester of funds used.

Staff retreat at Black Canyon youth camp (2021)
2.F.3 Sufficient employees

Consistent with its mission, programs, and services, the institution employs faculty, staff, and administrators sufficient in role, number, and qualifications to achieve its organizational responsibilities, educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs.

Evidence

a. Documentation about engagement and responsibilities specified for faculty and staff, as appropriate: employee policy and procedure manual, faculty handbook

b. Personnel hiring policy/procedures:
   Employee policy and procedure manual: personnel administration, pp. 39-50; hiring of relatives, p. 47
   Faculty handbook: faculty/adjunct criteria, recruitment and appointment for faculty, etc., pp. 23-32

c. Academic organizational chart: LBHC organizational chart

d. Administrator/staff/faculty evaluation policies/procedures: Also, see 2.F.4
   Employee policy and procedure manual: personnel evaluation, pp. 46-47 (also see the employee 90 working day review form and the staff annual evaluation form)
   Faculty handbook: faculty evaluation, pp. 18-20
   Student evaluation of teaching form

LBHC ensures sufficient faculty, staff, and administrators' employment by monitoring and identifying the College's needs, students' needs, program changes, and resignations or terminations. Then, in conjunction with the human resource office, the dean of academics or the president will determine the needs of the faculty or staff position and proceed with recruitment based on respective policy and procedures in the faculty handbook (faculty/adjunct criteria, recruitment and appointment of faculty, and recruitment of adjunct and part-time faculty, pp. 23-25) and in the employee policy and procedure manual (personnel administration, p. 39). In addition, by advertising locally and regionally, the College recruits the best, most highly qualified instructors for available teaching positions.

14 full-time faculty, 2 adjunct faculty, and 49 staff.
The faculty comprise 14 qualified full-time and 2 qualified adjunct instructors. Of the faculty members, two hold doctorate degrees, one has a doctorate in progress, six have master’s degrees, and nine hold bachelor’s degrees accompanied by professional expertise and extensive professional experience. The senior faculty members each have 24+ years of instruction experience at LBHC.

In order to ensure the integrity and continuity of its academic programs, regular meetings of the president's council, academic council, faculty council, and staff councils provide the necessary oversight of the institution's needs (employee policy and procedure manual, councils, pp. 10-11; faculty handbook, councils and committees, pp. 5-6). By maintaining and recruiting qualified staff and faculty and continuing to review academic policies, the institution can achieve its goals of (1) preserving Crow culture, language, and history and (2) student success.
2.F.4 Employee evaluations

Faculty, staff, and administrators are evaluated regularly and systematically in alignment with institutional mission and goals, educational objectives, and policies and procedures. Evaluations are based on written criteria that are published, easily accessible, and clearly communicated. Evaluations are applied equitably, fairly, and consistently in relation to responsibilities and duties. Personnel are assessed for effectiveness and are provided feedback and encouragement for improvement.

Evidence

a. Administrator/staff/faculty evaluation policies/procedures:
   
   - Employee policy and procedure manual: personnel evaluation, pp. 46-47 (also see the employee 90 working day review form and the staff annual evaluation form)
   - Faculty handbook: faculty evaluation, pp. 18-20
   - Student evaluation of teaching form

   LBHC uses performance evaluation processes to ensure faculty, staff, and administrators meet the institution's mission, goals, objectives, policies, and procedures (evaluations are due every April). Evaluation forms include set performance factors (written criteria) based on the standards and expectations set by items in the employee policy and procedure manual (the overall ethical statement, p.11; administration ethics, pp. 11-12; academic ethics, pp. 12-13; employee code of conduct, p. 20) and in the employee 90 working day review form and the staff annual evaluation form. In addition, employees discuss the assessments, improvement plans, additional training, and advancement plans with their supervisors (employee policy and procedure manual p. 44 section 7.4 performance evaluation, pp. 46-47), and the human resources office maintains evaluation forms in employee personnel files. Areas in which additional training would be helpful or should be required are designated. Supervisors maintain fairness in conducting employee evaluations according to policy guidelines (pp. 11-12, administration ethics).

   Staff: All new employees undergo a probationary 90 day period (employee policy and procedure manual, probationary period, p. 44). Upon completion of the probation period, an evaluation (employee 90 working day review form) is completed and reviewed to determine if the employee is to continue permanently in the position and what pay increase is appropriate. After this, staff employees receive annual performance evaluations (staff annual evaluation form; employee policy and procedure manual, personnel evaluation, pp. 46-47).

   Faculty: All new faculty undergo a probationary period of one semester (faculty handbook, faculty probationary period, p. 27). Upon completion of the probation period, an evaluation (employee 90 working day review form) is completed and reviewed to determine if the faculty is to continue permanently in the position and what pay increase is appropriate. After this, students evaluate courses and instructors every semester (student evaluations) and it is the responsibility of the department head and/or dean of academics to evaluate their faculty at least once every three years (faculty handbook, faculty evaluation, pp. 18-19).
2G. Student support resources

2.G.1 Effective learning environments and appropriate programs and services

Consistent with the nature of its educational programs and methods of delivery, and with a particular focus on equity and closure of equity gaps in achievement, the institution creates and maintains effective learning environments with appropriate programs and services to support student learning and success.

Evidence

a. Listing of programs and services supporting student learning needs: Ram-tracker student handbook (academic advising, bookstore, cafeteria, counseling and student development, day care services, disability support services, tutoring, student success center, etc., pp. 13-16)

In addition to faculty support in and outside of the classroom, the student success center provides career services (including transfer assistance and career internships); services for students with disabilities; tutoring and mentorship; computer access; assistance with scholarship applications; and advising.

The library offers beautiful study spaces, computers, and assistance with course research and the Title III office has tutors.

The health and wellness center offers students, faculty, staff, and surrounding community members a chance to develop a healthier lifestyle, which supports academic success and well-being. The facility includes a cardio room, weight room, aerobic room, two saunas, a gymnasium, and a concession where students and the public can learn to prepare healthy meals.

LBHC student organizations include the Indian club, American Indian Higher Education Consortium (AIHEC), and American Indigenous Business Leaders (AIBL).
2.G.2 Current and accurate information in catalog and website

The institution publishes in a catalog, or provides in a manner available to students and other stakeholders, current and accurate information that includes: institutional mission; admission requirements and procedures; grading policy; information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion based on normal student progress and the frequency of course offerings; names, titles, degrees held, and conferring institutions for administrators and full-time faculty; rules and regulations for conduct, rights, and responsibilities; tuition, fees, and other program costs; refund policies and procedures for students who withdraw from enrollment; opportunities and requirements for financial aid; and the academic calendar.

Evidence

Catalog (and/or other publications) that provides information regarding:

a. Institutional mission: catalog (p. 3), LBHC website
b. Admission requirements and procedures: catalog (p. 13), LBHC website
c. Grading policy: catalog (pp. 20-21)
d. Information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion: catalog (pp. 24, 49-120)
e. Names, titles, degrees held, and conferring institutions for administrators and full-time faculty: catalog (pp. 121-126)
f. Rules and regulations for conduct, rights, and responsibilities: Ram-tracker student handbook (code of conduct, pp. 7-8), catalog (academic freedom and non-discrimination, p. 17)
g. Tuition, fees, and other program costs: catalog (pp. 4 and 34), website
h. Refund policies and procedures for students who withdraw from enrollment: catalog (calendar, pp. 5-6; tuition refund policy and schedule, p. 16); financial aid policies and procedures manual (title V refunds, p. 8); website (tuition refund policy, return of federal student aid, title IV funds)
i. Opportunities and requirements for financial aid: catalog (pp. 31-33), financial aid webpage
j. The academic calendar: catalog (pp. 5-6); website

The information listed above is published in the catalog and/or the LBHC website. Faculty and staff update the catalog every two years for the following two years. In addition, the contents of published catalogs are subject to being revised at any time. The LBHC catalog will be updated by the end of August 2023 for the 2023-24 and 2024-25 academic years. See 2.D.1 for more information about the catalog.
2.G.3 Accurate communication on legal eligibility requirements for licensure

Publications and other written materials that describe educational programs include accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered. Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials.

Evidence

Samples of publications and other written materials that describe:

a. Accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered:

AA degree in human services (addictions studies option): catalog, pp. 67-68 (graduates will complete all education and experience requirements necessary to apply for testing for the addiction counseling certification with the State of Montana)

AA degree in education (elementary education option): catalog, pp. 59-60

AA degree in education (early childhood education option): catalog, pp. 61-62

Early childhood education certificate, catalog, p. 98 (“Demonstrate their ability to successfully complete the process for CDA and licensure for operating a daycare according to the National Council of Professional Recognition, NAEYC and Head Start.”)

Building maintenance certificate: catalog, p. 101, brochure

Highway construction certificate: catalog, p. 100 (“Be well prepared to pass the necessary state licensure exams in order to attain a class “A” commercial driver’s license – as well as other classes of commercial vehicle operations licenses”), brochure

b. Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials:

See items in “a” above.

There are two degrees – (1) human services associate degree (addictions studies option) and (2) education (elementary education option and early childhood education option) – and three one-year certificates – (1) early childhood education, (2) building maintenance, and (3) highway construction – that require some sort of licensure during or after earning an LBHC degree or certificate. Faculty are including in the 2023-25 catalog more detailed licensure information to be more aligned with this standard.

AA degree in human services (addictions studies option): catalog, pp. 67-68

The associate of arts degree in human services (addictions studies option) prepares students with the professional, legal, ethical, and cultural aspects of human services counseling with a specific emphasis on addictions counseling. Students graduating with the associates of arts in human services (addictions studies option) will be ready to continue their education at a four-year institution or enter the workforce and begin the licensed addiction counseling candidate application with the Montana Department of Labor & Industry: Board of Behavioral Health [MCA 37-35-202].
The **AA degree in education, elementary education option** *(catalog, pp. 59-60)*, is designed to ensure students acquire the requisite knowledge and skills for obtaining employment as a paraprofessional educator and/or transfer to a four-year institution to obtain a bachelor’s degree in elementary education and/or special education. When students have completed their course work, they can take a state licensure exam called the “class 7 for Crow language and culture teachers”, which allows them to teach in the classrooms. Option 2 is an AA degree in education that allows them to teach as a paraprofessional in the classroom, which meets the required competency by the schools. Option 3 is due to teacher shortages, students that have teaching experience and an AA education degree can qualify for class 2 licensure under emergency or provisional license.

The **AA degree in education, early childhood education option** *(catalog, pp. 61-62)*, is primarily designed to prepare students to obtain the requisite knowledge and skills for obtaining employment or advancement to a four year institution for a degree in early childhood education and/or special education. The one-year early childhood education certificate (i.e., the first year of the associate degree) is for students who are interested in immediate job preparation and placement in an entry-level early childhood setting. It is designed to meet minimal requirements for the CDA licensure *(catalog, p. 98)*; therefore, when students complete their course work, they meet the requirements for the national Administration on Children, Youth and Families (ACYF) Childhood Development Associate (CDA) requirements for the workplace.

**Building maintenance (1 year certificate)**

The one year certificate in building maintenance *(catalog, pp.101-104; brochure)* prepares students in building maintenance, carpentry, plumbing, HVAC, electrical, and home improvement and repair. LBHC has an agreement with Montana State University – Northern to teach the electrical and plumbing course. If students opt for the carpentry apprenticeship, they need to complete a certain number of apprenticeship hours (4,000) in the workplace, and then they can apply for a journeyman license.
Highway construction (1 year certificate)

The one-year certificate in highway construction is designed to help prepare students for successful employment in the construction industry. The truck driving program follows the industry-wide standards and curriculum. The heavy equipment program is designed to provide students with an overview of the industry, laws, regulations, qualifications, preventative maintenance, controls, and basic experiences/skills in the operation of heavy equipment. During the program, students take the necessary state licensure exams in order to attain a class “A” commercial driver’s license (catalog, p. 100). They can later obtain other classes of commercial vehicle operations licenses. For the heavy equipment portion, students can receive stackable credentials for specific heavy equipment through National Center for Construction Education & Research (NCCER) that allow students to obtain entry-level employment.

Highway construction students in action!
2.G.4 Financial aid

The institution provides an effective and accountable program of financial aid consistent with its mission, student needs, and institutional resources. Information regarding the categories of financial assistance (such as scholarships, grants, and loans) is published and made available to prospective and enrolled students.

Evidence

a. Published financial aid policies/procedures including information about categories of financial assistance: financial aid policies and procedures manual (pp. 10-12), catalog (pp. 31-33), Ram-tracker student handbook (pp. 10-11), financial aid webpage

b. Information to students regarding repayment obligations: NA. LBHC does not participate in any student loan programs.

c. Policies / procedures for monitoring student loan programs: NA. LBHC does not participate in any student loan program.

LBHC offers various forms of financial aid grants and scholarships and work study opportunities including the federal work study program, federal supplemental education opportunity grant, federal Pell grant, American Indian College Fund, tribal funding, and veteran benefits. The financial aid policies and procedures manual clearly articulates administrative capability and office organization (section 1), institutional eligibility (section 2), general provisions (section 3), federal Perkins loan program (section 4), federal work study programs and job locations and development programs (section 5), federal supplemental educational opportunity grant program (section 6), federal Pell program (section 7), native and tribal funds (section 8), procedures and calendars (section 9), and includes various appendices. In addition, information regarding the categories of financial assistance is published and made available to prospective and enrolled students in the catalog (pp. 31-33), Ram-tracker student handbook (pp. 10-11), and financial aid webpage.
**2.G.5 Financial assistance repayment obligations**

Students receiving financial assistance are informed of any repayment obligations. The institution regularly monitors its student loan programs and publicizes the institution's loan default rate on its website.

**Evidence**

a. Published financial aid policies/procedures including information about categories of financial assistance: financial aid policies and procedures manual (pp. 10-12), catalog (pp. 31-33), Ram-tracker student handbook (pp. 10-11), financial aid webpage

b. Information to students regarding repayment obligations: NA. LBHC does not participate in any student loan program (catalog, p. 31).

c. Policies/procedures for monitoring student loan programs: NA. LBHC does not participate in any student loan program (catalog, p. 31).

d. Loan default rate published on website: NA. LBHC does not participate in any student loan program (catalog, p. 31).
2.G.6 Academic advising

The institution designs, maintains, and evaluates a systematic and effective program of academic advisement to support student development and success. Personnel responsible for advising students are knowledgeable of the curriculum, program and graduation requirements, and are adequately prepared to successfully fulfill their responsibilities. Advising requirements and responsibilities of advisors are defined, published, and made available to students.

Evidence

a. Description of advising program, staffing, and advising publications: Ram-tracker student handbook (academic advising and counseling and student development, p. 13); catalog (student services, pp. 25-26; advising, p. 45-49); faculty handbook (student advising, p. 10-11)

b. Systematic evaluation of advising: see narrative below.

c. Professional development policies / procedures for advisors: faculty handbook (professional development, pp. 19-20); employee policy and procedure manual, educational leave (p. 27) and professional development (pp. 55-56); professional development agreement for employees

Academic advising is important to student success. The student success center offers to first year students and transfer students placement testing and advising and staff are available to assist students when faculty are not.

Each second-year student is assigned an academic advisor (a faculty member) based on the student’s declared major. Students are required to contact their advisor each semester to learn about academic requirements, plan their schedule, and discuss their educational plans (catalog, checklists for students, p. 45). The advisor’s signature is required before a student’s registration card is submitted to ensure proper course selection. Advisors use a plan of study (catalog, p. 48) and a record of discussion (catalog, pp. 46-47) to keep track of student progress and file these documents for future reference.

Although there is no official evaluation of the advising process, the faculty advisors consult with one another about how to advise students. Faculty would like students to know faculty are available for advising during the summer and on an ongoing basis. This summer or fall, academic council, faculty, and the student success coordinator plan to reflect together on how to improve advising.
2.G.7 Identity verification process for distance education students

The institution maintains an effective identity verification process for students enrolled in distance education courses and programs to establish that the student enrolled in such a course or program is the same person whose achievements are evaluated and credentialed. The institution ensures that the identity verification process for distance education students protects student privacy and that students are informed, in writing at the time of enrollment, of current and projected charges associated with the identity verification process.

Note: Institutions should refer to NWCCU Distance Education Policy for guidance and definitions related to the required evidence.

Evidence

a. Policies/procedures for ensuring the student who registers in a distance education course/program is the same student who participates in the course and receives credit: catalog (admission requirements, p. 13); hybrid instruction application form; also see the narrative below

b. Policies/procedures make it clear that these processes protect student privacy: Ram-tracker student handbook (student code of conduct [including academic dishonesty], pp. 19-20; rights and responsibilities of students, pp. 7-8; academic records [privacy], p. 10) and catalog (academic dishonesty, p. 19; copyright and copying [and plagiarism], p. 40); also see the narrative below

c. Notification to students at the time of registration of any additional charges associated with verification procedures: LBHC does not charge additional fees for verification procedures (see the last page of LBHC’s substantive change submission for making programs available via distance education)

d. Academic policies/procedures for instructors to implement requirements for regular and substantive interaction in distance education courses/programs – The faculty are in the process of adding a policy regarding regular and substantive interaction in distance education courses/programs into the faculty handbook (see the draft policy).

Although, during the pandemic, courses were offered all online, in fall 2023, it is expected that only approximately 7 classes will be solely online. It is important to note that in the rural Crow reservation, due to family structure, clan, other society relationships, and daily interactions, members of the Crow reservation community typically know one another and can identify one another.

For all student applicants the application can be completed in person or online on Cloudram (LBHC’s student portal). The admissions office processes the application and requests a significant amount of required documentation (catalog, p. 13) including the application, declaration of major, zero tolerance form, certificate of Indian blood or tribal photo ID, official high school transcript or HiSet certificate, social security card, and Accuplacer test. The identity verification procedures in the admissions office verifies LBHC is enrolling a real person.

After the student completes their application, the admissions office provides them with a web access code (user ID and password) to access Cloudram. Then, students can meet with an advisor and register for classes. Once a student is registered, IT assigns the student a college email
address. The same process is used for registering students taking classes solely online. Google classrooms can only be accessed through an LBHC student email address.

All college communication and interaction between the student and the College – including accessing distance education learning portals is protected, accessible only by secure username and password. Students are advised not to share this information with anyone, and students are required to use their LBHC email address for all communications with faculty and staff. This authentication process protects the privacy and security of student information.

Students enrolled in distance education courses at LBHC are expected to abide by all applicable institutional policies, including those related to academic honor, student integrity, and plagiarism, which are listed in the catalog (academic dishonesty, p. 19; copyright and copying [and plagiarism], p. 40) and Ram-tracker student handbook (student code of conduct [including academic dishonesty], pp. 19-20; rights and responsibilities of students, pp. 7-8; academic records [privacy], p. 10).

LBHC does not charge additional fees for verification procedures (see the last page of LBHC’s substantive change submission for making programs available via distance education).

LBHC protects student privacy with policies in the catalog (academic records and privacy of records, p. 23) and Ram-tracker student handbook (academic records and privacy, p. 10). Also, college employees attend at least annual FERPA training and follow FERPA guidelines.

The faculty handbook was updated in June and is being updated again to include a section on the requirement of regular and substantive interaction (see the draft policy). Also, the College plans to add procedures regarding this standard to the catalog, hybrid instruction application form, and Ram-tracker student handbook.
2H. Library and information resources

2.H.1 Library
Consistent with its mission, the institution employs qualified personnel and provides access to library and information resources with a level of currency, depth, and breadth sufficient to support and sustain the institution's mission, programs, and services.

Evidence

a. Procedures for assessing adequacy of library collections: LBHC library collection development policy (general selection criteria, p. 3; collection maintenance including weeding, preservation, and changes in collection focus, p. 6)

b. Library planning committee and procedures for planning and collection development: The library, archives, and cultural center / museum committee meets on an as-needed basis and follows the LBHC library collection development policy (responsibility for selection and general selection criteria, p. 2-3; format-specific selection criteria, p. 4; subject-specific selection criteria, p. 5)

c. Library instruction plan; policies/procedures related to the use of library and information resources: circulation and use of electronic resources policy (includes confidentiality of records, ID requirements, borrowing privileges, loan periods and user types; renewals, recalls, and holds; replacement charges; electronic library resource use guidelines)

d. Library staffing information: The library staff includes a director, an assistant librarian, a technical library assistant, and two library aids.

Policies and procedures that explain the faculty and library partnership for assuring the library and information resources are integrated into the learning process: The faculty and library recently created a faculty-library partnership agreement for assuring library and information resources are integrated into the learning process since more of the library’s resources could be used by students and faculty, as noted in the assessment of faculty/course use of library resources (winter 2020).

The LBHC library serves the needs of the College as well as the needs of the Crow and wider communities. In line with the College’s mission of preservation and perpetuation of Crow culture, the library is strong in its collection of...
Crow and Native American studies resources, especially in print. The library selects its resources based on the curriculum and tries to support the needs of all academic fields. Inter-library loans are also available.

Current, in-depth, and broad materials are accessible online (see the databases tab) – including in EBSCO, GALE, and Proquest databases and in subject-specific databases. There is also currency, depth, and breadth in the print collection. The library provides students, faculty and the public access to 17,000 print volumes, nearly 15,000 periodical titles both print and electronic, e book access, general internet access (including wifi). Resource areas of particular strength are Crow and Native American Studies, early childhood education, natural resources, nursing and health and the history of the American west. There is also a collection of approximately 4,000 audiovisual materials, much of which is video recordings related to the Crow people and LBHC.

Library staff prepare customized information literacy sessions for instructors and their classes and support faculty and students with research assignments as part of their library and information training/literacy sessions and other needs. The library keeps hard copies of textbooks on file at the library. The library is open for extra hours during midterm and finals week to allow more flexibility for students to study. Library learning outcomes are articulated in the catalog (p. 49) and reinforced in ED 100, a skills for success course that includes foundational library skills. Further and more in-depth information fluency skills are developed in various other classes.

The library employs qualified personnel, both in academic degrees and in years of experience, including a director, an assistant librarian, a technical library assistant, and two library aides, who can provide appropriate services and resources to students and the wider community.
2I. Physical and technology infrastructure

2I.1 Physical facilities and technology

Consistent with its mission, the institution creates and maintains physical facilities and technology infrastructure that are accessible, safe, secure, and sufficient in quantity and quality to ensure healthful learning and working environments that support and sustain the institution’s mission, academic programs, and services.

Evidence

Facilities master plan, including:

a. Equipment replacement policies/procedures: IT procedures, equipment replacement policy

b. Procedures for assessing sufficiency of physical facilities: facility, maintenance, and assessment log and procedure, equipment replacement policy

c. Policies and procedures for ensuring accessible, safe, and secure facilities: facilities master plan (see policies and procedures ensuring safe and secure facilities), facility, maintenance, and assessment log and procedure, equipment replacement policy

d. Policies/procedures for the use, storage, and disposal of hazardous waste: science department hazardous waste management plan

e. Technology master plan and planning processes: IT master policy (disaster recovery plan policy, p. 35)

LBHC maintains a campus that is safe and secure. Security videos, card-key entrances, sign in and sign out logs in each building, and automatic door locks (after work hours) increase the security of the campus. Staff have employee identification cards that they are encouraged to wear. Areas containing sensitive material are locked and always secured. Policies and procedures ensuring safe and secure facilities in the facilities master plan are followed closely.

The three two-story buildings all have elevators that make them wheelchair accessible, and signs are posted designating wheelchair accessible parking.

Crow culture and arts are embedded in the buildings, grounds, and architecture, which creates a warm and welcoming environment. Signage in the Crow language is posted throughout the campus.

Equipment needs are reviewed annually during employee evaluation reviews and equipment requests are defined by administrators and office equipment needs. The president and president’s council evaluates and prioritizes equipment requests. LBHC’s equipment replacement policy clearly identifies procedures for upkeeping and maintaining equipment, vehicles, and computers to ensure the equipment is sufficient for departmental needs and all equipment is kept in good working order.
LBHC maintenance staff use a facility, maintenance, and assessment log and procedure to ensure regular maintenance and upkeep of the buildings. The regular use of the assessment log ensures a safe and sufficient space for preserving and protecting the Crow culture and language and creating a safe learning environment.

In terms of technology, LBHC has sufficient quality and quantity of computers, printers, servers, wireless network access, and network/internet bandwidth to serve the College. As funds are available, equipment is replaced as warranties expire. LBHC maintains its software licenses annually and as needed. The information systems technology department has an IT master policy that was updated in 2021 and IT procedures that were created in 2023.

Shaleen Old Coyote (dean of administration) and Laurie Dawn Kindness, Spear Siding Sundance (2022)
Moving forward

The institution must provide its reflections on any additional efforts or initiatives it plans on undertaking as it prepares for the year seven evaluation of institutional effectiveness report.

The College plans on focusing on the following areas as it prepares for the year seven evaluation of institutional effectiveness report:

1. **Measuring mission fulfillment using the revised scorecard and using the findings:** In July 2023, LBHC updated its scorecard to focus on the two central goals of its mission: (1) Crow language, culture, and history and (2) student success (see the summary and detailed reports). In addition to these two goals, this new scorecard includes objectives that are more meaningful to the College. It has also integrated objectives that are more qualitative in nature, including four culture-related objectives and the general education and program learning outcomes assessment-related objectives. In fall 2023, LBHC plans on measuring and reporting each of its objectives for the previous academic year in its updated scorecard of college mission achievement. This scorecard will be discussed with the campus community and posted on the website, and the College will use the information to improve fulfillment of its mission.

2. **Generating and using disaggregated student success data:** LBHC has established a set of student achievement indicators including course completion (i.e., developmental education and general education courses), retention (i.e., fall-to-spring and fall-to-fall), graduation rates (i.e., certificate and degree), and licensure rates. This year, LBHC will focus on increasing the accuracy of its data, examining the data longitudinally, and sharing and using the data widely and regularly across campus. This year, LBHC will identify regional and national peer tribal colleges, and compare itself using IPEDS data, including several relevant student achievement indicators. Finally, LBHC will disaggregate its student achievement indicators by gender and age and align and benchmark itself against regional and national peers. Since the College has a small and homogeneous student population (i.e., mostly Crow, first generation, Pell eligible), disaggregating by these demographics seems most appropriate and meaningful.

3. **Program learning outcomes assessment:** In July 2023, LBHC faculty established a systematic program learning outcomes assessment process. Full-time faculty met for one week in July, where they learned about the purpose behind learning outcomes assessment and the difference between learning outcomes assessment and grades; they created curriculum maps and plans for their associate degrees (including a cycle for assessment); they formally assessed one program learning outcome for their degree for 2022-23; and they consulted about their findings and articulated next steps (see LBHC’s program learning outcomes webpage). This year, faculty will solidify the program learning outcomes assessment process and try to institutionalize it.
4. **General education learning outcomes assessment:** In July 2023, LBHC faculty established a systematic general education learning outcomes assessment process. Full-time faculty met for one week in July, where they learned about the purpose of learning outcomes assessment and the difference between learning outcomes assessment and grades; they created general education definitions and learning outcomes; they formally assessed one general education learning outcome for 2022-23; and they consulted about their findings and identified next steps (see LBHC’s general education learning outcomes webpage). This year, faculty will solidify the general education learning outcomes assessment process and try to institutionalize it.

5. **Implement the new 2023-26 strategic plan once it is finalized:** Over the next year, the College will focus on making adjustments post-pandemic. Departments will be encouraged to routinely refer to the strategic plan and know their goals within the strategic plan, with a focus on improving retention and graduation and how to provide resources to make that happen. LBHC will focus on meeting the objectives of the newly created strategic plan. Strategic plan objectives focus on improving academics, student success, technology, accreditation, and marketing. Performance measures were created and will be reviewed as specified, as well as a timeline to ensure completion of the stated objectives in the appropriate department or area within LBHC.

---

Crow summer institute faculty and staff participants (2022)