<u>"Pawnee Nation College: A Candidate for Accreditation"</u>

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A Community Governance Project Submitted in Partial Fulfillment
of the Requirements for the Degree of

MASTER OF ARTS
in the Faculty of Human and Social Development

We accept this community governance project as conforming
to the standard required.

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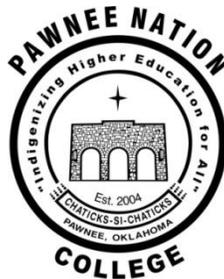
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<u>Acknowledgements</u>

I would like to thank the Creator for the blessing of life. My journey into the Indigenous Governance program would not have happened without the initial mentorship of Robert Proudfoot, who will undoubtedly remain the most significant influence throughout my life. I would also like to thank my grandmother, Florence Goodfox, who has hosted me during this project, as well as her continued lessons about Pawnee culture. In addition, I would like to thank all of the staff and faculty at the Pawnee Nation College and my academic supervisor, Jeff Corntassel, for his continued support.

Community Governance Project

I have previously worked with tribal colleges while employed with the American Indian College Fund and reached out to the Pawnee Nation College (PNC) for my community governance project because I knew they had not yet applied for accreditation. While at the Fund, I became aware of the numerous benefits the PNC was missing because of not having received accreditation, which include a strong reputation as a respected higher education institution, scholarships for students, access to financial aid funding for students, and eligibility for many grants and programs for accredited tribal colleges and universities. I had also heard from the community that the college needed support and felt that I could offer my skill set and knowledge, especially after just finishing my coursework in the Indigenous Governance (IGOV) program at the University of Victoria. In this case, *community* is defined as Pawnee tribal members, students who are members of other tribes and residents of the City of Pawnee who are non-Native.

A significant portion of the IGOV program focused on self-determination, privileging indigenous knowledge and how to conduct indigenous research. Once I arrived at the college, I realized that the indigenous-centered concepts that were taught in the classroom felt like lessons that exist millions of miles away from how the college was actually functioning. In many ways, the college seems to struggle with basic functioning, which makes it difficult to discuss theoretical concepts about operating a truly indigenous-centered college.

At the time, the staff was concerned about receiving approval for a one year continuance, which is the only grant supporting the college. Funding continued to be a major concern. The relationship between the Pawnee Nation and the college seemed strained and lacking in constructive dialogue. Other barriers included: there were only 38 students enrolled at the end of the spring semester, contracted employees were rarely paid on time and expectations about their roles were confusing, a faculty member became aggressive in their behavior towards my ideas, and general staff and faculty accountability seemed to be lacking.

These barriers were immediately apparent and I began to think about how I can help, despite my inclination to want to work on *indigenizing higher education* (PNC's tag line), which sounded like a worthy project to me. I quickly learned that without basic needs being met at the college, it would be challenging to have conversations about college values, the need for community dialogue and response to community needs, and dialogue about the overall governing structure. Without basic operational needs being met, it is challenging to create a space for these broader visionary-led conversations.

Initially, I was charged with assisting Pawnee Nation College with creating a guide for applying with accreditation with the higher learning commission. One week

prior to my arrival, the Board of Trustees for the college decided to prioritize fundraising instead of accreditation. This is understandable since there is currently only one grant covering 99% of the financial needs of PNC with a nominal fee being collected through tuition revenue, due to sharing ½ of this revenue with Bacone College. This grant is the Native American Career and Technical Education Program (NACTEP), which was initially a 5-year grant, but with a significant amount of carry over budget and a need to continue this source of funding, the federal grant administrator later approved both the carry over budget and a continuance for 1 more year. However, the financial uncertainty of the PNC was a concern expressed by most faculty and staff, as well as students. As a result of recognizing the more imminent issues at the PNC, I focused on the immediate needs of the college that were presented after questioning how the college planned to meet some of the accreditation criteria that also related to improving basic functioning and knowledge at the PNC. I also worked on becoming familiar with the history and current daily functions of the PNC.

Community Governance Project Activities

Activities I did while at the PNC included the following:

- a campus tour
- attended the Native Americans in Philanthropy meeting
- created a PNC financial development plan highlighting immediate action that needs to be taken
- attended weekly staff meetings
- received information from PNC staff about the previous failed attempt to apply for accreditation
- provided information about internal revenue service tax exempt organization tax filing requirements
- explained tax liability concerns as a nonprofit that has unfiled taxes
- identified the National Endowment for the Humanities – Humanities Initiatives at Tribal Colleges and Universities grant
- attended a finance committee meeting
- confirmed with the Higher Learning Commission (HLC) that the PNC must re-start the accreditation process over from the beginning after previous failed attempt
- confirmed with HLC that the PNC will be charged the full rate for applying for accreditation and will no longer be offered a discount
- identified current HLC accreditation criteria
- met with Tribal Planner/Division Director, Ted Moore to get access to Administration for Native Americans-Social and Economic Development Strategies (ANA-SEDS) grant that includes the PNC
- reviewed ANA-SEDS grant and determined the PNC has minimal grant objectives and no funding connected to this grant

- researched budget training with OK Center for Nonprofits to the Director of Admissions
- created a budget for applying for accreditation
- met with Finance Director/Division Director, Phil Ellis, and Executive Director, Dawna Hare, to discuss what is included in indirect costs and build stronger relationship with Pawnee Nation (PN) staff
- created an accreditation timeline based on HLC timeframes
- attended PNC Fundraiser Kick-off event
- traveled to the Institute of American Indian Arts to meet with Academic Dean, Dr. Ann Filemyr, Chair Indigenous Liberal Studies, Stephen Wall, Academic Outreach Coordinator, Diane Reyna
- created power point presentation for Community Gathering
- created flyer for Community Gathering, marketed and advertised Community Gathering event
- created event planning forms for each staff related to Community Gathering
- facilitated pre-planning meeting
- co-facilitated Community Gathering
- facilitated one accreditation committee meeting
- created survey to track community recommendations
- presented a Pawnee City Council meeting, presented at Pawnee Business Council meeting
- tracked and presented survey results
- shared information for economic sustainability class with faculty and attempted to work with each department included in indirect cost rate
- researched request for proposals for audit services
- shared board responsibilities in by-laws with the PNC president
- attended Nasharo Council (Chiefs Council) meeting

Accreditation

Receiving accreditation from the Higher Learning Commission (HLC) has been a long term vision for the PNC. As previously mentioned, I was projected to help with re-submitting the Preliminary Information Form (PIF) as a component of the community governance project. In July of 2011, the President at the time, Dr. Todd Fuller, received notification from HLC denying an on-site visit due to insufficient evidence to warrant an on-site visit based on the previously submitted PIF. The letter indicates that if PNC decides to re-apply, they will only need to pay a $1,000 fee rather than the $5,000 PIF submission fee. The letter also indicates that there are new eligibility requirements if PNC chooses to pursue eligibility.

The summary analysis provided by the PIF reviewers representing HLC, a variety of concerns were expressed-

- reading it (the PIF) was "needlessly tedious"
- there were no labels for appendix items
- there was an emphasis on approved programs, but no date for implementation
- full curricula in catalog is misleading
- further explanation needed on sustainability plans
- clarification is needed on the relationship with Bacone College
- a lack of evidence for eight of twelve requirements

Given these list of recommendations, as the PNC moves forward with the accreditation process, it is imperative to designate significant financial and professional resources towards the accreditation process, including qualified and knowledgeable staff. PNC staff who were here during the submission of the PIF believe that part of the problem was the previous President who did not work in collaboration with any other staff members on the submission. PNC staff were largely uninvolved with the original PIF submission, reducing their access to knowledge of the process and familiarity with criteria. The failed PIF submission undoubtedly wasted financial resources (staff time, fees) and may have made an impression of unpreparedness to the HLC. A second attempt should involve a new strategy with the required expertise leading the effort.

One of my first tasks was to establish professional contact with HLC. I contacted Lil Nakutis, Process Administrator, Accreditation Services for HLC. Lil stated that if PNC planned to re-submit after September 15, 2012, the fees would not be reduced to the previously quoted $1,000 and would instead revert to the normal fee of $5,000. The college had previously been given a financial break. I shared this news with the staff and began to review the current state of progress towards applying for accreditation. Members of the staff felt responsible for not meeting the September 15th deadline at a reduced rate, but I shared that the PNC is not ready to re-submit the PIF. Also, the new requirements related to documented proof attached with the PIF make re-submission by September 15th impossible.

Earlier in the year, the PNC did have plans to re-submit the PIF before the board told staff to no longer continue working on it. Prior to notice from the board to discontinue these activities, the PNC acquired a control sheet that was created by the College of the Muscogee Nation. The control sheet was used to organize 13 staff members and their responsibilities to submit final drafts related to each criterion. The PNC used this document to create their own control sheet in January 2012 with plans to have criteria met by May 1. There were 9 PNC staff members assigned on the control sheet.

One method to understand previous errors with submitting the PIF is to understand why the control sheet did not work. Granted, the board decided not to focus on accreditation and instead focus on fundraising efforts, but there were early deadlines in February that were seemingly not met. Some of the differences between

the two institutions include staff size and the information needed from staff. For example, College of the Muscogee Nation broke down the criteria into smaller segments based on specific details of criteria, whereas PNC assigned entire criteria points to staff members. When you consider that criteria includes overarching goals, such as demonstrating "financial capacity" it seems daunting for one or two staff to be responsible for these complex expectations on top of their regular duties and assignments.

It is especially challenging when staff are assigned criteria that may be completely beyond normal job functions. If this strategy is to be used it requires a thorough explanation of why the process and work are important for staff buy-in and understanding. Currently, there are staff members who have expressed that working on the accreditation process is above their current skill level.

Staff members also feel that the board does not support their desired intention to ultimately seek accreditation. I can understand why the board would not support formally applying for accreditation at this time due to higher priorities, such as improving overall functioning and greatly increasing fundraising efforts, but the confusion lies in not knowing whether or not the board wants to seek accreditation in the future. I believe that staff thinks the board wants to seek accreditation in the future, so they do keep this in mind when working on current activities. It may be helpful to have a board directive that clearly articulates the future plan for applying for accreditation, if there should be one and the reasons why the board is taking this stance. Without board support, the staff seem at a loss for what can be done in the interim. It also deflates their motivation to work on accreditation and to plan on the future. An overall message from the board needs to be shared with the PNC staff to better understand the future direction of the college.

As long as PNC staff believe applying for accreditation is a goal, they will continue to keep the criteria discussions going, as well as accreditation committee meetings, which occur every two weeks. It is unclear to me exactly who the lead is for these meetings and without an agenda or a strong leader, the meetings continue to linger in repetitive discussions that lower staff morale.

Accountability is a huge part of this process and having leaders who are able to hold staff to account when deadlines are not met or when work is inferior is important. Again, a review of why the control sheet did not previously work would be helpful for the staff to have an honest conversation together. There is an accreditation committee and Randa Shemwell is the lead for this committee. However, since Ms. Shemwell is the Director of Student Affairs, she has no authority over members of the accreditation committee, nor do any current staff members have authority over other staff members. Dr. Bohanon maintains 100% of the power to hold all staff accountable, despite having leads for committees. It would be helpful to see power sharing on the committee level

occur to allow for decisions to be made and accountability to be shared, especially when the President is not available.

A process of designating a lead for the accreditation committee, reviewing this person's functions and power to exercise the decisions, clear understanding of who is on the committee and the purpose of it are essential to improving the situation. I have recommended to the accreditation committee that the PNC consider hiring a person who is trained as an evaluator for HLC to be recruited and hired for this type of position.

The accreditation process is incredibly complex and hiring a person who is intimately involved with the criteria, such as a paid evaluator for HLC, would be an extremely beneficial asset to the college. Other reasons to support this are:

- an already failed attempt at applying
- a failed effort to use a control sheet
- repetitious meetings that lack strong leadership
- low staff morale around working on accreditation
- the need for a very specific and highly skilled individual experienced with accreditation, which is not currently present at the PNC
- creation of a full time position to work on accreditation (There are required periods of study that must be devoted to the accreditation process by HLC (self-study) that warrant this amount of work to be a full time position instead of an added responsibility to a current staff member).

HLC has updated the accreditation process since the PNC first submitted the PIF. Accreditation standards will continue to be raised, especially since the U.S. government is becoming more involved in the process, instead of what has previously occurred, which was to give more decision making liberties to gatekeeper accreditation institutions. Part of the reasoning for this is the concern about Title IV Financial Aid Funding becoming a budgetary focus and arguments made that little to no return is made on student loans. There is strong speculation that in the future the U.S. government will have sole control over the accreditation process, no doubt increasing the expectations of their applicants and those institutions with current status/candidacy.

The latest information from HLC has 19 eligibility requirements and 22 related eligibility requirements required as preliminary evidence. To better understand this process, I created a timeline (attached separately to this report) detailing the application steps. I also combined these two categories (preliminary evidence for eligibility requirements and eligibility requirements) because they are relatable to each other as timelines are planned.

For example, eligibility requirement number 1 is about jurisdiction of the commission and preliminary evidence for eligibility requirement number 2 is related to this topic. Instead of viewing them separately, I combined all relatable requirements that shared strong similarities with each other. Below is a list of these combinations to aide in long term planning and understanding of this process.

22 Documented *Preliminary Evidence* for Eligibility Requirements

To clarify, PNC must present initial evidence that it meets these requirements before a pre-application interview is scheduled with HLC through the 22 documented evidences of preliminary evidence. It is important to realize the letter to be sent for a pre-application interview must show documentation for all 22 pieces of required preliminary evidence.

19 Documented Eligibility Requirements

Before being granted candidate status, all 19 eligibility requirements must be met. Through the submission of the preliminary information form (PIF) PNC must present full evidence that it meets the 19 eligibility requirements before a site visit for candidacy would be scheduled. This is a different process than the last time PNC previously submitted the PIF because the level of documented proof is higher and more complex.

The list of related preliminary evidence and eligibility requirements is below. Please note: the numbers relate to the numbered list HLC provides that separates these two categories, explaining why the numbers are not always sequential.

Eligibility Requirement

1. **Jurisdiction of the Commission**
   The institution falls within the Commission's jurisdiction as defined in the Commission's Bylaws (Article III). The Commission extends accreditation and candidacy for accreditation to higher education institutions that are 1) incorporated in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming, or operating under federal authority within these states, and 2) have substantial presence, as defined in Commission policy, within these states.

Preliminary Evidence for Eligibility Requirements
Jurisdiction of the Commission

2. Documentation attesting to the incorporation of the institution in one of the 19 states or sovereign nations within the HLC region. (If the institution intends to seek

accreditation for a multi-corporate structure it must seek accreditation as a system and provide information about all corporations included in the system.)

Eligibility Requirement

Institutional Data
There is no eligibility requirement that relates to institutional data.

Preliminary Evidence for Eligibility Requirements
Institutional Data

1. Basic institutional data, including (a) a list of all locations, including main and branch campuses and additional locations; (b) all degree and certificate programs; (c) all programs offered by distance or correspondence education (i.e. wherein 50% or more of the program is offered in any distance or correspondence modality); (d) enrollments in all degree and certificate programs by degree, certificate, location, and mode of delivery.

Eligibility Requirement

2. **Legal Status**
   The institution is appropriately authorized in each of the states, sovereign nations, or jurisdictions in which it operates to award degrees, offer educational programs, or conduct activities as an institution of higher education. At least one of these jurisdictions must be in the HLC region.

Preliminary Evidence for Eligibility Requirements
Jurisdiction of the Commission

3. Documentation demonstrating substantial presence in the 19 states or sovereign nations within the HLC region.

4. Documentation attesting to legal status to operate as an institution offering higher learning in one of the states or sovereign nations within the HLC region (may overlap with documentation in #2 above) and evidence of state authorization in good standing to offer higher learning in any other state in which it is required by state law or regulation to be authorized. (The institution must disclose any state action to suspend, limit or terminate the corporate status or higher education authorization of the institution or any related entity within the previous 5 years.)

5. A clear and complete description of the relationship between the institution and any corporate parent or other related legal entity to which the institution is subject.

7. Articles of incorporation or charter and bylaws (or operating agreement) of the institution, any parent organization or related corporate entities.

11. Description of the relationship with any parent organization or related entities and organization chart that depicts the relationship.

Eligibility Requirement

3. Governing Board
The institution has an independent governing board that possesses and exercises the necessary legal power to establish and review the basic policies that govern the institution.

Preliminary Evidence for Eligibility Requirements
Governing Board

6. A list of governing board members (or managers for LLCs) for all boards in the corporate structure, the profiles of the board members, and disclosure information regarding any ownership interest in the college or related entities, familial relationship with other board members or senior administration at the institution or any related entity, or contractual relationships with the institution or any related entity.

8. Letter from the governing board confirming its intention to seek affiliation and a copy of the minutes from the Board meeting in which the Board approved the seeking of accreditation.

Eligibility Requirement

4. Stability
The institution demonstrates a history of stable operations and consistent control during the two years preceding the submission of the PIF.

Preliminary Evidence for Eligibility Requirements
Stability

There is no preliminary evidence for eligibility requirement that relates to stability.

Eligibility Requirement

5. **Mission Statement**
   The institution has a statement of mission approved by its governing board and appropriate for a degree-granting institution of higher education. The mission defines the nature and purpose of the higher learning provided by the institution and the students for whom it is intended.

Preliminary Evidence for Eligibility Requirements
Mission Statement

9. Mission statement; statements of vision and values if the institution has them.

Eligibility Requirement

6. **Educational Programs**
   The institution has educational programs that are appropriate for an institution of higher education. The Commission may decline to evaluate an institution for status with the Commission if the institution's mission or educational programs fall outside areas in which the Commission has demonstrated expertise or lacks appropriate standards for meaningful review.

   In appropriate proportion, the institution's programs are degree-granting and involve coursework provided by the institution, establishing the institution's commitment to degree-granting higher education.

   The institution has clearly articulated learning goals for its academic programs and has strategies for assessment in place.

   The institution:

   ♦ maintains a minimum requirement for general education for all of its undergraduate programs whether through the traditional distributed curricula (15 semester credits for AAS degrees, 24 for AS or AA degrees, and 30 for bachelor's degrees) or through integrated, embedded, interdisciplinary, or other accepted models that demonstrate a minimum requirement equivalent to the distributed model. Any exceptions are explained and justified.

   ♦ has a program of general education that is grounded in a philosophy or

framework developed by the institution or adopted from an established framework. It imparts common knowledge and intellectual concepts to students and develops skills and attitudes that the institution believes every college-educated person should possess. The institution clearly and publicly articulates the purposes, content and intended learning outcomes of its general education program.

♦   conforms to commonly accepted minimum program length: 60 semester credits for associate's degrees, 120 semester credits for bachelor's degrees, and 30 semester credits beyond the bachelor's for master's degrees. Any exception to these minima must be explained and justified.

♦   meets the federal requirements for credit ascription described in the Commission's Federal Compliance Program.

Preliminary Evidence for Eligibility Requirements
Educational Programs

There is no preliminary evidence for eligibility requirement that relates to educational programs.

Eligibility Requirement

7. Information to the Public
The institution makes public its statements of mission, vision, and values; full descriptions of its program requirements; its requirements for admission both to the institution and to particular programs or majors; its policies on acceptance of transfer credit, including how credit is applied to degree requirements; clear and accurate information on all student costs, including tuition, fees, training and incidentals, and its policy on refunds; its policies regarding good standing, probation, and dismissal; all residency requirements; and grievance and complaint procedures.

The institution portrays clearly and accurately to the public its accreditation status with national, specialized, and professional accreditation agencies as well as with the Higher Learning Commission, including a clear distinction between Candidate or Accredited status and an intention to seek status.

Preliminary Evidence for Eligibility Requirements
Information to the Public

1. Print or electronic catalogue, including other sources through which information described in Eligibility Requirements 4 and 9 is provided.

2. Complete description of the institution's general education program including its philosophy and objectives for general education.

Eligibility Requirement
Financial Capacity

See more in this report regarding Financial Capacity below.

8. **Financial Capacity**
   The institution has the financial base to support its operations and sustain them in the future. It demonstrates a record of responsible fiscal management, including appropriate debt levels.

   The institution:

   ♦ has a prepared budget for the current year and the capacity to compare it with budgets and actual results of previous years; and

   ♦ undergoes external financial audit by a certified public accountant or a public audit agency. For private institutions the audit is annual; <u>for public institutions it is at least every two years.</u> (Institutions under federal control are exempted provided that they have other reliable information to document the institution's fiscal resources and management.)

Preliminary Evidence for Eligibility Requirements
Financial Capacity

17. Audits by a certified public accountant or state audit agency for the last fiscal year (for the interview only, an institution may present a letter from an accountant or bank attesting to the assets of the institution and its financial history). Any consolidated audit must have a separate schedule for the entity seeking accreditation.

18. Comparative budgets for the past fiscal year.

19. Business plan, including projected growth in programs and enrollment, for the next three years.

Eligibility Requirement
Administration

9. **Administration**
The institution has a Chief Executive Officer appointed by its governing board.

The institution has governance and administrative structures that enable it to carry out its operations.

Preliminary Evidence for Eligibility Requirements
Administration

10. Job description and resume of the CEO.

Eligibility Requirement

10. Faculty and Other Academic Personnel
   The institution employs faculty and other academic personnel appropriately qualified and sufficient in number to support its academic programs.

Preliminary Evidence for Eligibility Requirements
Faculty and Other Academic Personnel

16. Outline of the faculty governance structure.

20. Roster of faculty and administrative personnel, with qualifications of individuals, their status (full or part-time, adjunct or independent consultant), department assignment and a list of the courses they typically teach.

Eligibility Requirement

11. Learning Resources
   The institution owns or has secured access to the learning resources and support services necessary to support the learning expected of its students (research laboratories, libraries, performance spaces, clinical practice sites, museum collections, etc.)

Preliminary Evidence for Eligibility Requirements
Learning Resources

21. Inventory of learning resources and student support services.

Eligibility Requirement

12. Student Support Services
  The institution makes available to its students support services appropriate for its mission, such as advising, academic records, financial aid, and placement.

Preliminary Evidence for Eligibility Requirements
Student Support Services

There is no preliminary evidence for eligibility requirement that relates to Student Support Services.

Eligibility Requirement

13. Planning
  The institution demonstrates that it engages in planning with regard to its current and future business and academic operations.

Preliminary Evidence for Eligibility Requirements
Planning

There is no preliminary evidence for eligibility requirement that relates to planning.

Eligibility Requirement

14. Policies and Procedures
  The institution has appropriate policies and procedures for its students, administrators, faculty, and staff.

Preliminary Evidence for Eligibility Requirements
Policies and Procedures

There is no preliminary evidence for eligibility requirement that relates to policies and procedures.

Eligibility Requirement

15. Current Activity
The institution has students enrolled in its degree programs. (To be granted initial accreditation, an institution must have graduated students from at least one degree program.)

Preliminary Evidence for Eligibility Requirements
Current Activity

There is no preliminary evidence for eligibility requirement that relates to current activity.

Eligibility Requirement

16. Integrity of Business and Academic Operations
The institution has no record of inappropriate, unethical, and untruthful dealings with its students, with the business community, or with agencies of government. The institution complies with all legal requirements (in addition to authorization of academic programs) wherever it does business.

Preliminary Evidence for Eligibility Requirements
Integrity of Business and Academic Operations

13. List of all lawsuits, including whistleblower lawsuits, state investigations or prosecutions, or judgments within the last five years involving (a) claims by students, faculty or staff related to the academic quality of the institution, (b) its recruiting or admissions, or (c) its financial aid practices.

Eligibility Requirement

17. Consistency of Description Among Agencies
The institution describes itself consistently to all accrediting and governmental agencies with regard to its mission, programs, governance, and finances.

Preliminary Evidence for Eligibility Requirements
Consistency of Description Among Agencies

There is no preliminary evidence for eligibility requirement that relates to Consistency of Description Among Agencies.

Eligibility Requirement

18. Accreditation Record
The institution has not had its accreditation revoked and has not voluntarily withdrawn under a show-cause order or been under a sanction with another accrediting agency recognized by CHEA or USDE within the five years preceding the initiation of the Eligibility Process.

Preliminary Evidence for Eligibility Requirements
Accreditation Record

12. List of current accreditation relationships and their status, and information regarding any other official interactions with other accreditation organizations in the past five years.

Eligibility Requirement

19. Good Faith and Planning to Achieve Accreditation
The board has authorized the institution to seek affiliation with the Commission and indicated its intention, if affiliated with the Commission, to accept the Obligations of Affiliation.

The institution has a realistic plan for achieving accreditation with the Commission within the period of time set by Commission policy.

- If the institution offers programs that require specialized accreditation or recognition in order for its students to be certified or sit for licensing examinations, it either has the appropriate accreditation or discloses publicly the consequences of the lack thereof. The institution always makes clear to students the distinction between regional and specialized or program accreditation and the relationships between licensure and the various types of accreditation.

- If the institution is predominantly or solely a single-purpose institution in fields that require licensure for practice, it demonstrates that it is also accredited by or is actively in the process of applying to a recognized specialized accrediting agency for each field, if such agency exists.

Preliminary Evidence for Eligibility Requirements
Good Faith & Planning to Achieve Accreditations

22. Plan for achieving accreditation: milestones and dates; maximum 1,000 words.

Costs of Applying for Accreditation

      I created a projected budget to use when applying for accreditation based on current rates and estimated costs for travel. I was instructed by Lil Nakutis at HLC to double the fees for site visits since all costs associated with sending people to the PNC are to be covered, but there is no way to predict the cost of their flights, meal reimbursements, hotels, food, etc. This document is called HLC Accreditation Fees (attached in email with report). The total estimated cost was $55,900 to apply for accreditation if the PNC were to begin based on the rates HLC uses today. If the college plans to apply for accreditation, it would be useful to have this funding available once the process begins. Throughout the accreditation review process the college may be required to repeat a step due to not meeting the requirement. In that case, the fee for repeating the step would need to be paid again. I would not begin the accreditation process until there is a guaranteed source of funding to cover these costs.

Pawnee Business Council

      Dr. Bohanon and I attended the Pawnee Business Council Special Meeting on May 9th, 2012. Dr. Bohanon asked for forgiveness on a $25,000 loan that the college borrowed from the Pawnee Nation to complete building remodeling in 2010. It would be helpful to have board members discuss this with members of the business council to help them understand how important it is to not repay this loan and retain the $25,000. It is generally a good idea to build stronger relationships with each of the business council members since none of them attended the pre-planning meeting for the community gathering or the community gathering itself, despite repeated invitations and encouragement.

Financial Stability -Continued

      As previously mentioned, PNC staff are concerned about proving financial stability for HLC as a requirement and they are generally concerned about the financial stability for the institution. My understanding is that the current carry over budget from the NACTEP grant is approximately $401,000 (currently) with an expected $481,000 to be released in the fall of 2012 for an additional and final year of funding.

The Commission doesn't require an annual appropriation; HLC expects that the institution has a sound financial base and a <u>*consistent*</u> *source of income so as to sustain*

its fiscal viability--along with all the other elements in the financial capacity eligibility requirement. It may be true that the institution cannot operate without the annual appropriation from the tribe and without it the institution won't meet the eligibility requirement. However, HLC doesn't require appropriations; it requires a source of funds. The Commission cannot be used to force an appropriation; the Commission's eligibility requirements may be used to demonstrate that without some source of viable funding--such as an appropriation--the institution won't meet the eligibility requirements.

Further, it's not just having the sources of funding (whatever they are); it's being able to show that such finding is consistent and reliable.

Emailed on 5/23/2012 by Lil Nautis to Deanne Grant

Governing Structure

As a 501c3, the college must consider the role of the Pawnee Nation. The Article of Incorporation details this relationship. Employees from both the nation and the college have expressed desires to separate from each other. I think that the relationship between the two entities has the potential to be strengthened with significant community building. It has not always been easy to get information from the nation, but after developing a rapport with individual employees with the nation, I was able to get information about indirect costs, the ANA grant and helpful advice to improve the college. Both sides feel frustrated with the other, but through a commitment of improving through follow through on actions and listening to each other's perspectives, there is potential for greater communication. Certainly, the collaboration on grant applications is extremely helpful in drafting a competitive application for both entities that should be occurring more frequently.

Fiscal Sponsorship

Since the Pawnee Nation acts as the fiscal sponsor of PNC, clarifying the extent to Pawnee Nation's responsibilities would be helpful. The National Network of Fiscal Sponsors provides great information about best practices that can be found at www.tidescenter.org/nffs

Further research is needed to review how other tribes handle financial management of their nonprofit entities. The Pawnee Nation has another component, the Pawnee Tribal Development Corporation (TDC), but this component is different from the PNC in most capacities. The Pawnee TDC is charged with creating economic development opportunities for the Nation as a corporation, whereas the college is charged with providing educational opportunities as a nonprofit organization. On occasion, the Pawnee TDC and the PNC are compared, but they are almost entirely different in mission, operation and function. A comparison is unfair and the

expectations that the PNC will eventually become more like the Pawnee TDC in terms of finances and autonomy from the nation are shortsighted.

As a nonprofit entity, the PNC should advocate for their fiscal sponsor, the Pawnee Nation to fulfill their responsibilities related to maintaining the fiscal integrity of the college. At a minimum, as a fiscal sponsor for a nonprofit, the Pawnee Nation should ensure there is an annual financial audit that is consistent with the Generally Accepted Accounting Principles (GAAP) and make this available to the public. The Pawnee Nation has an audit, which includes the NACTEP grant, but it does not facilitate an annual audit of any other financial aspect related to the college. This reason and the college's lack of oversight are some of the reasons the PNC has never had an annual audit.

Indirect Costs

The primary grant covering the operations costs of the college are currently being funded through the Native American Career and Technical Education Program (NACTEP) grant. This grant is also known as Oklahoma Native Leadership Initiative (ONLI) internally with both PNC and Pawnee Nation. PNC wanted to learn what indirect costs (IDC) were being charged to this grant by the Pawnee Nation and what services were provided under it. At the time, PNC staff were unable to answer this question.

After meeting with Finance Director, Phil Ellis, and Executive Director, Dawna Hare, we were informed that IDC includes: housekeeping, information technology, financial oversight of the grant, human resources, communications (tribe and contract), building maintenance, and lawn maintenance. The next step was to contact the leads for each of these areas and determine what level of service they provided to PNC.

The U.S. Department of the Interior's National Business Center has approved the IDC rate of 52.54% to be charged by the Pawnee Nation to all grants based upon the total salary of all staff/faculty who were listed in the grant application. To receive approval for this rate, the Pawnee Nation had to financially demonstrate how this rate is necessary in order to fulfill operations.

> For example, if a total of $120,000 is charged for salaries connected to a grant, then you multiple .5254% = $63,048 in IDC collected by the nation.

The Pawnee Nation will continue to seek IDC approval on a year by year basis, with the likelihood of this rate increasing. Below is an outline of indirect cost services provided by Pawnee Nation.

Human Resources
PNC Indirect Costs

Contact Person:

Shelby Exum, BS
Human Resources Director
Office of Human Resources
Pawnee Nation of Oklahoma
Office: (918) 762-3621 Ext. 52
Cellular: (918) 399-5007
Fax: (918) 762-1051
Email: hrspecialist@pawneenation.org

Human Resources

The Pawnee Nation's Office of Human Resources is responsible for all aspects of personnel management. This scope of work includes, but is not limited to, advertising vacant positions, recruiting highly qualified and skilled applicants, managing employee relations, administering benefit plans, developing and deploying policies and procedures, maintaining personnel records, monitoring compliance with applicable federal, state, and tribal laws, establishing wage and compensation rates, and providing relevant training. Pawnee Nation's H.R. department recruits staff only for PNC, not faculty.

The previous president of PNC created employee policies that are still used in the faculty handbook. These policies were not reviewed by the H.R. department at Pawnee Nation and this creates a variety of problems. First, the previous president was not an H.R. specialist familiar with current laws and policies related to employee rights. Shelby expressed deep concern about the differences between the way the college operates and the Pawnee Nation human resources policies. The other Pawnee Nation component, the Pawnee TDC, have their own H.R. department, but again the Pawnee TDC is a very different operation than the PNC.

PNC employees have expressed confusion as to what employee policies to follow- the Pawnee Nation's or the PNC's faculty handbook. Shelby was not consulted about these policies. Although the Board of Trustees for the PNC are able to approve an employee policy, it is not clear if the Board fully understands H.R. law when approving H.R. related policies for PNC faculty and staff to follow. Shelby has problems with PNC faculty who have used either manual (the PNC faculty handbook or PN employee manual) to argue a point. As employees of the PNC, which is technically under the greater power and authority of the Pawnee Nation, it is difficult for Shelby to know which policy to follow.

This is more than a technicality and serious consideration and time needs to be put into creating a new PNC faculty handbook that is accepted by the PN H.R. department. There is a possibility for legal recourse, especially when considering disgruntled employees who have been let go, the lack of H.R. training and knowledge

available at the PNC and major areas of confusion about what between the PNC staff and the PN H.R. department.

Tribal Operations
PNC Indirect Costs

Contacts:

Louise Stevens
Administrative Assistant
lstevens@pawneenation.org
918-762-2273

Jimmy Jestes
Tribal Operations Manager/Division Director
jjestes@pawneenation.org
918-762-2273

Tribal Operations includes housekeeping, grounds maintenance, building maintenance and receiving.

Housekeeping

Housekeepers are assigned buildings for which they are responsible for cleaning. This service does not include dishes in the sink or cleaning the fridge.

Building Maintenance

Work orders are submitted for building maintenance. The work order is submitted then printed out and given to Jimmy Jestes who then assigns it to an individual. They also read the meter for the water system. This would also include pest/insect control.

Grounds Maintenance

Grounds maintenance staff regularly monitor the grounds and have a schedule. They are responsible for mowing the grass, weed eating, brush hogging, and blowing the debris off the sidewalk.

Administrative Assistant

Tribal Operations has an administrative assistant that is responsible for maintaining all building rentals, all records, receiving inventory, and packages, inputting P.O.'s, receiving and greeting clientele, answering phones, filing, billing for the Pawnee Nation water system (building water only/sinks/toilets). **Communications**

PNC Indirect Costs

Contact Person:

Toni Hill
Communications Manager
918-762-3621 ext. 25
918-399-1344 (cell)
thill@pawneenation.org

Communications Support

The scope of work listed on college contract supports the ONLI grant objectives and is in contrast to my job description with Pawnee Nation which does not include Pawnee Nation College (PNC).

Since the College only pays approximately 8% into IDC compared to the approximately 52.54% paid by the other departments within Pawnee Nation. Therefore, the support base supplied by my office to the College will be lower than what is offered to the other Pawnee Nation departments.

Any functions provided by communications to the College outside of a contract (as a Pawnee Nation employee) is limited to taking photographs during office hours based on schedule availability and placing limited articles **written by PNC staff** in the *Chaticks si Chaticks* as space allows*.

Basically, to promote the college in marketing, advertising, newspaper articles, etc. a contracted position is necessary.

IT Support
PNC Indirect Costs

I was unable to research what types of services were included with IT support under indirect costs. However, Phil Ellis is the point of contact with the nation to better understand the extent of IT support.

Costs Paid by the Tribe

 The Pawnee Nation pays for electricity, water, unexpected building emergencies related to PNC. The nation also has agreed to the 8% indirect cost rate required by the NACTEP grant. Therefore, the difference between the rates (52.54% the nation requires) is being covered by the nation.

Taxes & Audits

Employer Identification Number: 83-0459992.
PNC was approved for tax exempt status as a 501c3 on September 22, 2006 by the IRS. The Pawnee Business Council approved PNC's Articles of Incorporation on March 8, 2006. Due to not paying taxes since approximately 2009, it is unclear as to whether or not the PNC has retained its nonprofit status.

IRS Requirements for Exempt Organizations:

To be allowed to collect tax-deductible contributions an organization is required to 1) file annual exempt organization returns on income and expenses and 2) may also be required to file other returns and pay employment taxes.

Exempt organizations (E.O) are responsible for federal income tax withholding, social security, medicare taxes and possibly federal unemployment tax.

If an organization fails to comply, the Employment Taxes and the Trust Fund Recovery Penalty (TFRP) may investigate. The amount of the penalty is equal to the unpaid balance of the trust fund tax, which includes unpaid income taxes withheld, plus the employee's portion of the withheld FICA taxes. They can file a federal tax lien or take levy or seizure action against an individual representative of the organization who is found responsible for non payment.

In-Kind Donations & Services

It would be helpful to have a tracking system for in-kind services and donations, such as my volunteer time. This type of tracking is useful in demonstrating other financial commitments for grant applications.

Community Gathering

The meeting goal was to allow the community to participate in a community-wide discussion about the future direction of Pawnee Nation College and how the PNC can work to address the community needs on Thursday, May 18th. The college began in 2004, after the Pawnee Business Council passed an act of resolution supporting the creation of a college. The plan is to discuss, as a community, ways the college can grow in a positive way to address community needs. It was not designed for individual, nor personal grievances with the college.

Approximately, 25 community members attending the Community Gathering with only 5/25 being Pawnee Nation tribal members, which seemed disappointing and revealing of not much tribal support. This is an indicator that the PNC needs to work on building relationships with individual tribal members. We hosted a pre-planning meeting

the week prior where approximately 12 people attended, with approximately six tribal members attending. We presented a power point presentation at the event itself to address some of the concerns brought up at the pre-planning meeting about not knowing basic stats about the college, not knowing who worked at the college, etc. The pre-planning meeting was used as a platform to test ideas to present to the community and responses for our questions to be asked at the Community Gathering. The questions and responses are listed below.

These were comments made by people who attended the pre-planning meeting for the community gathering, as well as comments made at the event itself. All of these comments were made by the community. Therefore, I acted as a facilitator for both meetings. PNC staff/faculty were present, but primarily offered information to questions that I was unable to answer. To simplify the information, we created four potential categories: Publicity & Marketing, Fundraising, Training, Networking, and Increased Accountability.

Q1. What are the general perceptions about the current situation at PNC?

Publicity & Marketing

-Drastically increase public awareness (faculty, statistics, meetings)
-Explain current accreditation status (public perception is that PNC does not offer accredited courses)
-Get PNC signage (hwy/city of Pawnee)
-Promote success stories (both students and staff/faculty)

Fundraising

-Apply for more funding as a 501c3
-Obtain financial stability
-Get secured funding for Pawnee language program (not temp. grant)
-More PNC branding-college flag, t-shirts
-Sell bricks to get small amount of funding
-Donation box at the Field Museum-Pawnee earth lodge exhibit

Training

-Casino related job training
-Staff training for local tribal employees
-Create tribal police training program
-Provide training for Pawnee tribal employees
-Train ECE daycare workers
-Coordinate CASA training
-ICWA training

<u>Networking</u>

-Increase high school recruitment and connection
-Have PNC transition coordinators at middle school and high school level
-Create jobs/college town atmosphere/increase local businesses
-Create health programs for Pawnee located I.H.S.
-"Bridge" community divide (literally referring to the bridge separating reserve and city)

<u>Increased Accountability</u>

-Improve level of professionalism/management/leadership
-Follow up when community reaches out (people offer ideas, to teach classes, etc. and PNC does not follow up)
-Reflect Indian controlled education (shed boarding school)

<u>Other</u>

-Create family savings for college (IDA, OK 529 Plan)
-Capitalize on Pawnee history, tribal archives, museums
-Host art/film/music festival
-Review workforce needs with employment commission
-Host tribal health fair
-IHS clinic partnership
-Encourage internships with local businesses (academic credit/paid)
-Explore unused space, i.e. old hospital as medical training facility (dialysis/orthopedics/certified nursing assistant training)
-Create concurrent preparatory courses for credit

I wanted to talk about the set of values that should be used at the college as the foundation because it was unclear to me what those values were. I have heard that the nation has a video for new employees explaining the values for Pawnee Nation employees, but it would be nice to have the college articulate their own. As a tribal college, it may be helpful to clarify why a tribal college is necessary in Pawnee and how indigenous education is an act of resurgence against colonization. At this community meeting, I asked the question below and found it difficult to explain the question in a way that people would understand.

Instead, I received responses that were specific values or I received comments about the need for students to be able to function "other there" in the "real world." This question is challenging and also very important, so I think further discussions about this topic would be very helpful. It would be most beneficial to have this conversation in another community gathering because it really articulates the foundation of an indigenous institution.

Q2. What set of values should act as the foundation for the college?
        -Is it important to have Pawnee values incorporated into curriculum?
        -Should the American Indian Studies program be centered on Pawnee values?

        During the pre-planning meeting, several people commented that community members do not understand what accreditation means. During the power point presentation, I presented a basic understanding of the accreditation process, the total cost, and benefits gained (focusing on primarily financial benefits). Overwhelmingly, the group supported the college's effort to seek accreditation and also appreciated clarifying that the college is now currently accredited through Bacone College.

Q3. Should the college pursue accreditation with the higher learning commission?
        -Are there other ways the college can serve the community?
        -Are people familiar with the benefits of accreditation and the time frame/cost involved?
        -Are people familiar with the benefits of remaining a partner with accredited institutions, such as Bacone College, and instead build a new addition to the college that focuses more on the nonprofit side, such as cultural arts programming (language, art, Nebraska seed saving, work with elders, research)?

        I think there are several community members who are eagerly waiting to hear what action the PNC will take from these two meetings. It is important for the college to decide where to focus their efforts and consider having a follow up meeting in the near future to continue this dialogue with the community.

PNC Survey Results

Survey conducted: May 17th-May 26th

We collected this information on paper format, through the PNC website and facebook. There were 17 people who completed the survey. The survey was organized through survey monkey. Paper surveys can be manually entered into survey monkey through the PNC website link to the survey. Question number 3 was not correctly tracked in survey monkey, skewing the results. In addition, many people simply checked the boxes for question 3 instead of ranking them 1-7.

Username: deannePNC
Password: PNC1

PNC has the basic free service with surveymonkey, which does not include graphs. If PNC would like the information in graph form, a subscription will be necessary.

1. <u>Would you recommend PNC to your friends and family for a 2-year associate's degree in American Indian Studies?</u>

Percentage	Response	Count
93.8%	Yes	15
6.3%	No	1
Skipped question		1

2. How do you think the Pawnee tribe should financially support Pawnee Nation College? (circle all that apply)

Percentage	Response	Count
81.3%	Annual appropriation (guaranteeing financial stability)	13
75%	Waive rent/service fees (IT, HR, financial oversight, communications, lawn maintenance, housekeeping)	12
0%	None of the above; the tribe has no obligation to financially assist the college	0
	Skipped question	1

3) Currently, PNC offers a 2-year associate's degree (accredited by Bacone College) in American Indian Studies. What additional program areas should PNC offer? (rank from 1-7; 1 being the most important)

The responses to this question were incorrectly weighed, which was a question design error, making the responses null. However, written in responses include: criminal justice, language teacher training, computer how to/where to go/how use/food service, law enforcement, and physics.

4) Should PNC apply for accreditation from the Higher Learning Commission (HLC)? (choose one)

Percentage	Response	Count
0%	No, PNC should remain under an accredited partner	0
100%	Yes, PNC should work on becoming accredited	17
Skipped question		0

5. <u>What should the core values at PNC be? (choose one)</u>

<u>Percentage</u>	<u>Response</u>	<u>Count</u>
5.9%	Pawnee values	1
29.4%	Indigenous values (inclusive of all Native values, including Pawnee values)	5
58.8%	Prioritize Pawnee values, but include other indigenous values	10
5.9%	Mainstream/Dominant cultural values (non indigenous)	1

6) Are you satisfied with the services provided by Bacone College (PNC's accredited partner)? (circle one)

11.8%	Yes, I am satisfied with Bacone College (had personal experience)	2
23.5%	No, I am not satisfied with Bacone College (had personal experience)	4

7) Other comments:

Much more public relations/advertising is needed. Keep website current (the fall semester was still listed in February).

The college needs man power and money from Pawnee Nation to make it.

Want to see you succeed!

Need a lot more exposure. Go to schools.

Event Planning

Since I was planning the gathering, I assigned each staff member to a specific task for the event, creating a document for each person detailing their responsibilities and had a follow up meeting. The staff seemed to struggle with organizing for previous events I experienced. One area of concern was the food budget based on overspending

at previous events. I clarified this by starting the event planning with a budget and having only one person in charge of food. Staff later said they liked the structure and may use it again in the future.

Board Participation

There are 9 PNC board members, 6/9 have been serving since inception in 2005, 7/9 are Native American, 7/9 live in Oklahoma (most of whom reside within close proximity of Pawnee). While working on the project at the PNC for 2-months, I have observed active board participation with a couple key board members from my scope of work. Although many board members live in the vicinity, I did not find the participation consistent. This does not mean that board participation is not active with other staff members at PNC. At this time, the bylaws of the PNC explain the responsibilities of the trustees.

Even though, trustee information is available in the bylaws, it may be helpful to discuss term limits, as well, and clarify the board expectations and roles/responsibilities related to their titles. The bylaws state that there is no limit to the number of terms a trustee may serve, but due to many of the current board members serving since 2005; it may be time to have a discussion about recruiting replacements. New board members bring a fresh perspective and energy towards assisting the PNC and recruiting specific skill sets to assist the college in its growth could be very helpful. The board titles include: Chair, Vice Chair, Treasurer, Secretary and Member. The bylaws explain expectations for each position.

One position that is repeatedly discussed at the PNC as a position that needs clarification is the Treasurer on the Board of Trustees. The bylaws state significant responsibilities including,

Section 3.6 (f) cause quarterly financial reports, an annual budget, and an annual audit to be completed and presented to the Board of Trustees and the Pawnee Business Council

To my knowledge PNC has never conducted an annual audit, which is required as a 501c3, demonstrates financial responsibility to donors and is used as

For example, as the Treasurer of PNC, should the person in this position be required to ensure taxes are filed annually, independent audits are conducted, guarantee a checking and balances systems is in place for all PNC accounts, etc.?

It seems that most nonprofit board members have a specific annual fundraising goal required by their nonprofit, demonstrating a commitment to the goals and mission of the organization. PNC has not yet determined whether this approach will be implemented as an expectation, but a financial contribution or fundraising efforts would undoubtedly benefit the college. Given the academic and professional credentials of the

board members, there are likely to be many networking opportunities that could benefit the college, both financial and other. Board President, Dr. James Riding In, participated in the PNC fundraising kick-off event in April by offering donations from his recent book to the college. This is one example of how board members, especially those who are publishing, can make a financial contribution.

Other board activity that I have observed from my scope of activity include: Elizabeth Blackowl advocating for PNC support at a tribal council meeting and Gwen Shunatona attending fundraising committee meetings, the pre-planning meeting for the Community Gathering and co-facilitating the Community Gathering. Gwen Shunatona and Elizabeth Blackowl also advocated for the college at the Nasharo Chiefs Council meeting on June 2nd. Gwen Shunatona was the only board member to attend the Community Gathering, which was a great opportunity for board members to hear directly from the community about PNC, as well as meet board members.

Institute of American Indian Arts Site Visit

I had previously met with Stephen Wall at the University of Victoria and he invited me to come to Santa Fe for help with this project. Fortunately, I was able to see this offer through and gladly met with him and staff who had worked on the original submission for accreditation. They had many great ideas and recommendations for the college that I shared with staff when I returned. One of the greatest assets the college has is building a networking with other tribal college and universities (TCU) who are able to help. They have already been down this road and I have found they are full of information. Previously, a staff member (who is no longer employed with the college) had visited IAIA on a similar visit. I did not realize this until I got there and noted that some of the IAIA staff were concerned about the progress the college had made since the previous visit.

Date: 4/26/12
Attendees:
Deanne Grant, PNC Graduate Research Intern
Stephen Wall, J.D, Chair Indigenous Liberal Studies
Dr. Ann Filemyr, Academic Dean
Diane Reyna, Academic Outreach Coordinator

The following are primary notes from IAIA staff members regarding the direction of the PNC. IAIA is a respected tribal college that received accreditation in the 70s, so I found it helpful to meet with them and gather their feedback for the college.

1) There is currently a shift occurring that will raise the standards of accreditation. The U.S. government wants more control over student loans, which heavily influences accreditation standards. PNC can expect more challenges than other TCU's expected going through this process. One benefit is that many TCU's have

already advocated indigenous rights to control higher education to HLC. HLC understands cultural revitalization, language revitalization programs, having cultural experts (not PhDs) on staff, etc.

2) Examine whether or not applying for accreditation makes sense at this time. Critical questions-

    Why should the Pawnee Nation have its own college?
    Do staff seem invested in helping with the accreditation process?
    How is the college addressing current tribal needs?
    Is PNC a place for cultural revitalization?
    Do newly accredited TCU's receive land grant status automatically?
    Do people know it is not an oppressive roadblock, but capacity building?
    Does the President support accreditation?

    If PNC determines to move forward with the accreditation application, it is crucial to: have an active board supporting and working on pieces of the application, have Pawnee nation support for accreditation, have community support for applying. All of these groups must know the answers to the above questions with information about why AI/AN students succeed at TCU's vs. mainstream, how TCU's economically support communities, and other benefits. Most importantly, accreditation opens up access for students to receive title IV financial aid funding (pell grants, loans, etc.), money goes directly to PNC.

    AIHEC Website-

    By 1975 the first version of the Tribally Controlled Community College Act was introduced as Senate Bill 1017. The first U.S. Senate hearing, October 1975, established a congressional record and history for future legislation and was signed into law as the first Tribally Controlled Community College Assistance Act, December 1978, by President Jimmy Carter. The key justification for the law was: (1) geographic isolation of the tribes, (2) access to mainstream higher education opportunities lacking for tribal populations, (3) cultural disparities with mainstream or non-Indian society, (4) student success more likely when education offered locally and in community setting, (5) local control in providing higher education to tribal members, and (6) no local tax or state funding available to the schools. The law remains an authorization for the schools under the Department of Interior, Bureau of Indian Affairs.

3) Consider hiring an advocate to communicate the above message. Sometimes it is helpful to have an outside person do this who is experienced in the field of accreditation to explain the benefits. Also, consider contracting someone affiliated with the HLC criteria (consultant & evaluator) to give guidance to begin.

Dr. Maggie George, President of Diné College Consultant & Evaluator with the Higher Learning Commission

Dr. Cynthia Lindquist, President, Cankdeska Cikana Community College, currently sits on the Board of Trustees for the Higher Learning Commission

4) Consider a community gathering for people to voice their opinions about PNC.

   How has PNC incorporated community feedback into its mission?
   Does the community want a college, Pawnee cultural center, job training center, a combination?
   Does Pawnee need to create a new image (logo, mission, colors, Pawnee name)?
   How is PNC accountable to the community?
   How are PNC Pawnee centered (values, art, beliefs, etc.)? How is the Pawnee community the foundation of the college?

5) Identify members of the Pawnee Nation who can return to help with accreditation or re-focus of PNC.

   Many TCUs recruit members of their tribe to return to aid on specific projects. Also consider educators within the K-12 training, others who have excellent organization skills, people who understand education as a system, not just a classroom educator

6) Consider strengthening the American Indian Studies program. IAIA shared curriculum development, outlining the history of their Indigenous Liberal Studies program for ideas.

<u>Recommendations</u>

   I have listed recommendations previously mentioned in this report below, as requested by the committee, to help the PNC staff easily access this information. These recommendations are based upon my observations over the two month period I was working with the college. During my defense, the committee requested that all recommendations throughout the document be presented together. Many of these recommendations are based on my observations for improvement, but I am also listed recommendations made by the community and staff members are the Institute for American Indian Arts in Santa Fe. I request that the leadership at the PNC consider these recommendations, as they continue to grow the college into a financially sustainable and culturally relevant higher education institution. There are also members of the community who are seeking change from the PNC in the near future and demonstrating efforts for improvement could continue to improve the relationship between the community and the college.

- Improve the relationship and accountability between the Pawnee Nation and the PNC
- Understand why the control sheet did not work with previous PIF submission and create an alternative plan or adjustments to make it work
- Clarify the board's objective on accreditation and clearly communicate this to staff, including timelines
- Have meetings with a clear leader/facilitator with an agenda that begins/ends on time
- Consider power sharing on the committee level occur to allow for decisions to be made and accountability to be shared, especially when the President is not available
- Consider hiring a person who is trained as an evaluator for HLC to be recruited and hired to assist with accreditation application
- Begin the accreditation process when there is a guaranteed source of funding to cover all costs
- Further research is needed to review how other tribes handle financial management of their nonprofit entities.
- As a nonprofit entity, the PNC should advocate for their fiscal sponsor, the Pawnee Nation to fulfill their responsibilities related to maintaining the fiscal integrity of the college
- As employees of the PNC, which is technically under the greater power and authority of the Pawnee Nation, all staff should follow H.R. policies created by the Pawnee Nation H.R. department and not create their own without professional H.R. consultation and dialogue with the Nation
- Pay taxes on time to maintain nonprofit status

- As a tribal college, it may be helpful to clarify why a tribal college is necessary in Pawnee and how indigenous education is an act of resurgence against colonization
- Respond to the concerns and direction shared by the community at the pre-planning meeting and community gathering
- Pre-plan for events using staff assignments and budgets
- Discuss board term limits and clarify the board expectations and roles/responsibilities related to their titles
- Require board members have a specific annual fundraising goal and higher level of active participation with improving the college