# LITTLE BIG HORN COLLEGE

Crow Agency, Montana

# AD HOC REPORT

In Response to Recommendations of the

**Northwest Commission on Colleges and Universities (NWCCU)**

Submitted to the NWCCU Board of Commissioners

*September 1, 2026*

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# I. Introduction

## 1.1 Purpose and Scope of This Report

The purpose of this report is to address the recommendations from Northwest Commission on Colleges and Universities (NWCCU) on board policies, procedures, and code of ethics. Little Big Horn College (LBHC) will also address the issue of having qualified administrators with defined authority, as well as sufficient staffing of staff and faculty.

LBHC is committed to building a culture of continuous improvement of institutional effectiveness. While a number of LBHC's responses represent preliminary efforts to be in compliance with NWCCU's standards, a primary goal is to improve the sensitivity of our institutional procedures while reflecting the true nature of our procedures. LBHC recognizes this is an ongoing process.

Additionally, LBHC recognizes that a number of these processes are already in place but may not have been formally followed. Currently, these processes are being formalized into LBHC's policies. Responses to some of the recommendations are processes that LBHC is actively developing in an effort of ongoing improvement. This includes LBHC's Board of Trustees, who are also currently working on improving their board governance according to the NWCCU Standards 2.A.1; 2.D.2; 2.D.3; ER 8; ER 9, 2.A.2; 2.A.3; 2.F.3; and 2.D.1.

## 1.2 Institutional Overview

Little Big Horn College (LBHC) is a small rural Tribal College located in the southeastern part of Montana, on the Crow Tribal Reservation with a land base of 2.3 million acres. LBHC serves communities in and around the reservation with a 190-mile radius, as well as the students who are enrolled in online courses. LBHC serves approximately 250-350 students per semester, and the majority of the students are enrolled Crow Tribal members.

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

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, along with the nation's tribal colleges and universities.  The College is a public two-year community college, located in Crow Agency, Montana ("Baaxawuaashe') in the heart of Crow Country.

In February 2026, LBHC Board of Trustees removed the former President, Neva Tall Bear, and appointed Patricia Whiteman as the Interim President. Patricia has since assumed the presidential responsibilities, and LBHC continues to improve the processes mentioned in the scope of work.

This change in presidents is the second change in presidents that LBHC has experienced in the last two years. With each change in presidents, a host of administrative positions, roles, and attitudes towards the importance of accreditation have changed.

In November 2025, in accordance with the Crow Tribe’s charter with LBHC (2023, JAR-23-06), the Crow Tribe held biannual elections of the LBHC Board of Trustees. The LBHC Board of Trustees received three newly elected members. In addition, the Chairman of the Crow Tribe appointed two additional board members to fill vacated positions.

*LBHC recognize that these processes are in place, but not followed there is ongoing effort to improve the sensitivity of these recommendations and to meet LBHC need and to reflect the actual processes as ongoing process and board of trustees are currently working on improving board governance according to the NWCCU Standards 2.A.1; 2.D.2; 2.D.3; ER 8; ER 9, 2.A.2;2.A 3; 2 F.3; and 2. D.1.*

### 1.3 Summary of Recommendations Addressed

| No. | Source | Topic | Standards / ERs |
|---|---|---|---|
| 1 | Spring 2026 Special Report | Board policies, procedures, and code of ethics | 2.A.1; 2.D.2; 2.D.3; ER 8; ER 9 |
| 2 | Spring 2026 Special Report | Qualified administrators with defined authority | 2.A.2; 2.A.3 |
| 3 | Spring 2026 Special Report | Sufficient staff, administrators, and faculty | 2.F.3 |
| 7 | Fall 2024 Evaluation of Institutional Effectiveness | Clery Act annual security report | 2.D.1 |

## Recommendation 1: Board Policies, Procedures, and Code of Ethics

| | |
|---|---|
| **Source** | Spring 2026 Special Report |
| **Standards / ERs Cited** | 2020 Standards 2.A.1; 2.D.2; 2.D.3; ER 8; ER 9 |

### Recommendation Text

> *Establish, formally adopt, and adhere to revised Board policies, procedures, and a code of ethics that are publicly available on the institution's website and that clearly define the roles, responsibilities, communication channels, and governance structures of the institution, thereby providing the administration with sufficient autonomy to fulfill its mission. (2020 Standard(s) 2.A.1; 2.D.2; 2.D.3; ER 8; ER 9)*

# Standard Two – 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.

## Governance

2.A.1 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. Institutions that are part of a complex system with multiple boards, a centralized board, or related entities shall have, with respect to such boards, written and clearly defined contractual authority, roles, and responsibilities for all entities. In addition, authority and responsibility between the system and the institution is clearly delineated in a written contract, described on its website and in its public documents, and provides the NWCCU accredited institution with sufficient autonomy to fulfill its mission.

2.D.2 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.

2.D.3 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.

## Eligibility Requirements

1. INSTITUTIONAL INTEGRITY: The institution establishes and adheres to ethical standards in all of its academic programs, operations, and relationships.
2. GOVERNING BOARD: The institution has a functioning governing board(s) responsible for the quality and integrity of the institution and for each college/unit within a multiple-unit district or system, to ensure that the institution's mission is being achieved. The governing board(s) has at least five voting members, a majority of whom have no contractual or employment relationship or personal financial interest with the institution. Institutions that are part of a complex system with multiple boards, a centralized board, or related entities, shall have, with respect to such boards, clearly defined authority, roles, and responsibilities for all entities in a written contract(s). In addition, authority and responsibility between the system and the institution is clearly delineated, in a written contract, described on its website and in its public documents, and provides NWCCU accredited institutions with sufficient autonomy to fulfill its mission.

## Narrative Response

- **Describe the process undertaken to review and revise Board policies, by laws, and the code of ethics (. e.g., governance consultant engaged, committee formed, timeline).**

  In January 2026, the Board of Trustees at Little Big Horn College initiated a process to improve governance. This initiative aims to strengthen governance, clarify the roles of the Board and the President, enhance oversight and accountability, and ensure alignment with the College's Charter, Joint Action Resolution (JAR), and the standards set by the Northwest Commission on Colleges and Universities (NWCCU). During the spring and summer of 2026, the Board engaged directly with the NWCCU to discuss its governance concerns and expectations. These discussions informed subsequent Board actions, which included the adoption of a new Board Code of Conduct on June 4, 2026. Additionally, on June 11, 2026, the NWCCU conducted governance training that all current Trustees attended. This training focused on Board roles and responsibilities, governance and administrative boundaries, fiduciary responsibilities, accreditation expectations, and effective governance practices. The improvement process began with a Board Retreat on January 16-17, 2026, where Trustees discussed governance responsibilities and institutional priorities. Although only four to five members attended the retreat, it marked the start of important ongoing improvements. On June 4, 2026, the Board adopted a Code of Ethics, which sets standards for Trustee conduct. All eleven members signed this Code, demonstrating their commitment to ethical governance. On August 26, 2026, the Board formally adopted an updated Board Policy Manual. This new manual reflects a comprehensive review and establishes a framework for governance and accountability. The Board acknowledges that effective governance requires ongoing evaluation and continuous improvement.

- **Identify each policy document that was revised or newly adopted (e.g., Board by laws, board of trustees versus the President and administration (governance vs. management distinction).**

  The Little Big Horn College Board of Trustees recognizes that the current Board Manual is outdated and no longer aligned with the updated Charter and Joint Action Resolution (JAR). Consequently, the Board has undertaken a comprehensive revision of the Manual to establish a modern governance framework. The revision addresses key areas of governance, including Board authority, the relationship with the President, evaluation procedures, committee roles, conflicts of interest, conduct expectations, and accountability, with a focus on distinguishing governance from administration. The Board exercises its authority through policy-making and oversight, while the President manages daily operations. On June 4, 2026, the Board adopted a Board of Ethics/Code of Conduct, signed by all eleven members, which clarifies expectations for ethical behavior and accountability. A Drafting Committee was established to guide the revision process, culminating in the formal adoption of the updated Board Policy Manual on August 26, 2026. These revisions provide a clearer framework for authority, ethical conduct, and governance separation, aligning with the 2024 Charter, JAR, and NWCCU standards, while laying the groundwork for continuous governance improvement.

- **Describe the communication channels and reporting structures established between the Board and Administration (e.g., regular President's reports, defined lines of authority, escalation protocols).**

  Little Big Horn College has improved communication and reporting between the Board of Trustees and the College administration. The revised Board Policy Manual outlines the roles of the Board and the President, with the President serving as the primary link between them. The Board operates collectively, while the President manages daily operations. Individual Board members cannot direct employees or make administrative requests independently; all communication goes through the President, ensuring clear authority and reducing conflicting directives. The President provides regular updates on institutional operations, strategic priorities, and financial conditions at monthly Board meetings. Matters falling under the President's authority are handled through the administrative structure. At the same time, issues concerning Board policy or the President's evaluation are escalated to the Board for collective action. Board committees assist with focused review before presenting matters to the full Board, ensuring transparency and accountability in governance. This framework fosters consistent communication, maintains appropriate separation between governance and management, and underscores the College's commitment to effective governance and continuous improvement. The Board's role is to provide oversight, establish policy, and hold the President accountable for institutional performance. At the same time, the President and administration are responsible for implementing Board policy and managing the College's daily operations. This framework provides a more consistent and accountable communication structure between the Board and Administration and supports the College's commitment to continuous improvement and effective governance.

- **Confirm and describe how these policies, procedures, and the code of ethics are publicly available on the institution's website, providing the specific URL(s).**

  Little Big Horn College is dedicated to making its governance documents publicly accessible, promoting transparency, accountability, and a clear understanding of the Board's governance responsibilities. The Board Policy Manual, formally adopted on August 26, 2026, and the Board of Ethics/Code of Conduct, adopted on June 4, 2026, will be available on the College's official website by September 2026. Additionally, official minutes from Board meetings will also be accessible through the website. Beyond online access, copies of the current Board Policy Manual and the Board of Ethics/Code of Conduct will be maintained in the Little Big Horn College Library, allowing students, employees, Trustees, and members of the public to review them. The College will create a dedicated section on its website for Board governance, where the current Board Policy Manual, Board of Ethics/Code of Conduct, Board meeting minutes, and other relevant governance documents will be accessible. The College will ensure that the latest versions are available online and will clearly mark any outdated documents as archived. The target completion date for this initiative is **September 16, 2026**. After these documents are made available, the College will provide the Northwest Commission on Colleges and Universities (NWCCU) with the specific URLs where the documents can be accessed.

- **Describe any Board orientation, training, and attestation process related to the new code of ethics and governance policies.**

  On June 11, 2026, all eleven Board members participated in a two-hour governance training led by NWCCU Liaison Teresa Rivenes. The training covered Board roles, fiduciary duties, institutional oversight, accreditation expectations, and governance practices. Following the adoption of the revised Board Policy Manual on August 26, 2026, these policies and the Code of Ethics will be integrated into Board orientation and ongoing training. Throughout 2026, the Board has focused on accreditation compliance, governance improvement, and updating governing policies. Key actions included governance training, forming a Drafting Committee, aligning policies with the updated Charter, and adopting the Board of Ethics. With these priorities addressed, the Board is set to enhance its professional development activities. Plans include further governance training, participation in the TCU Futures Project, and training focused on effective governance and strategic planning. The Board also aims to engage in strategic planning to connect its oversight with the College's mission and develop a self-evaluation tool for assessing effectiveness. The College views Board training as an ongoing process, incorporating orientations for new Trustees, refresher training for current members, and periodic reviews of governance practices to align with governing documents and NWCCU Standards. These efforts lay a foundation for continued orientation, governance training, ethical practices, strategic planning, self-assessment, and professional development while ensuring accreditation alignment.

- **Explain how these changes provide the administration with sufficient day-to-day operation autonomy to fulfill the institutional mission, consistent with ER 8 and ER 9.**

  The Little Big Horn College (LBHC) Board of Trustees is entrusted with the governance, stewardship, and long-term success of the institution. The current draft Board Manual establishes a strong governance framework, including the authority of the Board, delegation of administrative responsibilities to the President, Board accountability, presidential evaluation, complaint procedures, and policy development processes. The proposed amendments are intended to strengthen these provisions by providing greater clarity regarding institutional priorities, Board responsibilities, presidential authority, governance accountability, and succession planning.

  These enhancements are designed to support effective governance, ensure institutional accountability, promote transparency, and maintain compliance with accreditation expectations and the mission of Little Big Horn College. They further reinforce the distinction between governance and administration while preserving the Board's authority over strategic direction and institutional oversight.

- **Describe the institution’s plan for periodic review of these policies plan for periodic review of these policies going forward (e.g., annual Board policy review cycle). Conflict of Interest Policy, Code of Ethics, Delegation of Authority Policy, Board-President Communication Protocol).**

  Annual Policy Review Requirement

The current manual requires periodic review of Board policies through the Governance and Nominations Committee. The proposed amendment would require an annual review of all Board policies, procedures, and bylaws before the start of each academic year. This review would ensure continued compliance with accreditation standards, changes in law, institutional priorities, governance best practices, and strategic objectives. Annual review promotes a culture of continuous improvement and institutional accountability.

- **State the date(s) of formal Board adoption of each policy, with reference to the approving Board meeting minutes.**
  Formal Adoption and Maintenance of Board Minutes
  The Board Manual currently requires approval of meeting minutes and inclusion within the official records of the College. The proposed enhancement would explicitly require formal Board action approving minutes and inclusion of approved minutes within the official LBHC Board Manual and permanent institutional records. Any amendments to previously approved minutes would also require formal Board approval and documentation. This process promotes transparency, accuracy, and preservation of the institutional record.
  These proposed governance enhancements build upon the extensive framework already established within the LBHC Board Manual. Collectively, they provide greater clarity regarding Board authority, presidential accountability, stakeholder participation, governance evaluation, policy review, complaint resolution, and succession planning. Adoption of these amendments will strengthen institutional governance, improve accountability, support accreditation expectations, and advance the mission of Little Big Horn College in service to the Apsáalooke Nation and future generations

- **Explain how the revised policies clearly delineate the roles and responsibilities of the**
  **Board Roles, Responsibilities, and Institutional Priorities**
  The draft manual outlines the Board's responsibility for governance, strategic leadership, fiduciary oversight, institutional accountability, and policy direction. The proposed amendments would further require the Board to establish annual institutional priorities before the beginning of each academic year and monitor

progress through measurable performance indicators. These priorities should align with student success, financial sustainability, accreditation compliance, preservation of Apsáalooke culture and language, workforce development, community needs, and strategic growth initiatives. Such annual priority setting would strengthen the Board's capacity to evaluate institutional performance and guide long-term planning.

**Delegation of Authority to the President**

The Board Manual currently delegates broad administrative authority to the President while reserving governance responsibilities to the Board. The proposed revisions would provide a formal delegation matrix clearly identifying responsibilities reserved exclusively to the Board and those delegated to the President. Reserved matters would include strategic planning, adoption of Board policies, presidential employment actions, budget approval, accreditation governance matters, and major capital projects. Delegated responsibilities would include day-to-day operations, personnel administration, contracts, organizational management, grants administration, and implementation of Board policies. Such clarification would enhance governance effectiveness and reduce uncertainty regarding decision-making authority.

**Presidential Evaluation Process**

The current manual requires the Board to conduct an annual evaluation of the President and identifies evaluation factors, including institutional leadership, student success, financial stewardship, accreditation, external relations, and Board relations. The proposed amendments establish a formal evaluation procedure that includes annual goal setting, presidential self-assessment, Board evaluations, stakeholder feedback, executive-session review, and development of performance goals for the upcoming year. A standardized evaluation instrument would promote consistency, accountability, and alignment between presidential performance and institutional priorities.

**Board of Trustees Self-Evaluation**

The Board Manual recognizes the importance of periodic self-assessment and continuous improvement. The proposed Board self-evaluation process would require annual review of governance practices, strategic leadership, fiduciary responsibilities, policy compliance, committee effectiveness, meeting management, Trustee participation, and stakeholder engagement. The results would be used to improve Board performance, identify governance training needs, and strengthen institutional leadership. The Board intends to develop and deploy a novel self-evaluation instrument to facilitate this process and complete it within the next two months.

**Trustee Complaint Process**

Articles governing Trustee conduct, ethics, conflicts of interest, investigations, and complaints establish the foundation for addressing Trustee misconduct. The proposed revisions would create a more comprehensive Trustee Complaint Process that includes complaint submission requirements, review timelines, notification procedures, investigations, due-process protections, corrective measures, and documentation standards. The process would ensure accountability while protecting the rights of Trustees and maintaining confidence in Board governance.

**Presidential Complaint and Grievance Process**

The existing manual establishes Board's responsibility for reviewing complaints involving the President. The proposed amendments would expand these provisions by creating a detailed Presidential Complaint and Grievance Process. New procedures would address complaint filing requirements, preliminary review standards, investigation protocols, use of independent investigators, administrative leave procedures, findings, Board determinations, response opportunities for the President, and record retention requirements. These provisions would ensure fairness, accountability, and consistency in addressing concerns involving the College's chief executive officer.

**Presidential Search and Selection Procedures**

The draft manual recognizes that selecting the President is among the Board's most important responsibilities and permits the use of search committees and stakeholder participation. The proposed revisions establish a comprehensive Presidential Search and Selection Policy that includes defined search committee membership, candidate evaluation criteria, stakeholder consultation, and formal Board selection procedures. Search committees may include representatives from the Board, faculty, staff, students, community members, and professional consultants. Recommendations from these groups would remain advisory in nature, while final selection authority remains exclusively with the Board of Trustees. Candidate evaluations would consider leadership ability, accreditation experience, fiscal management skills, commitment to tribal higher education, cultural knowledge, strategic planning capabilities, and communication effectiveness.

**Bylaws Revision and Drafting Committee Responsibilities**
To ensure that the governing documents remain current and effective, the Board would direct the Drafting Committee to conduct a comprehensive review of the Little Big Horn.

The College Board of Trustees Bylaws and develop recommended revisions. A completed draft is anticipated by September 18, 2026, for presentation, review, and approval at the next regularly scheduled Board meeting. This effort supports the Board's commitment to continuous governance improvement and alignment among the Charter, Bylaws, and Board Manual.

## Suggested Evidence

| Suggested Evidence / Exhibit | Description | Exhibit # |
|---|---|---|
| Revised Board Policy Manual / Bylaws | Full text of adopted/revised policies, with adoption date noted<br>Adopted- August 26, 2026 | 1 |
| Board-adopted Code of Ethics/Conduct | Signed or board-certified copy, dated **(6/4/2026)** | 2 |
| Board meeting minutes — policy adoption | Minutes documenting formal review and vote to adopt | 3 |
| Delegation of Authority document | Written delegation from Board to President defining administrative autonomy **(4/18/2026)** | 4 |
| Governance structure / organizational chart | Diagram showing Board, President, and administrative reporting lines | 5 |

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|---|---|---|
| Website screenshot(s) / URL log | Evidence that policies and code of ethics are publicly posted lbhc.edu | 6 |
| Board orientation/training records | Sign-in sheets, agendas, or certification of training on new policies. | 7 |
| Board self-evaluation results (if available) | Documentation of Board's assessment of governance practices<br>September 16, 2026 | |

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## Exhibits for the board: Board of Ethics, Board Manual, Board Meeting Minutes, Board

## Recommendation 2: Qualified Administrators with Defined Authority

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|---|---|
| **Source** | Spring 2026 Special Report |
| **Standards / ERs Cited** | 2020 Standards 2.A.2; 2.A.3 |

### Recommendation Text

*Ensure the institution is led and staffed by qualified administrators with appropriate authority, responsibility, and accountability to manage the institution and its departments. (2020 Standard(s) 2.A.2; 2.A.3)*

### Narrative Response

- **Describe the review conducted of the administrative structure, including any gaps identified in leadership capacity or qualifications.**

  Little Big Horn College has a formalized system for reviewing our administrative structure by conducting Annual Employee Performance Evaluations (e.g., Administration, Faculty, Staff…etc.). The faculty handbook contains descriptions of administrative staff duties and responsibilities (Faculty Handbook Pg 4, 1.3). These administrative responsibilities are further explained in the administrators' job descriptions.  We recognize that the current Annual Employee Performance Evaluations are not sufficient in identifying gaps in leadership capacity or qualifications, specifically for administrators. Our goal by December 31, 2026, is to create a new evaluation system that includes a stronger, more rigorous rating system that would identify strengths, weaknesses, and gaps in leadership capacity or qualifications specifically for the administrative Deans. The most current performance evaluations for all staff at Little Big Horn College were conducted during the months of July and August of 2026.

The President's Council convenes and serves in an advisory capacity for college business operations. The President's Council's collective vast imminent knowledge in their field, and years of experience at Little Big Horn College serves to fill gaps in leadership or qualification should one be identified.

- **List each key administrative position (President, Vice Presidents/Deans, Business Officer, Registrar, etc.), the current incumbent, and a summary of their qualifications and credentials relevant to the role.**

President- Patricia Whiteman (Interim): 7 years of Administrative experience as Dean of Students. She has worked on accreditation since the 2017 EIE. Patricia has served on various institutional councils and organizations, gaining a valuable understanding of all LBHC operational policies and procedures. Patricia has managed many grants since 2014, totalling upwards of 8 million. She has also served as a consultant to the AICF Strategic Enrollment Managers (SEM) committee.

Dean of Students- Patricia Whiteman: Prior to the Dean of Students position, she started employment as the Student Success Director and served in the review and updating/creating of policies and procedures; involved in Accreditation efforts. Data Analysis including course completion rates, to look at recruitment, retention, and graduation rates, and used that to adjust student programs accordingly. Patricia has written and managed grants that promote student success.

Dean of Academics - Tim McCleary: History faculty member since 1991. He has held the position of faculty department head in general studies on several occasions. Tim was the AIHEC Faculty Member of the Year in AY13-14. Tim has received specialized training in anthropology and archaeology, including a PhD in those areas, and is a leader in Crow traditional knowledge. Proficient with learning systems, paired with the ability to design, review, and improve academic programs.

Dean of Administration- Aldean GoodLuck: Started in the position of accounts payable officer/finance supervisor. Upon completion of her Master's in Business Administration, she moved into the position of Chief Finance Officer. She was transferred to the Dean of Administration in 2025 and has recently completed her PhD in Higher Education. Oversees daily institutional operations, including financial, various business functions, risk management matters, and long and short-term planning for the college.

CIO - Franklin Cooper: Started as an Instructor in Information Systems at LBHC and also as a facilitator and mentor for a student leadership program concurrently, while also serving as Chief Information Officer since 2001. In 2007, Franklin completed a Master's in Business Administration from Gonzaga University. He has since grown the Information Capacity at Little Big Horn College.

CFO - Vacant

- **Describe how authority, responsibility, and accountability are formally assigned to each administrative position (e.g., written job descriptions, delegation memos, organizational charts).**

Job Descriptions are adhered to as an outline of institutional job duties and responsibilities. Little Big Horn College's organizational chart provides a visual representation of supervisory responsibilities, not explicitly noted in policy, but continues to be the common practice. Supervisory Responsibility is expressed on Pg 22 and outlines the responsibility they have to those they supervise when managing the employee's time. Accountability is outlined in the Employee Code of Conduct (Employee Policies and Procedural Manual Pg 20, 3.3.). The Chain of Command (Pg 20 3.4) exists so that when an action or issue arises, applicable policy and procedure can be referenced and followed. This allows the appropriate supervisor to proceed in managing what arises and determine whether it needs to be taken up the chain of command.

Delegation emails are sent college-wide when the President or a Dean is off campus for various reasons. This acknowledges the President or Dean's absence and delegates the responsibility to those with experience in situations that may arise upon the President's or Dean's absence. This is not stated in policy or procedure, as it has been a commonly accepted procedure.

- **Describe the hiring, appointment, or reassignment process used to fill administrative vacancies, including how qualifications are verified.**

The hiring, evaluation of credentials, evaluation of job performance, and (if necessary) termination of LBHC's president is the direct responsibility of the LBHC Board of Trustees.

Once a president is selected, the board delegates all operational decisions to the president. The president then has the authority to recruit, advertise, hire, appoint, reassign, evaluate, and (if necessary) terminate all LBHC employees as described in the Employee Policies and Procedural Manual.

During the previous administration prior to February 18, 2026, the President laterally transferred the Chief Finance Officer to the position of Dean of Administration, and her supervisory position was explained that she would manage both finance and administration until a new Chief Finance Officer was hired (Employee Policies and Procedural Manual Pg 45, 7.8 & Memo of lateral transfer).

There are instances of temporary appointments of individuals to vacant positions. These types of appointments are made by the President to ensure the continuous function of a program or project. (Employee Policies and Procedural Manual Pg 45, 7.6) The President fills this position by targeting an individual based on their experience, qualifications, and relevant knowledge to the vacant position. Qualifications are verified through screening of their transcripts and resume, and their immediate knowledge of the vacant position.

- **Describe the performance evaluation process used to hold administrators accountable for departmental outcomes.**

LBHC recognizes that the current evaluation processes in place are a starting point for the evaluation of administrators. In an effort to continuously improve this process, LBHC plans to refine both the sensitivity of these evaluations to gather data as well as to genuinely reflect the processes used at LBHC. The plans for continual improvement are LBHC's effort to not only improve institutional effectiveness, but, as a result of this improvement, be in better compliance with NWCCU standards. These will be conducted annually, i.e., in the spring (~April 1). An Evaluation form specifically for Administrators will be created that includes Authority, responsibility, and accountability, better quantified to hold administrators accountable before the next annual evaluation.

- **Identify any interim or acting administrative appointments, the rationale, and the plan/timeline for permanent appointment.**

The interim President's contract was approved on 8/26/26 by the BOT for a 1-year extension with a 6-month evaluation period. The CFO's responsibilities are currently delegated to the Dean of Administration's job duties (See Lateral Transfer Memo attached as evidence). The CFO has been advertised area-wide, and we currently have two complete applications. There will be a new permanent CFO hired within the next two months. The Dean of Students will be advertised internally for 5 days. The announcement will be advertised area-wide by 9/8/26. Currently, these job duties are still being handled by the previous Dean of Students, Patricia Whiteman.

**Explain how the current administrative structure enables effective day-to-day management of the institution and its departments.**

LBHC's Organizational Chart was updated and approved by the LBHC board of trustees on August 26, 2026. This updated organization system outlines and allows for the delineation of various departments and their responsible administrators. [See exhibit with newly BOT-Approved LBHC Organizational Chart]

### Suggested Evidence

| Suggested Evidence / Exhibit | Description | Exhibit # |
|---|---|---|
| Organizational chart | Current chart showing all administrative positions and reporting lines | 9 |
| Job descriptions — key administrators | Descriptions listing required qualifications, authority, and responsibilities | 10 |
| Resumes/credential summaries | Qualifications of current administrators in key roles | 11 |
| Board minutes — administrative appointments | Minutes documenting Board approval of key hires/appointments | 12 |
| Delegation of authority matrix | Document mapping decision authority to specific positions | 13 |
| Administrator performance evaluation instrument | Template/process used to evaluate administrator performance | 14 |
| Position vacancy / succession plan | Status of any vacant or interim administrative roles and fill timeline | |

## Recommendation 3: Sufficient Staff, Administrators, and Faculty

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|---|---|
| **Source** | Spring 2026 Special Report |
| **Standards / ERs Cited** | 2020 Standard 2.F.3 |

### Recommendation Text

> *Employ staff, administrators, and faculty sufficient in role, number, and qualifications to achieve organizational responsibilities, educational objectives, and the integrity and continuity of student support services and academic programs. (2020 Standard(s) 2.F.3)*

### Narrative Response

- Historically, LBHC has never adopted a formalized process for staffing gap/needs analyses. Previous decisions regarding staffing concerns appeared to have been made on an informal and reactive basis (e.g., loss of a science faculty member resulted in the advertising and hiring of a new science faculty member). Requests for these hirings would have been submitted to HR by administrators responsible for the department where a need existed. Many of these decisions were driven by budgeting and the availability of funding for such positions, as well as the availability of qualified applicants for the advertised positions proximal to the college.

From there, the responsibilities of the previous employee are dispersed to existing employees or, with administrative approval, the position is advertised. Applicants who complete the application process are interviewed and evaluated by a no less than three-member interview panel of current LBHC employees. Based on the scores of these interviews/evaluations, recommendations of applicants for hire are presented to the LBHC president, and a selection and offer for the position is made.

LBHC is in the process of exploring a robust and reliable system for staffing gap/needs analyses through identification and evaluation of how previous staffing decisions were made at LBHC. LBHC is also working to identify staffing gap/needs analysis models that have already been developed and utilized by other institutions and organizations. LBHC has–and will be continuing–to consult peer institutions and tribal colleges to see what models have previously been utilized. In addition, LBHC has approached the American Indian Higher Education Consortium (AIHEC) to solicit their advice on staffing gap/needs analyses. AIHEC has responded and has offered overall accreditation support.

Once an LBHC analysis system is developed, it will be sent out to each department to identify staff gaps and needs. LBHC's goal for adoption of this formalized staffing gap/needs analysis is December 31, 2026, with implementation no later than December 31, 2027. Data from the adopted staffing gap/needs analysis can be used as a tool to refine job descriptions by LBHC's human resources, as well as to identify the changing responsibilities for current employees. In addition, LBHC policies and procedures should formally outline the adopted plan for staffing gap/needs analysis. The new policies and procedures will be outlined for use across academic, student support services, and administrative functions.

- **Identify specific positions added, filled, restructured, or eliminated since the recommendation was issued, and the rationale for each change.**

  The current Interim President was previously the Dean of Students full-time prior to appointment in February of 2026. She has filled both roles while ensuring that vital services are assigned to other student services staff to ensure operations run smoothly with no interruptions.

  The Financial Aid Director had suddenly resigned without notice in March of 2026. This resulted in a drastic delay in student aid and scholarship distribution. Key employees stepped in to fill the role of Interim Financial Aid Director immediately and worked closely with the Department of Education to ensure proper procedures were followed to ensure student financial aid and scholarships were properly disbursed.

Human Resources was filled on a Temporary Appointment basis to ensure the continuous function of institutional operations. HR has now accepted the position full-time.

CFO advertised, Math and Humanities instructor filled. CFO position description rewritten to better align with LBHC's fiduciary responsibilities and needs expected from the position. This position is currently vacant, advertised, and applications are being accepted due to its vital administrative position.

- **Describe current faculty and staff-to-student ratios and how they compare to institutional benchmarks or peer tribal colleges.**

  Due to a variety of factors, LBHC's course enrollment varies significantly from semester-to-semester and course-to-course. However, the previous 2026 data reported to IPEDS indicated LBHC's overall average staff-to-student ratio was 12 to 1. We are currently researching appropriate benchmarks to support the student success rates. LBHC has been working with AIHEC on creating a schedule of required data (per institution preference) to review on a regular basis.

- **Explain how current staffing levels ensure continuity of student support services (e.g., advising, financial aid, financial office, library, tutoring) without interruption.**

  Pages 26-38 of the LBHC *Catalogue* detail the student support services offered at LBHC. Students are first directed to visit the Admissions Department. Upon completion of their admissions packet, students are given a checklist of support services to visit. Following admissions, new students are directed to Accuplacer placement testing before meeting with the First-Year Coordinator and/or Student Services Director to register for classes. Returning students who have declared their major meet with their assigned advisor for registration. Students are also directed to the Information Technology (IT) Department for their LBHC email, CloudRam, and technology needs.

  After registering for classes, students are directed to the Financial Aid Director. Lastly, students are directed to the LBHC Bookstore to acquire their textbooks.

  Throughout the academic semester, students have access to the Student Success Center as well as tutoring from second-year students who have demonstrated success in their previous coursework.

The LBHC Library and Archives provide students with ample resources that both build and supplement their coursework and study. In addition, the Library provides information fluency and resources training as well as computers for student and community use. The archives is the premier collection of Apsaalooke historical material in the nation.

All these student support services are available to students year-round. In addition, all these departments and positions are staffed with at least one full-time employee.

To date, LBHC has not formally adopted a staffing gap/needs analysis, which would indicate the continuity of these student support services. However, LBHC is actively exploring a robust system for formal adoption and implementation no later than December 31, 2027. A key characteristic of this analysis that the LBHC is considering is the ability to yield data about the continuity of student support services.

Some key changes to LBHC student support services have occurred recently. The current Interim President was previously the full-time Dean of Students prior to appointment in February of 2026. She has filled both roles while ensuring that vital services are assigned to other student support services staff to ensure operations run smoothly with no interruptions.

The Financial Aid Director suddenly resigned without notice in March of 2026. This resulted in a drastic delay in student aid and scholarship distribution. Key employees stepped in to fill the role of Interim Financial Aid Director immediately and worked closely with the Department of Education to ensure proper procedures were followed to ensure student financial aid and scholarships were properly disbursed.

LBHC's formal adoption of a staffing gap/needs analysis will provide data about the adequacy of staffing within these student support services to better respond to situations such as the example above. In addition, LBHC will be cross-training staff in the key positions of student support services (e.g, financial aid, admissions, registrar, bookstore, IT, student success…etc.).

- **Explain how current staffing levels ensure continuity and integrity of academic programs (e.g., course coverage, program review capacity, assessment).**

  Based on the requirement for each program of study, a standard list of courses is designed for both the fall and spring semesters, listed in the *Catalogue*. These course offerings detail a sequence of courses to be roughly followed in students' first and second years. In addition, a template plan of study for each program is outlined in the *Catalogue*. Academic advisors meet semesterly with students declaring their major within their program to re-evaluate their plans of study while developing a schedule for the upcoming semester.

Faculty are expected to instruct a course load of 15 credit hours per semester. The courses taught within each semester are well-established and typically remain consistent for each faculty member.

Annually, all faculty responsible for overseeing a program of study complete a program review. While the current template for program reviews does not contain a specific section discussing staffing needs within each program. However, faculty are encouraged to reflect on "*Next Steps*" within their program reviews–which could include staffing needs.

LBHC plans to add a section to the annual program reviews specifically asking faculty to reflect on the staffing adequacy and needs of their programs by May 31, 2027. As part of this staffing adequacy section. In addition to annual program reviews, (course) completion data can be used to assess student success–and thereby, staffing adequacy. [Exhibit 22]

The adoption/implementation of a formal staffing gap/needs analysis by December 31, 2027, will also add a more robust assessment of staffing needs within academic programs.

- **Describe the process for verifying and documenting faculty and staff qualifications (credentials, licensure, degrees) relative to their assigned roles.**

  The Faculty Handbook includes requirements for teaching, including an educational tract that aligns with the position they were hired for. We document this by requiring official transcripts and a resume with previous work experience.

  Faculty job descriptions also specify what qualifications are necessary for faculty members' roles. Human Resources is responsible for screening transcripts and resumes and verifying that they have the qualifications relative to their assigned role.

- **Describe budget allocations and resource planning that support the staffing plan, including any grant-funded or temporary positions and the plan for their sustainability.**

  The Chief Finance Officer (CFO) works with the Budget Advisory Committee (BAC), but because the CFO position is vacant, no staff member has taken the lead. The Dean of Administration and Human Resources Director has been taking on some of the duties and responsibilities. Meetings have been held with James Loran, CPA, to determine LBHC's financial status. LBHC will not know its budget allowability for all staffing allocations until the FY 2025 audit is complete. FY 2024 fieldwork is set for October 12, 2026. The goal is to complete the FY 2024 audit by December 2026. LBHC will begin FY 2025 field work shortly after. In the meantime, the finance department will be mindful of allowability and will likely not create any new positions without a clear understanding of the institution's financial position.

- **Describe retention and succession planning strategies, including professional development and workforce pipeline efforts (e.g., partnerships supporting Native faculty/staff pipeline)**

  These benefits are included as benefits for all LBHC Employees. The direct benefits are 401K at 5%, life insurance and long term disability at 2%, cash back option of 8% that can go towards health insurances, more retirement benefits, life insurance, and benefits counseling (Pg 51, 8.4), Paid holidays i.e., birthday leave, Crow Fair, bereavement, handgames, 32 hour work weeks with 8 hours included with the understanding that faculty members have duties that need to be performed outside of regular hours. LBHC has other indirect benefits for employees as well. We offer employee tuition waivers, use of campus facilities, free parking, and library resources. (Pg 51- 54) Grants provide pipelines for graduates of LBHC to gain their education at other institutions, specific and relevant training to return to LBHC as employees (i.e., “growing our own”). Additionally, LBHC encourages and provides professional development and institutional support for current employees to further their education that complements their position at LBHC.

  We will be working on a succession plan, and our goal is to have it implemented by September 1, 2027.

## Suggested Evidence

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| Suggested Evidence / Exhibit | Description | Exhibit # |
|---|---|---|
| Staffing gap analysis / needs assessment | Analysis identifying staffing needs by department | |
| Current staff/faculty roster with credentials | Roster mapping each position to the qualifications held<br>LBHC List of Emplyee Job Titles, Degre… | 17 |
| Faculty/staff-to-student ratio data | Data table, trended over recent years | 18 |
| | | |

| | | |
|---|---|---|
| Budget documents — staffing allocations | Budget lines showing funding for staff/faculty positions | 20 |
| Student support services staffing plan | Staffing detail for advising, financial aid, library, tutoring, etc. | 21 |
| Program review data referencing staffing adequacy | Excerpts from program reviews addressing staffing sufficiency | 22 2023-24-LBHC-ProgramReviewReport-BlankTemplate.docx |
| Succession planning / retention program documentation | Materials describing retention strategy and pipeline efforts- to be completed 9/1/2027 | 23 |

# Recommendation 7: Clery Act Annual Security Report

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|---|---|
| **Source** | Fall 2024 Evaluation of Institutional Effectiveness |
| **Standards / ERs Cited** | 2020 Standard 2.D.1 |

## Recommendation Text

> *Complete the annual Clery report updates as required by the Department of Education and make these reports readily available to the campus community and prospective students. (2020 Standard(s) 2.D.1)*

### Narrative Response

The Dean of Administration and the security team are reviewing the current Clery Act posted on the Little Big Horn College website (lbhc.edu). They will hold monthly meetings with security, maintain daily log sheets, and submit weekly reports to the Dean of Administration. The team will complete annual training to stay current on safety, Title IX, Clery, Active Shooter, and CPR. The team will also research ways to complete the 2025 Clery Report on or before and post it to the LBHC website.

- **Confirm completion and timely submission of the most recent Annual Security Report (ASR)/Clery Act disclosure to the U.S. Department of Education, including the submission date.**

  The Chief Information Officer has posted the Clery report on the LBHC website.

- **Describe the internal compliance calendar and the responsible office/position that ensures the ASR is completed and submitted annually going forward.**

  Monthly meetings with security will continue to ensure the ASR is completed and submitted annually, while the internal compliance calendar and responsible position stay in communication.

- **Describe how the ASR is made readily available to current students and employees (e.g., direct notification/email, learning management system posting, printed copies).**

  The ASR will be available to current students and employees via email; if they would like a hard copy, one will be provided upon request. **It will be posted on the LBHC website.**

- **Describe how the ASR is made readily available to prospective students (e.g., admissions office distribution, catalog reference, website link provided during the application/enrollment process).**

  The Chief Information Officer posts the ASR on the Little Big Horn College website each year, where prospective students can access it.

- **Provide the specific website URL where the ASR/crime statistics are posted, and confirm the report is current.**

  The ASR is posted on [LBHC.edu](LBHC.edu), and it can also be found in the student handbook, The Ram Tracker, pages 8 & 9, distributed to all students annually. [http://www.lbhc.edu/sites/default/files/lbhc/handbook/2024-25-RamTrackerStudentHandbook.pdf](http://www.lbhc.edu/sites/default/files/lbhc/handbook/2024-25-RamTrackerStudentHandbook.pdf)

- **Describe training provided to Campus Security Authorities (CSAs) on Clery Act reporting obligations.**

  The Human Resource Director is researching Vector training for Security and possibly all employees to cover topics such as Clery, Title IX, Active Shooter, and CPR. Two security staff attended safety training covering topics such as OSHA, chemical disposal, and falls. A copy of their certificate will be placed in their personal file in the HR office. Also, working with the Human Resource Director the goal is to get the Vector Training out to all employees, students, and administrators.

- If any past reporting gaps existed, describe the corrective action taken and safeguards implemented to prevent recurrence.

  Safe guards, corrective action plans, and continuous planning pertaining to the job will be added to job descriptions and submitted to the President's Council to be approved. New annual evaluations will be created to reflect these new duties in the job descriptions so employees are evaluated on them, and they will be done every year, so they do not fall behind.  New annual evaluations will be implemented by December 31, 2026, with the directive to be completed college-wide by April 1, 2026.

### Suggested Evidence

| Suggested Evidence / Exhibit | Description | Exhibit # |
|---|---|---|
| Most recent Annual Security Report (ASR) | Full current-year Clery Act disclosure document | 24 |
| Dept. of Education submission confirmation | Confirmation/receipt from the Campus Safety and Security Survey portal | 25 |
| Clery Act compliance calendar/policy | Internal policy documenting the annual reporting timeline and the responsible party | 26 |
| Campus website screenshot/URL | Evidence ASR is posted and accessible to the public | 27 |
| Notification records to students/employees | Email or LMS notification confirming distribution of the ASR | |
| Admissions/prospective student materials | Catalog excerpt, admissions packet, student handbook or website page referencing the ASR | 29 |
| CSA training records | Sign-in sheets or training materials for Campus Security Authorities | 30 |

## Conclusion

## Summary of Institutional Progress

Little Big Horn College experienced a disruption in operations beginning before the Regular Accreditation visit in 2024. The institution has been through numerous changes in administration personnel and has had a change in Board of Trustees composition since then, with the BOT members doubling in size.

In January of 2026, there was a change in six Board of Trustees positions due to Crow Tribal Elections in November of 2025. The result of these changes has made a significant positive impact on the progress of the institution relating to the BOT policy and procedures manual, as well as the other required documents that are needed to meet accreditation requirements.

The suspension of the President in February of 2026 and appointment of the Interim President have resulted in a progressive relationship between the Interim President and LBHC Board of Trustees. Working together has been a key component of identifying and meeting goals moving forward for the institution. Board members have been implementing new ideas and updating policy and procedure to meet the demands of a changing landscape in higher education, especially within Tribal Colleges and Universities. The students of LBHC will continue to be the priority as the relationships strengthen between administration and Board of Trustees while ensuring the requirements of accreditation are met and followed to strengthen the institution.

### Ongoing Monitoring and Sustainability

Little Big Horn College has put in place an updated Board Manual, approved by the board, and will be reviewed annually. A compliance calendar will be in place by the Accreditation Liaison Officer and shared with the accreditation team as well as with the Board of Trustees regarding the upcoming deadlines for reporting. Employee and faculty evaluations will be completed annually on April 1, annually. LBHC has submitted an audit calendar to the Department of Education, and this will be used as an audit timeline for incomplete previous fiscal years in an effort to get back into compliance with audit standards. The Annual Security Report (ASR) is completed and will be reviewed by the Security team annually. They will update reports in this document annually, and this document will be posted on the LBHC website annually when available.

- Annual Board governance policy review: [Board of Trustees, annually]
- Annual staffing sufficiency review: [Supervisors, annually]
- Clery Act annual reporting cycle: [Annually/Dean of Administration; Dean of Students]
- Financial audit calendar: [President, CFO, CPA, Auditors/Quarterly]