

# NWCCU Evaluation of Institutional Effectiveness (Year 7) Report

Submitted to the Northwest Commission on Colleges and Universities



Little Big Horn College  
Crow Agency, Montana  
August 1, 2024





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## Institutional report certification form

Please use this certification form for all institutional reports (Self-Evaluation, Annual, Mid-Cycle, PRFR, Evaluation of Institutional Effectiveness, Candidacy, Ad-Hoc, or Special)



### Institutional Report Certification Form

On behalf of the Institution, I certify that:

- There was broad participation/review by the campus community in the preparation of this report.
- The Institution remains in compliance with NWCCU Eligibility Requirements.
- The Institution will continue to remain in compliance throughout the duration of the institution's cycle of accreditation.


I understand that information provided in this report may affect the continued Candidacy or Accreditation of my institution. I certify that the information and data provided in the report are true and correct to the best of my knowledge.

Little Bighorn College

(Name of Institution)

Neva Tall Bear

(Name of Chief Executive Officer)



(Signature of Chief Executive Officer)

7/31/2024

(Date)



## Institutional overview

The Crow Tribal Council chartered Little Big Horn College (LBHC) on January 24, 1980. Resolution #80-17 authorized LBHC to operate as the official institution of postsecondary education for the Crow people, with amendments in 1993, 2006, and 2023. The charter expresses the purposes "of establishing, maintaining, and operating educational institutions at the postsecondary level on the Crow Indian Reservation, with education, vocational, and technical programs and curricula leading to degrees and certificates that may be granted by the College."

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

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



The Crow flag

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

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

In 2023-24, the majority of the 300 students enrolled per term are members of the Crow Tribe of Indians and there are 14 full-time faculty (including the trades), 5 adjunct faculty, 54 staff (including 3 temporary positions), and 6 administrators.



## Preface

### a. Brief update on institutional changes since the institution's last report

Note: The Crow Indians of southeastern Montana formally call themselves Apsáalooke (Children of the Large Beaked Bird). This Native name was erroneously translated as People of the Crow and then shortened to simply Crow. Although a mistranslation, Crow people are generally fine being called “Crow”. For this reason, throughout this report the term “Crow” will be used.

**New strategic plan:** In summer 2023, Deborah His Horse Is Thunder facilitated two and a half days with the administration team and key staff where they brainstormed and discussed ideas for the new strategic plan. The 2023-27 strategic plan was approved by the Board of Trustees on Nov 2, 2023. The College created several goals and action plans, which have been used to guide the College. For example, to enhance marketing and communications, LBHC created a PR position who implemented a new platform for marketing the College. Also, the 2023-27 strategic plan has been used to align strategic activities with a new grant with the American Indian College Fund.

### Board of Trustees

1. *Charter and joint action resolution amendments:* A joint action resolution was brought forward by the executive and legislative branches of the Crow tribal government to amend the charter (November 21, 2023) The most significant change was to how the LBHC Board of Trustees holds elections. Elections were previously overseen or held by the College. After the change, this responsibility is now under the secretary of the Crow Tribe.
2. *Elections:* Elections of all 12 seats of the Board of Trustees – representing all districts on the Crow Indian Reservation – were held on December 18, 2023. New Board members were sworn in on January 9, 2024.
3. *Board of Trustees training:* On January 17, 2024, NWCCU president Dr. Sonny Ramaswamy and executive vice president Dr. Selena Grace provided the newly elected Board with virtual training and orientation about the NWCCU accreditation process – especially as to how it applies to LBHC. On April 3, 2024, president Sonny Ramaswamy and Dr. Selena Grace joined the scheduled Board of Trustees meeting in-person and provided information about the evaluation of institutional effectiveness (year 7) report and visit (fall 2024), the NWCCU standards, and the Board's role in governance. The meeting included a question-and-answer session and the data coordinator shared NWCCU's findings from the policies, regulations, and financial review (year 6). On April 30 – May 1, 2024, Dr. Deborah and Ron His Horse Is Thunder provided two days of orientation training to the new Board of Trustee members. The training included topics such as governance, accreditation, policies, and procedures.

**Change in president:** On February 18, 2024, the former president made a request to the Board of Trustees to extend his current contract. On February 28, 2024, the new Board of Trustees entered an executive session to discuss the requested contract extension. On February 29, following the executive session, the Board of Trustees voted on terminating the former president's contract. The Board of Trustees appointed an interim president, Neva Tall Bear (science instructor), at that time. As of July 31, the Board of Trustees has conducted interviews and is in the process of selecting a president.



**Jonah Morsette:** In February 2024, LBHC tragically lost one of their full-time faculty members in a car accident. Due to his stature in the community, his outstanding work at the College, and his part-time work as a musical performer, musician, and songwriter, this loss significantly affected the Crow community – and, especially, the College community. Trauma support services from the Indian Health Service and the local community health center, OneHealth, were brought in to support students, faculty, staff, and community members. A memorial was also held at the College to provide community members with a sense of closure.

**Water main break:** In January 2024, due to extremely cold temperatures, a main water line broke in the LBHC daycare at 5 pm. Flooding occurred throughout the student union building, which shut down the daycare and the student and staff cafeteria – which remained closed as of July 2024. Most student services were also affected. This significantly impacted students as they were unable to access the student union building, use the daycare, or access food on campus. This space had been a hub of social gathering, and students felt displaced. Mold remediation is forcing employees to be relocated from their workspaces.

### **b. Response to outstanding recommendations to be addressed in the EIE**

Response to outstanding recommendations that were requested to be addressed in the EIE (if applicable)

NA



Neva Tall Bear in her lab with a student





# Standard 1. Student success and institutional mission



## Standard 1. Student success and institutional mission and effectiveness

### Standard 1A. Institutional mission

#### 1A1. Institution's mission statement

The institution's mission statement defines its broad educational purposes and its commitment to student learning and achievement.

LBHC's mission statement (updated in 2018) is as follows: LBHC offers high quality degrees, certificates, and programs for professional, workforce, and personal development that bring prosperity and leadership to Crow Country and preserves, protects, and perpetuates the Apsáalooke language, history, and culture (also see 2023-25 catalog, p. 8).

The mission statement defines LBHC's broad educational purposes and its commitment to student learning and achievement. As elaborated upon in 1B2, LBHC's 2024 scorecard (summary and detailed) focuses on the two main goals from its mission statement: (1) Crow language, culture, and history and (2) student success.

The Crow language, culture, and history goal includes four objectives: (a) courses integrate Crow perspectives; (b) active teaching, learning, and assessment strategies; (c) Crow culture and language activities; and (d) digitizing archival collections.

The student success goal includes eight objectives: (a) general education learning outcomes assessment; (b) program learning outcomes assessment, (c) developmental course completion rates, (d) selected general education course completion rates, (e) fall-to-spring retention rate, (f) fall-to-fall retention rate, (g) graduation rate, and (h) vocational licensure success rates.

#### 1A1 evidence

2024 scorecards (summary and detailed) and scorecard webpage

Mission statement: LBHC's website, 2023-25 catalog (p. 8)



Final project for Crow culture class (learning how to set up a Crow-style tipi)



## Standard 1B. Improving institutional effectiveness

### 1B1. Continuous evaluation and planning process

The institution demonstrates a continuous process to assess institutional effectiveness, including student learning and achievement and support services. The institution uses an ongoing and systematic evaluation and planning process to inform and refine its effectiveness, assign resources, and improve student learning and achievement.

LBHC has multiple processes to assess institutional effectiveness, assign resources, and improve student learning and achievement:

**New strategic plan:** See the preface for information about the [new strategic plan](#).

**Department reflection process:** In May 2024, LBHC created a new department reflection process for its non-academic departments, which is conducted annually. The department reflection report focuses on the department's key accomplishments from the previous year, its goals for the coming year (and the strategic plan objective that relates most closely to each goal), and reflections on student success data (enrollment, retention, and graduation rate). The report also includes department reflections on areas of strength, challenges, and improvement. See the [department reflection process webpage](#) for all submitted 2024 department reflection reports. The [summary department reflection report](#) (pp. 3-8) aligns the strategic plan objectives with department goals.

**Program review process:** Prior to the pandemic, LBHC had a somewhat regular and cyclical program review process for its academic programs, which was quite involved and time-consuming (see the [human services](#) and [education](#) examples). In May 2024, the College developed a more streamlined program review process, which is now conducted annually, and focuses on the essential aspects of the College's mission and top priorities: increasing the integration of Crow language and culture into the curriculum, reviewing student success data, and increasing the use of active teaching, learning, and assessment strategies. The initial streamlined form for program review was developed using Google forms. In these forms, faculty reviewed relevant student success data – which is posted on the website – and recorded insights. Two specific areas of the form asked faculty to rate, in comparison with previous years, the integration of Crow language and culture and active teaching, learning, and assessment strategies in each program of study. The program review report also includes program reflections on areas of strength, areas for improvement, and program next steps. Faculty received the link for the form in an email, completed it, and had the option of receiving a copy of their results. See the [program review webpage](#) for all completed 2023-24 program review reports and the [summary report](#). Also, see 1D3 for more details on faculty next steps to improve student success and close equity gaps.

**Program learning outcomes (PLO) assessment process:** In July 2023, faculty established a systematic PLO assessment process. Full-time faculty met for one week in July, where they learned about the purpose behind learning outcomes assessment and the difference between learning outcomes assessment and grades; they created curriculum maps and plans for their associate degrees and certificates (including a cycle for assessment); they formally assessed one PLO for their degree for 2022-23; and they consulted about their findings and articulated next steps. In May 2024, faculty revised curriculum maps and reflected on the next steps from their 2022-23 PLO reports. They also assessed the 2023-24 PLO identified on their curriculum maps. The curriculum maps (e.g., [business administration](#)) and PLO reports (e.g., [human services addiction studies option](#)) are posted on LBHC's [program learning outcomes webpage](#).



**General education learning outcomes (GELO) assessment process:** In July 2023, faculty established a systematic GELO assessment process. Full-time faculty met for one week in July, where they learned about the purpose of learning outcomes assessment and the difference between learning outcomes assessment and grades; they created general education definitions and learning outcomes; they formally assessed one GELO for 2022-23; and they consulted about their findings and identified next steps. In May 2024, faculty assessed their GELO for 2023-24 (e.g., natural sciences). The GELO reports and more information about the GELO process are posted on LBHC's general education learning outcomes webpage.

**Budget advisory committee:** In May 2024, the College created a new budget advisory committee, whose purpose is to create a draft budget for the Board of Trustees to review. The budget is a road map for the College and provides direction to meet its' goals and objectives. The budget advisory committee has wide representation from the faculty council, staff council, president's council, and finance department – each for a 3 year term (see the list of budget advisory committee members in the evidence section). The president and chief finance officer are standing members of the committee. Committee members elect a secretary and chair (see the list of budget advisory committee members in the evidence section). The finance department has one rotating representative. The members of the budget advisory committee represent a variety of perspectives from which to assign resources. See specific details about the committee's work this year in 2E2 (LBHC's response to NWCCU's rationale [in year 7]) and the budget advisory committee minutes (05.16.2024, 06.06.2024, and 07.11.2024).

**Faculty council:** Every year, the faculty council reviews its goals and reflects on its accomplishments. Based on faculty reflection, they had formal training in summer 2020 how to implement online courses (Association of College and University Educators). In 2023, faculty set the goals to integrate more Crow language and culture and increase the use of active teaching and learning strategies in their classes. Both items are also scorecard items and included in the program review process. See faculty reflections in the 2023-24 program review reports summary.

**Administrator and key staff retreat in June:** Every June, administrators and key staff go on a retreat for two and a half days where they reflect on the previous year's achievements and set goals for the coming year.

**Student course evaluations:** Each semester, students complete a course evaluation for each course in which they were enrolled. The assessment coordinator collects the evaluations and the dean of academics provides them to faculty.

**Scorecard:** LBHC's 2024 scorecards (summary and detailed) are posted on LBHC's scorecard webpage. These documents track the College's progress on its goals for mission fulfillment and are starting to be used more widely across the College. Planning and reflection focus on the two scorecard goals of (1) Crow culture, language, and history and (2) student success. At the bottom of every objective page is a section that outlines LBHC's "next steps" regarding that objective. See 1B2 for more information.



## Moving forward

LBHC intends to institutionalize the above systematic evaluation and planning processes; develop a checklist and timeline; and designate two committees, by the end of fall 2024, to oversee them – working with and accompanying departments and faculty through these processes – to result in the important discussions necessary for these processes to be meaningful to the College and its mission.

One committee will oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes. And the second committee – the student success data committee (including administrators, staff, students, and faculty) – will be responsible for ensuring student success data, peer data, scorecards, and the strategic plan are used, conversations occur, and next steps are taken to improve student success. All decision-making bodies (including the Board of Trustees) need to review these sources of information to make institutional decisions.

In addition, in August, faculty have scheduled a day together to review their program review reports and to determine next steps.

## 1B1 evidence

2024 scorecards ([summary](#) and [detailed](#)) and [scorecard webpage](#)

Budget advisory committee members and positions: Neva Tall Bear (interim president, BAC chair), Jamie Riley (faculty, BAC secretary), Aldean Good Luck (CFO), Patricia Whiteman (dean of students), Bill Old Crow (registrar), Elden Not Afraid (finance/AP), and Tim McCleary (dean of academics) and Lorna Little Owl (PR/grants) who are unofficial members

Budget advisory committee minutes: [05.16.2024](#), [06.06.2024](#), and [07.11.2024](#)

[Department reflection process webpage](#) and [summary department reflection report](#)

[General education learning outcomes webpage](#) (see sample [natural sciences GELO report](#))

[Program learning outcomes webpage](#) (see sample [business administration curriculum map](#) and [human services PLO report](#))

[Program review webpage](#) (also see old 2020 [human services](#) and [education](#) examples) and [2023-24 program review reports summary](#) ([Crow language and culture](#) and [increase the use of active teaching and learning strategies](#))



## 1B2. Mission fulfillment goals in comparison to peer colleges




The institution sets and articulates meaningful goals, objectives, and indicators of its goals to define mission fulfillment and to improve its effectiveness in the context of and in comparison with regional and national peer institutions.

**History of scorecards:** From 2010 through 2023, LBHC used a scorecard for measuring mission fulfillment, which included the following four core themes: (1) access to educational training and opportunities, (2) commitment to community education and outreach, (3) dedication to the enhancement of the Crow culture and language, and (4) assuring student success (this core theme was added in 2018). Each core theme had corresponding objectives (23 in total), indicators of achievement, and intended outcomes, which, up until 2017, were measured and reported on annually in each fall for the previous academic year in a scorecard of college mission achievement (see the [2016-17 scorecard report](#)). Just prior to and since the pandemic, this reporting cycle was interrupted.

**Updated score card:** In July 2023, LBHC updated its scorecard to focus on the two central goals of its mission: (1) Crow language, culture, and history and (2) student success. This new scorecard includes more meaningful as well as qualitative objectives, including Crow culture, language, and history; the general education and program learning outcomes; and active teaching and learning strategies objectives.<sup>1</sup> The scorecard objectives align with the four strategic initiatives in the [2023-27 strategic plan](#) – the previous four core themes.

The **detailed scorecard** reports the following information: the objective, description, evidence if successful, baseline data, most recent data, goal for 2024, status to date, source of data / evidence, the person responsible for reporting, and the next steps.

The **status** of each objective is scored as follows:

-  met goal
-  close to or making progress to meeting goal
-  not close to meeting goal

**Recent scorecard review:** In fall 2023, LBHC generated and reported on the new scorecard data (see the 2023 [summary](#) and [detailed](#) scorecard reports). And in spring 2024, faculty and staff reviewed the data, modified the scorecard slightly, and updated its score for each of the scorecard objectives during faculty council meetings, all day faculty workshops, administrator meetings, and other meetings including staff. The 2024 scorecards ([summary](#) and [detailed](#)) are also posted on LBHC's [scorecard webpage](#).

**Peer comparison:** Under “student success”, two of LBHC’s scorecard objectives (fall-to-fall retention rate and 3-year graduation rate) include peer comparison data. LBHC’s goal for these objectives is that LBHC is within or higher than the range of its peer tribal colleges. For the last five years, LBHC has been within the range of its peer tribal colleges for fall-to-fall retention rate and 3-year graduation rate. See the [LBHC and its 6 peer colleges report](#) (on [LBHC’s student success data webpage](#)).

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<sup>1</sup> On August 1, 2023, at an all employee orientation, all LBHC faculty and staff reviewed and provided feedback about the scorecard objectives.



## Goal and 2024 scores for mission fulfillment

The goal for mission fulfillment is that at least 4 of the 12 objectives are met (●) and at least another 6 are close to being met (▲).

In 2024, LBHC met (●) 5/12 of its objectives and was close to or making progress on meeting (▲) 7/12 of its objectives. No objectives were scored as not close to meeting the goal (■).<sup>2</sup> Currently, according to this definition, LBHC is fulfilling its mission. The table below outlines the 2024 goals and scores.

*Definition of mission fulfillment: 2024 goals and scores*

| 2024   | ●  | ▲  | ■ |
|--|----|----|---|
| Goal: Minimum # of objectives for each color           | 4+ | 6- | 0 |
| Score: # of objectives that were scored for each color | 5  | 7  | 0 |

Overall, in 2024, the College performed well on its Crow language, culture, and history objectives and struggled more on its student success objectives as indicated in the scorecard summary on the next page.

**Moving forward:** After completion of this accreditation cycle, LBHC plans to revise its scorecard objectives to continue to make them as meaningful as possible. The College will also further develop the scorecard scoring process to increase sensitivity and better represent its processes. By the end of fall 2024, a student success data committee – including administrators, staff, students, and faculty – will be formed and responsible for ensuring student success data, peer data, scorecards, department reflection process reports, and the strategic plan are used; conversations occur; and next steps are taken to improve student success. This committee will ensure the scorecard is reviewed annually and the information is used.

### 1B2 evidence

[2023-27 strategic plan](#) (on [LBHC's strategic plan webpage](#))

2024 scorecards ([summary](#) and [detailed](#)) and [scorecard webpage](#) (2016-17 scorecard report)

[LBHC and its 6 peer colleges report](#) (on [LBHC's student success data webpage](#))

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<sup>2</sup> As scored by faculty, administrators, and some staff.



## LBHC's 2024 scorecard summary

Status: ● met goal      ▲ close to or making progress to meeting goal      ■ not close to meeting goal

### 1. Crow language, culture, and history

- a. Courses integrate Crow perspectives and knowledge.
- b. Instructors use active teaching, learning, and assessment strategies in all classes.
- ▲ c. LBHC offers continuing education and Crow cultural enrichment and language activities to students, faculty, staff, and the wider community.
- d. LBHC digitizes and publishes online Crow archival audio-visual collections.

### 2. Student success

- ▲ a. General education learning outcomes assessment: Students develop the foundational skills integral to their professional, academic, and personal lives.
- ▲ b. Program learning outcomes assessment: Students develop the skills required to perform duties to entry level standards in their profession or those required to transfer to a four-year college.
- c. Developmental course completion rates: Students enrolled in developmental courses complete them successfully, so they can move on to college-level courses.
- ▲ d. Selected general education course completion rates: Students enrolled in general education courses complete them successfully, so they can move on to higher level coursework.
- ▲ e. Fall-to-spring retention rate: New students beginning in the fall semester, continue at LBHC in the following spring semester.
- ▲ f. Fall-to-fall retention rate: New students beginning in the fall semester continue at LBHC the following fall semester and new LBHC students beginning in the fall semester continue at LBHC the following fall semester as often or more often than students at its peer colleges.
- ▲ g. Graduation rate: LBHC students seeking an associate degree successfully graduate within 3 years and LBHC students seeking an associate degree successfully graduate within 3 years as often or more often than students at its peer colleges.
- h. Vocational graduate success: Graduates with vocational certificates and degrees are successful and can pass vocational licensure tests, continue school, or work in the field.





### 1B3. Inclusive planning, resource allocation, improved effectiveness

The institution provides evidence that its planning process is inclusive and offers opportunities for comment by appropriate constituencies, allocates necessary resources, and leads to improvement of institutional effectiveness.

As was mentioned in the preface, in summer 2023, Deborah His Horse Is Thunder facilitated two and a half days with the administration team and key staff where they brainstormed and discussed ideas for the new strategic plan. Additionally, employees, board members, alumni, and recent graduates convened at a strategic planning session where they identified strategic priorities, issues, and concerns for a strategic plan. A careful review of the LBHC's strengths, weaknesses, opportunities, and threats (SWOT) were identified and these findings were integrated into the 2023-27 strategic plan:

**Strengths** include LBHC's focus on Crow culture, the use of Crow language, and the care the College shows to the students and community.

**Weaknesses** include a lack of communication, outdated/inefficient technology, lack of knowledge in technology, and limited degree options.

**Opportunities** include the potential to develop 4-year degrees as well as 2 + 2 degrees; opportunities related to student services including housing, free tuition, books, and online classes; and possible partnerships, including community and outside agencies and local schools.

**Threats** include personal threats, such as human trafficking, cyberbullying, harassment, and scareware; lack of funding, including the fear of losing federal funding due to the low student enrollment and the lack of funds for the Crow cultural center and museum; and politics, including outside influence, distrust, and tribal politics.

The Board of Trustees approved the 2023-27 strategic plan on Nov 2, 2023. The College created several goals and action plans, which are used to guide the College. For example, to enhance marketing and communications, LBHC created a PR position who implemented a new platform for marketing the College. Consistent with the SWOT analysis, LBHC created a set of goals for its scorecard focusing on Crow language and culture and student success. For example, to address the weakness of limited degree options and the opportunity of creating bachelor degrees, the College continues to develop its 2+2 education program and is developing a business 2+2 degree. Every summer, all employees gather for a two and a half day orientation and planning session for the coming school year, where all departments share their accomplishments from the previous year and plans for the coming year.

**Moving forward:** In 2024-25, LBHC is going to attempt to align budget items with objectives in the strategic plan and formally integrate the new department reflection process (summary report), so it aligns with college planning processes (currently, it is connected to the strategic plan). Also, LBHC is currently receiving funds from the American Indian College Fund to develop a strategic enrollment management (SEM) plan, that centers the student experience as it creates a culturally and community-informed approach to student engagement. A SEM committee formed to reflect on student data and enrollment components (landscape form) to identify priority areas related to the strategic plan and focused on need (project plan). Key enrollment indicators are being developed, using AIMS and IPEDs data, to create a culture of data informed decision making.

#### 1B3 evidence

2023-27 strategic plan (on LBHC's strategic plan webpage)

Department reflection process webpage and summary department reflection report

SEM plan: landscape form and project plan



## 1B4. Uses internal/external monitoring for mission, planning, achieving goals

The institution monitors its internal and external environments to identify current and emerging patterns, trends, and expectations. Through its governance system it considers such findings to assess its strategic position, define its future direction, and review and revise, as necessary, its mission, planning, intended outcomes of its programs and services, and indicators of achievement of its goals.

Two examples provide evidence that LBHC monitors its internal and external environments to identify current and emerging patterns, trends, and expectations: (1) the budget advisory committee is an example of obtaining feedback from internal constituencies and (2) the Crow cultural center and museum is an example of obtaining extensive feedback from external constituencies.

**Budget advisory committee (internal):** As outlined in 1B1, the newly formed budget advisory committee provides faculty council, staff council, and president’s council the opportunity to be actively involved in preparing a budget for LBHC. The committee allows each department the opportunity to provide input as to how funds are allocated. Having the input of the various departments provides a wide range of perspectives from within the College, thereby encouraging more effective and efficient workflows and processes, as well as the ability to identify current and emerging patterns, trends, and expectations. For example, at the second committee meeting, to increase effective and efficient workflows and processes for payroll, HR, and the faculty, the members analyzed the impact of changing the structure of faculty contracts (see the 06.06.2024 meeting minutes, item 5a).

**Crow cultural center and museum (external):** Directly aligned with its mission, LBHC is planning to build a cultural center and museum, which will be located on the LBHC campus. In fall 2020, the museum planning committee held zoom focus group meetings with each Crow reservation district for input about their needs and hopes for the museum. Input was also taken about the preferred design of the cultural center and museum. Also, the planning committee held focus group meetings with groups of elder men and elder women. The planning committee conducted a series of selected interviews with key Crow cultural practitioners. The community’s needs were used to inform the direction of the museum, including a 3-year strategic plan. The planning committee pursued funding based on these needs. When the museum is finally built, the meeting space needs of different groups will be realized (e.g., The Tobacco Society, a spiritual organization that is the pinnacle of Crow society and spirituality). The planning committee continues to hold regular community and college public meetings (including two remote districts on the reservation) concerning the purposes and design of the center, which feed directly into the planning of the center. In 2026, phase 1 – which is the renovation of the existing Cultural Learning Lodge into a Crow hall of honor, elders’ center, and gift shop – should be complete.

In addition, numerous committees govern LBHC’s affairs including faculty council, staff council, president’s council, academic council, budget advisory committee, accreditation activities committee, library committee, safety committee, and Crow language consortium. Through its governance system, LBHC considers current patterns and trends to define its future direction, and review and revise, as necessary, its intended outcomes of its programs and services.

For example, the library committee includes community members and college employees. Its charge is to make recommendations to the library, archives, and cultural center and museum regarding its mission, policies, and programs to improve and maintain the services supporting the



academic program and the community's information needs (which includes input on the acquisition of library resources). It also provides advice and counsel on library, archives, cultural center, and museum related issues. The library has a set of learning outcomes that includes students and community members being able to examine aspects of Crow history and culture. Library Crow cultural and local history symposia are provided based on the expressed interest of the community. During these events, community feedback is solicited, which informs future offerings.

Also, the Crow language consortium has a board of internal and external community members, facilitated by the College. The consortium provides feedback and guidance about the Crow language program and all aspects of instruction.

When faculty become aware of new trends in the community or in their programs, they adjust their programs as needed. Also, faculty compare their program curriculum to similar degrees at other Montana 2-year and 4-year institutions. This allows for faculty to identify trends and expectations within programs, which can clarify future directions. Internally, each program of study has a committee, including faculty and staff who teach in the program or in a related discipline. These committees advise and review any proposed changes to the programs of study based on these trends.

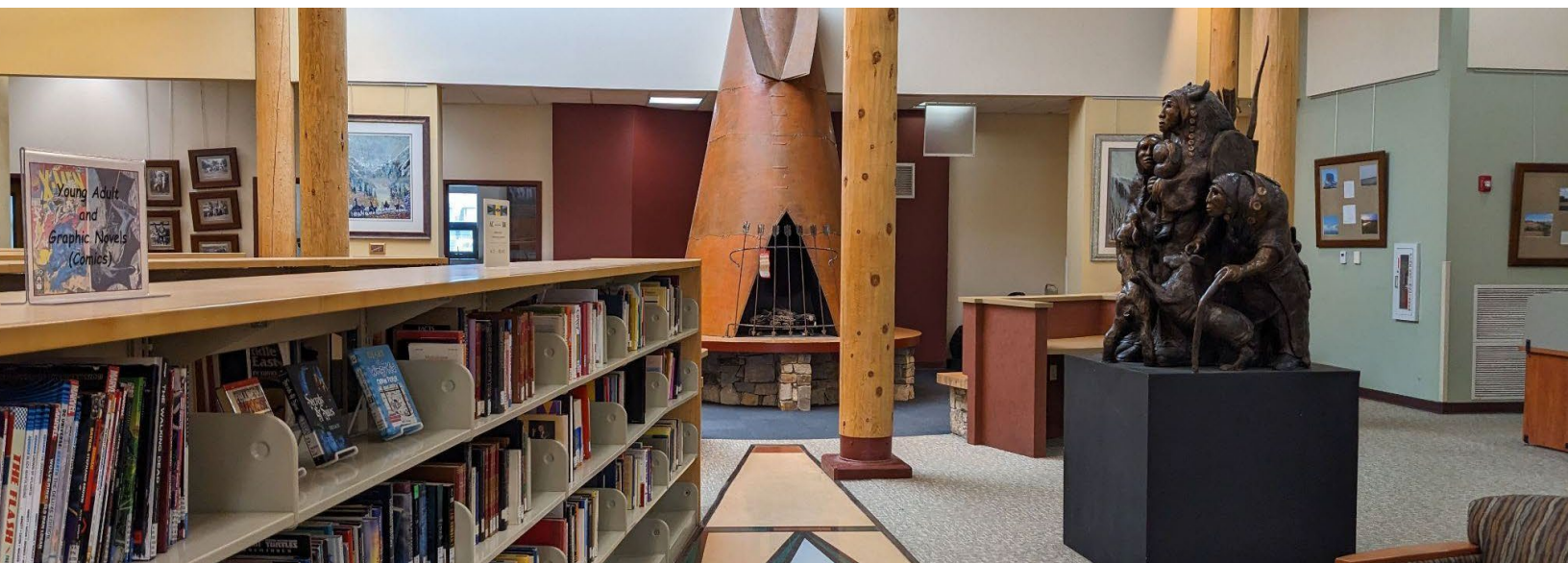
In terms of creating new programs, sometimes the community identifies needs for workforce ready employees. For example, a 2019 community-wide survey identified a need for licensed plumbers, electricians, and HVAC professionals on the Crow reservation. In response to these needs, in 2021, the College created the building trades program.

### **Moving forward**

LBHC would like to conduct a formalized SWOT analysis more frequently to address internal and external strengths, weaknesses, opportunities, and threats. With the SWOT analysis it may determine areas of improvement for committees and other areas across the campus.

### **1B4 evidence**

Budget advisory committee minutes: [05.16.2024](#), [06.06.2024](#), and [07.11.2024](#)



LBHC library



## Standard 1C. Student learning

### 1C1. Programs with appropriate content/rigor, student learning outcomes, lead to degrees

The institution offers programs with appropriate content and rigor that are consistent with its mission, culminate in achievement of clearly identified student learning outcomes that lead to collegiate-level degrees, certificates, or credentials and include designators consistent with program content in recognized fields of study.

#### Appropriate content in recognized fields of study

LBHC offers the community many educational opportunities – from high school completion, obtaining a vocational career, completing associate degrees, and transferring to other institutions – all within its mission of preserving, perpetuating, and protecting Crow culture.

LBHC offers two-year associate degrees in business, Crow studies, directed individualized studies, education, human services, information technology, liberal arts, math, and science ([2023-25 catalog](#), pp. 39-86).

LBHC offers one-year certificates in agriculture (pilot program), building trades, Crow studies (tribal management), education (early childhood), and highway construction ([2023-25 catalog](#), pp. 87-92). These certificates are meant to enhance skills and to prepare students for workforce opportunities. Some LBHC certificates and degrees satisfy licensure and professional certification requirements and meet standards for employment in their respective fields.

LBHC's offerings are based on its mission to preserve, perpetuate, and protect Crow language and culture and to offer high quality degrees, certificates, and programs in disciplines that will benefit the Crow community. As a result, the general education core requirements ([2023-25 catalog](#), pp. 37-38) ensure students take Crow language and culture classes. Also, in the humanities and the arts and the diversity and social science requirements, students must select at least one Crow class. In addition, all classes attempt to integrate Crow language and/or culture.

Programs and courses arise from the needs of the community. For example, the community is currently asking for a 2 + 2 business degree and to bring back the Plains sign language class.

**Appropriate rigor:** Program rigor is demonstrated in multiple ways:

*Course learning outcomes:* Each course has *course learning outcomes* listed in the course syllabus. In addition, instructors structure syllabi (e.g., [SC 244](#) [environmental science] and [HU 227](#) [American Indian representation in film]) and classes to align the teaching and learning activities with the assessments.

*Program learning outcomes and curriculum mapping:* All degrees and certificates have clearly identified program learning outcomes, which are posted in the [2023-25 catalog](#) (pp. 41-92) and in curriculum maps on the [program learning outcomes webpage](#). Over the last couple of years, faculty have made a concentrated effort to update their program curriculum maps and program learning outcomes (e.g., [business administration](#)). The curriculum mapping process has helped faculty to see where gaps existed in the curriculum. Faculty formally assess one program learning outcome each year and reflect on the next steps. See 1C5 for more information.



*Transferability:* Faculty ensure their program’s curriculum is aligned with *transfer* colleges and industry needs. Faculty compare their program curriculum to similar degrees at other Montana 2-year and 4-year institutions. This allows for faculty to identify trends and expectations within programs, and to maintain rigor, so when LBHC graduates transfer to other colleges they have the greatest chance for success. Internally, most programs of study have a committee including faculty and staff who teach in the program or a related field. These committees advise and review proposed changes to the programs of study based on trends at other institutions. Currently, LBHC has an articulation agreement with the University of Montana Western in early childhood education and elementary education and is in the process of finalizing an articulation agreement with MSU-Billings in business.

*Program review process:* The College’s program review process is conducted annually and focuses on the essential aspects of the College’s mission and top priorities: increasing the integration of Crow language and culture into the curriculum, reviewing student success data, and increasing the use of active teaching, learning, and assessment strategies. The program review report also includes program reflections on areas of strength, areas for improvement, and program next steps. See the [program review webpage](#) for all completed 2023-24 program review reports and the [2023-24 program review reports summary](#).

Students must earn a minimum 2.0 cumulative GPA to obtain a degree or certificate ([2023-25 catalog](#), p. 34, graduation requirements).

### **Addendum 7c: LBHC’s distance education programs are consistent with its mission and educational objectives**

Regardless of the mode of learning, the program learning outcomes are aligned with LBHC’s mission (e.g., Crow culture is the foundation) and go through the same evaluation or review process. The course learning outcomes are also the same, regardless of the mode of learning (e.g., [BU 101](#) [economic way of thinking] and [PY 101](#) [introduction to psychology] syllabi).

### **Moving forward**

Over the last two years, LBHC has implemented the above processes to improve institutional effectiveness and a top priority is to maintain and institutionalize these processes. By the end of fall 2024, LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes.

### **1C1 evidence**

[2023-25 catalog](#) (p. 34, 37-92)

2024 scorecards ([summary](#) and [detailed](#)) and [scorecard webpage](#)

[General education learning outcomes webpage](#)

[Program learning outcomes webpage](#) (includes curriculum maps, e.g., [business administration](#))

[Program review webpage](#) ([2023-24 program review reports summary](#))

Syllabus examples: [BU 101](#) (economic way of thinking), [HI 105](#) (world civilization), [HU 227](#) (American Indian representation in film), [IS 101](#) (introduction to computers and applications), [PY 101](#) (introduction to psychology), [SC 244](#) (environmental science)



## 1C2. LBHC awards degrees based on student learning, appropriate breadth

The institution awards credit, degrees, certificates, or credentials for programs that are based upon student learning and learning outcomes that offer an appropriate breadth, depth, sequencing, and synthesis of learning.

LBHC awards credit, degrees, and certificates based on student learning.

Learning outcomes are written in a measurable way following best practices, which contribute to progressive synthesis of learning (see [How to write learning outcomes at the course, program, or general education levels](#)).

Courses have course learning outcomes that articulate the skills and knowledge that instructors expect their students to demonstrate by the end of each course.

All degrees and certificates have program learning outcomes. LBHC publishes its program learning outcomes – the skills it expects its students to demonstrate by the end of a degree or certificate – in its [2023-25 catalog](#) (p. 39-92) and in its curriculum maps (e.g., [highway construction](#)) on its [program learning outcomes webpage](#). Course learning outcomes are identified on course syllabi (e.g., [IS 101](#)).

New students must take Accuplacer tests to place them in the appropriate math and English courses.

Students follow course sequences within each program of study that first establish basic knowledge and skills and then build upon these foundations to an appropriate depth. Students may take the courses or test out of them. Knowledge and skills are assessed multiple times during a student's completion of an LBHC program of study (see curriculum maps on the [program learning outcomes webpage](#)). In addition, LBHC program faculty consult – with outside institutions – the knowledge and skills necessary for students to further their education. Each department uses various techniques for assessing this learning. For example, some classes, such as math and introduction to psychology conduct pre and post-tests to inform the coursework and grades. Also, some faculty keep artifacts of students' work.

*Program review process:* The College's program review process is conducted annually and focuses on the essential aspects of the College's mission and top priorities: increasing the integration of Crow language and culture into the curriculum, reviewing student success data, and increasing the use of active teaching, learning, and assessment strategies. The program review report also includes program reflections on areas of strength, areas for improvement, and program next steps. See the [program review webpage](#) for all completed 2023-24 program review reports.

### Moving forward

Faculty plan to use the program review process in a more intentional and institutionalized way to evaluate programs to improve student success and learning, and to keep an open channel of communication among faculty in different programs. By the end of fall 2024, LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes.

### 1C2 evidence

[2023-25 catalog](#) (p. 39-92)

[How to write learning outcomes at the course, program, or general education level handout](#)

[Program learning outcomes webpage](#) (includes curriculum maps, program learning outcomes, reports)

[Program review webpage](#) (2023-24 program review reports summary)

Syllabus examples: [BU 101](#), [HI 105](#), [HU 227](#), [IS 101](#), [PY 101](#), [SC 244](#)



### 1C3. Publish program learning outcomes and course learning outcomes

The institution identifies and publishes expected program and degree learning outcomes for all degrees, certificates, and credentials. Information on expected student learning outcomes for all courses is provided to enrolled students.

LBHC publishes its certificate and degree program learning outcomes in its 2023-25 catalog (p. 41-92) and in the degree and certificate curriculum maps (e.g., natural science) on the program learning outcomes (PLO) webpage. Also, posted on the PLO webpage are the PLO reports (e.g., human services) for 2022-23 and 2023-24, reporting the formal assessment of PLOs for degrees and certificates.

Course learning outcomes are listed on syllabi for enrolled students (see sample syllabi below).

#### Moving forward

To be more consistent with the PLO and general education learning outcomes (GELO) work (which is in line with learning outcomes best practices), faculty are converting to using the term “course learning outcomes” (rather than course objectives) on their syllabi. Faculty are also updating their course learning outcomes using the principles outlined in the “How to write learning outcomes at the course, program, or general education level” handout to articulate measurable learning outcomes and indicators (which is posted on the PLO and GELO webpages).

#### 1C3 evidence

2023-25 catalog (p. 41-92)

General education learning outcomes webpage

How to write learning outcomes at the course, program, or general education level handout

Program learning outcomes webpage (includes curriculum maps, e.g., natural science, and PLO reports, e.g., human services)

Syllabus examples: BU 101, HI 105, HU 227, IS 101, PY 101, SC 244



## 1C4. Admission and graduation requirements

The institution's admission and completion or graduation requirements are clearly defined, widely published, and easily accessible to students and the public.

### Admissions requirements

LBHC has an open admissions policy. This means anyone who is a graduate of an accredited high school or has received a HiSET (GED) certificate is eligible for admission. Admission requirements and procedures are outlined in the [2023-25 catalog](#) (pp. 26-28) and on [LBHC's admissions webpage](#).

LBHC articulates its policies and procedures regarding admission, placement, and registration in its [2023-25 catalog](#) (admissions, pp. 26-28; placement testing, p. 28; registration, pp. 29-34) and its [2024-25 Ram-tracker student handbook](#) (placement testing, p. 15).

The [2023-25 catalog](#) (p. 27) outlines requirements for dual enrolled high school students who are juniors or seniors, as well as transfer students.

The admissions office has checklists that mirror the information in the catalog that they follow with students.

### Graduation requirements

Information on academic programs and courses, including degree and program completion requirements, required course sequences, and projected timelines to completion are outlined in the [2023-25 catalog](#) (pp. 34, 39-92).

### Moving forward

LBHC implementing a checklist process in registration (which includes the student has gone through admissions), where students obtain signatures from the appropriate faculty and staff upon completing enrollment tasks. LBHC offered an advising training to faculty in June 2024 and the College will be implementing this annually moving forward.

### 1C4 evidence

[2023-25 catalog](#) (pp. 26-34, 39-92)

[2024-25 Ram-tracker student handbook](#) (p. 15)

[Admissions webpage](#)



2023 graduate of LBHC, 5 time ultimate warrior champion





## 1C5. System of assessment to evaluate quality of learning in programs

The institution engages in an effective system of assessment to evaluate the quality of learning in its programs. The institution recognizes the central role of faculty to establish curricula, assess student learning, and improve instructional programs.

LBHC has systems of assessment in place – at the program and general education levels – to reflect on the quality of learning in its programs. The [2022-23 assessment plan and report](#), the [2023-24 assessment plan and report](#), and the [2024-25 assessment plan](#) lay out the goals and accomplishments related to the program learning outcome and general education learning outcome work for each year. A [summary of 2023 and 2024 faculty reflections on program learning outcomes assessment and general education learning outcomes assessment](#) is provided on the [general education learning outcomes webpage](#) and [program learning outcomes webpage](#).

**Program learning outcomes (PLO) assessment process:** LBHC has a systematic PLO assessment process. Full-time faculty met for one week in July 2023, where they learned about the purpose behind learning outcomes assessment and the difference between learning outcomes assessment and grades; they created curriculum maps and plans for their associate degrees and certificates (including a cycle for assessment); they formally assessed one PLO for their degree for 2022-23; and they consulted about their findings and articulated next steps. In May 2024, faculty revised curriculum maps and reflected on the next steps from their 2022-23 PLO reports. Faculty also assessed the 2023-24 PLO identified on their curriculum maps. The curriculum maps (e.g., [natural science](#)) and PLO reports are posted on LBHC's [PLO webpage](#).

**General education learning outcomes assessment process:** Faculty who teach general education courses assess one general education learning outcome per year. A [summary of 2023 and 2024 faculty reflections on general education learning outcomes assessment](#) is provided on the [GELO webpage](#), with the blank report templates, and completed GELO reports formally assessing one GELO per year in 2022-23 and in 2023-24. See more details in 1C6.

Several other processes assist faculty to reflect on the **quality of learning** in its programs:

**Program review process:** The College's program review process is conducted annually of all academic programs and focuses on the essential aspects of the College's mission and top priorities: increasing the integration of Crow language and culture into the curriculum, reviewing student success data, and increasing the use of active teaching, learning, and assessment strategies. The program review report also includes program reflections on areas of strength, areas for improvement, and program next steps. See the [program review webpage](#) for all completed 2023-24 program review reports and [summary](#). For more details refer to 1B1.

*Peer review of online classes:* Recently, faculty who teach online courses created a simple peer review of regular and substantive interaction. Instructors who are currently teaching online met to share strategies that are working and strategies that could be improved. Their reflections of each other's courses are shared in these reflection reports: [BU 241](#) and [SC 132](#). As a result of the peer review, they determined several next steps to improve distance learning: Faculty plan to add more scheduled meet times, think about alternatives to discussion forums (because they are hit-and-miss in terms of being able to get students to interact and participate), integrate more simulations to increase student engagement, and use more tools like google video quizzes. They believe a deeper discussion of successes with other faculty will help in terms of building curriculum.



## **Faculty establish curricula, assess student learning, and improve instructional programs**

LBHC faculty establish their own curricula, assess student learning, and improve instructional programs, as outlined in the [faculty handbook](#) (p. 8, 2.5 academic freedom; p. 9, 2.7 changes in curriculum; p. 20, 3.7 college service). In addition to the more formal learning outcomes assessment work, LBHC faculty use multiple informal, formal, formative, and summative assessment techniques to inform improvement of instruction. Informally, each department has a committee that discusses and reviews (as needed) changes to the department's programs of study. During these departmental committee meetings and discussions, committee members reflect on the next steps or adjustments to programs.

## **Moving forward**

LBHC faculty would like to maintain and institutionalize these current assessment processes across programs. By the end of fall 2024, LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes.

## **1C5 evidence**

Assessment plan and reports: [2022-23](#), [2023-24](#), [2024-25](#)

[General education learning outcomes webpage](#)

Peer review of online classes: [BU 241](#) and [SC 132](#)

[Program learning outcomes webpage](#) (includes curriculum maps, e.g., [natural science](#), and PLO reports, e.g., [human services](#))

[Program review webpage \(2023-24 program review reports summary\)](#)

[Summary of 2023 and 2024 faculty reflections on program learning outcomes assessment and general education learning outcomes assessment report](#)



## 1C6. General learning outcome assessment

Consistent with its mission, the institution establishes and assesses, across all associate and bachelor level programs or within a General Education curriculum, institutional learning outcomes and/or core competencies. Examples of such learning outcomes and competencies include, but are not limited to, effective communication skills, global awareness, cultural sensitivity, scientific and quantitative reasoning, critical analysis and logical thinking, problem solving, and/or information literacy.

All students desiring to graduate from LBHC with an associate degree must complete the general education core requirements, which are designed to provide a broad educational foundation and to preserve, perpetuate, and protect the Crow culture and language. These requirements are in addition to courses outlined in the student's program of study and are listed under the general education core requirements section of the [2023-25 catalog](#) (pp. 37-38).

General education learning outcomes (GELOs) are overarching skills that are taught in the general education core requirements. LBHC's [GELO webpage](#) includes links to the [assessment plan and report webpage](#) (e.g., [2023-24 assessment plan and report](#) and [2024-25 assessment plan](#)), which include a list of annual goals and progress regarding the GELO assessment process.

### **LBHC's core requirements, required number of credits, and GELO definitions are as follows:**

Arts and humanities (3 credits): Students will be able to identify and utilize analytical, critical, and speculative methods in understanding the human condition as articulated in literature, philosophy, religion, and the visual and performing arts.

College seminar (3 credits): Students will be able to communicate in written and spoken forms.

College writing (3 credits): Students will be able to communicate in writing.

Crow language (3-6 credits): Students will be able to have conversations and write in the Crow language at a basic level.

Crow studies (3 credits): Students will be able to explain issues related to the preservation, perpetuation, and protection of Crow culture.

Diversity and social science (3 credits): Students will be able to apply basic perspectives and principles as expressed and used in the various fields of the social sciences and diverse populations.

Natural science (7-8 credits): Students will be able to apply scientific terminology and investigate and draw conclusions about the natural world.

Quantitative reasoning (3-4 credits): Students will be able to apply quantitative (mathematical and statistical) concepts and operations to solve problems, interpret data, and communicate ideas.

Skills for success (1 credit): Students will be able to use basic academic fundamentals such as note-taking, test-taking, and time management.

Faculty use the "[How to write learning outcomes at the course, program, or general education levels](#)" handout to articulate measurable learning outcomes and indicators.

Faculty who teach general education courses assess one GELO per year. A [summary of 2023 and 2024 faculty reflections on general education learning outcomes assessment](#) is provided on the [GELO webpage](#), with the blank report templates, and completed GELO reports formally assessing one GELO per year in 2022-23 and in 2023-24.



## **Addendum 7c: LBHC ensures learning outcomes and levels of student achievement are comparable across modalities**

LBHC offers courses and programs that benefit the tribal community and allow the College to serve a wider area – whether tribal members are on or off reservation – through different modalities. LBHC ensures learning outcomes and levels of student achievement are comparable across modalities. Regardless of the mode of learning, core competencies are consistent across the curriculum.

The program learning outcomes and general education learning outcomes are aligned with LBHC’s mission (e.g., Crow culture is the foundation) and go through the same evaluation or review process.

Program learning outcomes (also see the 2023-25 catalog, pp. 41-92, for each program), general education learning outcomes (also see the 2023-25 catalog, pp. 37-38 and pp. 41-92), and course learning outcomes are consistent and are required for each program of study, as evidenced by course syllabi (e.g., IS 101 [introduction to computers and applications] syllabus and others in the evidence section below), the program learning outcome reports, curriculum maps, and the general education learning outcome reports.

Student course evaluations are conducted every semester and the feedback is provided to faculty.

Finally, the peer online course review process provides a forum for faculty teaching distance education to reflect on teaching, learning, and assessment.

### **Moving forward**

Faculty would like to continue to meet annually to complete their GELO reports and to continue their conversations about student success in GELOs. By the end of fall 2024, LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes.

### **1C6 evidence**

2023-25 catalog (pp. 37-38, 41-92)

Assessment plan and reports: 2022-23, 2023-24 2024-25

General education learning outcomes webpage

How to write learning outcomes at the course, program, or general education levels handout

Program learning outcomes webpage

Summary of 2023 and 2024 faculty reflections on general education learning outcomes assessment report

Syllabus examples: BU 101, HI 105, HU 227, IS 101, PY 101, SC 244



## 1C7. Assessment results improve student learning

The institution uses the results of its assessment efforts to inform academic and learning-support planning and practices to continuously improve student learning outcomes.

In July 2023, LBHC faculty established a systematic general education learning outcomes assessment process and program learning outcomes assessment process. Full-time faculty met for one week in July, where they learned about the purpose of learning outcomes assessment and the difference between learning outcomes assessment and grades; created general education definitions and learning outcomes; formally assessed one general education learning outcome for 2022-23; created program outcome curriculum maps and plans for their associate degrees and certificates (including a cycle for assessment); formally assessed one PLO for their degree for 2022-23; and consulted about their findings and identified next steps to improve student learning.

In May 2024, faculty participated in additional training and continued their GELO and PLO work for 2023-24. During the 2023 and 2024 sessions, faculty reflected on actions they could take to improve student learning. For example, in July 2023, faculty noted that in 2023-24 they wanted to increase cultural learning opportunities for faculty and update general education core requirements and learning outcomes – both of which were successfully completed. In May 2024, faculty identified a need for technology training, specifically in AI, Google suite, MS Word, and Cloudram (AI training was offered in July 2024). And faculty continue to pay attention to increasing the engagement of students in the classroom by using more active and interactive methods of teaching and assessment. These reflections, and more, are captured in this summary of 2023 and 2024 faculty reflections on program learning outcomes and general education learning outcomes assessment (numbers 6-8), posted on LBHC's general education learning outcomes webpage and program learning outcomes webpage.

A specific programmatic example where the PLO assessment work led to modifications of current curriculum is noted in the human services (addiction studies and human services option) 2022-23 program learning outcome (PLO) report. The instructor formally assessed the PLO, “students will be able to conduct mock counseling sessions using basic counseling responses”. To improve performance on the PLO, in 2023-24, although the instructor spent more class time and attention on outlining, practicing, demonstrating, and modeling the interpretive responses, students continued to perform below expected levels. So in 2024-25, the instructor plans on implementing assessment (i.e., a mock counseling session) specifically for interpretive responses; incorporating video demonstrations of these responses; considering cultural attitudes related to interpreting another person’s disclosures; and adding a lab in which the basic counseling responses are practiced.

See additional information on general education learning outcomes assessment in 1B1 and 1C6 and program learning outcomes assessment in 1B1, 1C1, 1C3, and 1C5.

In addition to the more formal learning outcomes assessment work, LBHC faculty use multiple informal, formal, formative, and summative assessment techniques to inform improvement of instruction. Informally, each department has a committee that meets (as needed) and discusses and reviews changes to the department’s programs of study. During these departmental committee meetings and discussions, committee members reflect on the next steps or adjustments to programs.



Students follow course sequences within each program of study that first establish basic knowledge and skills and then build upon these foundations. Knowledge and skills are assessed multiple times during a student's completion of an LBHC program of study (see curriculum maps on the [program learning outcomes webpage](#)). In addition, LBHC programs of study discuss – with outside institutions – the knowledge and skills necessary for students to further their education. Each department uses various techniques for assessing this learning.

For example, the chemistry program regularly reviews and discusses learning requirements with 4-year institutions LBHC graduates typically attend. After noting the current requirements and reviewing LBHC course data (e.g., artifacts) demonstrating the required knowledge and skills, LBHC science faculty adjust course level curriculum and assignments and reflect about what changes would better support student learning.



Students working on a lab

All program courses are sequenced with increasing skill needed to complete the following coursework. For example, for the human services (addiction studies and human services option) program of study, the foundational counseling course (HS 232 fundamentals of counseling) uses a module where 15 basic counseling responses are read through and described in class. Students then conduct mock counseling sessions (in real time) demonstrating the 15 basic counseling responses. Finally, there is a “midterm” demonstration of all 15 basic counseling responses in a 10-15 minute mock counseling session. Subsequent classes then build on these foundational counseling skills.

Finally, faculty also simply reflect daily on student work. If they notice students are having challenges grasping the material, faculty adjust teaching and learning activities mid-class or in time for the next class.

## **Moving forward**

By fall 2024, the College will have a more systematic and faculty-driven way to ensure assessment results are used to improve student learning. This past year, faculty had many positive conversations and generated many ideas to improve student learning and these ideas will be implemented in a more substantial way. By the end of fall 2024, LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes.

## **1C7 evidence**

[General education learning outcomes webpage](#)

[Program learning outcomes webpage](#)

[Summary of 2023 and 2024 faculty reflections on program learning outcome and general education learning outcomes assessment](#)



## 1C8. Transfer credit and credit for prior learning

Transfer credit and credit for prior learning is accepted according to clearly defined, widely published, and easily accessible policies that provide adequate safeguards to ensure academic quality. In accepting transfer credit, the receiving institution ensures that such credit accepted is appropriate for its programs and comparable in nature, content, academic rigor, and quality.

LBHC's transfer of credit policies and procedures are outlined on its [admissions webpage](#) (see transfer of college-level credits) and [2023-25 catalog](#) (transfer of college level credits, p. 16; transfer requirements, p. 27; transfer of college level credits, p. 30).

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

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

Students transferring from LBHC to other Montana institutions are advised to meet with an advisor at the respective institution to review transcripts and develop a plan of study. Other considerations in transferring include the application process, formal acceptance, and financial aid applications or other requirements for attending. LBHC tries to align with Montana University System transfer agreements to streamline transfer for LBHC graduates.

The [2023-25 catalog](#) (p. 20) outlines the following procedure for challenging courses: Each department determines the courses which may be challenged. A student who chooses to challenge a course makes a written request to the registrar to challenge the course content, without taking the actual course. Approval of the challenge request is made jointly by the department head and the course instructor. The challenge is a comprehensive examination, which must be passed with a grade equivalent to a "C" or better. The course instructor determines the final grade for the challenge test and the course challenged. The final grade for a challenged course must be submitted by the drop/add deadline in the semester in which the challenge is made. Full tuition and fees are charged for a challenged course.

### Moving forward

LBHC will continue to communicate with other colleges and universities to ensure the transferability of LBHC credits to other institutions as well as other institutions transferring to LBHC.

### 1C8 evidence

[2023-25 catalog](#) (transfer of college level credits, p. 16; challenging courses, p. 20; transfer requirements, p. 27; transfer of college level credits, p. 30).

[Admissions webpage](#) (see transfer of college-level credits)



## 1C9. Graduate programs

The institution's graduate programs are consistent with its mission, are in keeping with the expectations of its respective disciplines and professions, and are described through nomenclature that is appropriate to the levels of graduate and professional degrees offered. The graduate programs differ from undergraduate programs by requiring, among other things, greater: depth of study; demands on student intellectual or creative capacities; knowledge of the literature of the field; and ongoing student engagement in research, scholarship, creative expression, and/or relevant professional practice.

NA. LBHC does not offer graduate programs.



Graduation 2024





## Standard 1D. Student achievement

### 1D1. Admission and orientation

Consistent with its mission, the institution recruits and admits students with the potential to benefit from its educational programs. It orients students to ensure they understand the requirements related to their programs of study and receive timely, useful, and accurate information and advice about relevant academic requirements, including graduation and transfer policies.

**Recruiting and admitting students:** LBHC has an open admissions policy. This means anyone who is a graduate of an accredited high school or has received a HiSET (GED) certificate is eligible for admission. LBHC articulates its policies and procedures regarding admission and placement, and continuation in and termination from its educational programs, including its appeal and re-admission policy, in its 2024-25 Ram-tracker student handbook (placement testing, p. 15) and 2023-25 catalog (academic probation, academic suspension, appeal of suspension, and reinstatement, pp. 24-25; admissions, pp. 26-28; placement testing, p. 28; registration, pp. 29-31).

**Orientation:** The community outreach coordinator presents at local area high schools about the mission of LBHC; its entrance requirements, programs, classes, and cultural activities; the opportunities it provides to schools and communities; and costs. During registration weeks the coordinator provides students with assistance and information to complete their admissions process and apply for financial aid, placement testing, and campus tours. For two days each semester, a new student orientation introduces new students to faculty and staff and what they offer. Based on testing, students are placed in appropriate level coursework.

**Graduation and transfer policies:** Students are required to enroll in a skills for success course, where they learn about navigating college, graduation and transfer policies, and applying for financial aid and scholarships. All students complete a plan of study as a final project. See the 2024-25 Ram-tracker student handbook (transfer assistance, p. 15) and 2023-25 catalog (transfer requirements, p. 27; transfer of college level credits, p. 30; graduation requirements, p. 34) for written procedures.

### Moving forward

Currently, LBHC is creating a part-time position for a retention specialist who will help with recruiting and retaining students to ensure they graduate in a timely manner in their respective program of study. Retention and graduation rate data will be reviewed annually to determine progress and department reflection reports and program review reports will be reviewed to ensure successful goal completion.

### 1D1 evidence

2023-25 catalog (academic probation, academic suspension, appeal of suspension, and reinstatement, pp. 24-25; admissions, pp. 26-28; transfer requirements, p. 27; placement testing, p. 28; registration, pp. 29-31; transfer of college level credits, p. 30; graduation requirements, p. 34)

2024-25 Ram-tracker student handbook (placement testing and transfer assistance, p. 15)



## 1D2. Regional and national peer college data

Consistent with its mission and in the context of and in comparison with regional and national peer institutions, the institution establishes and shares widely a set of indicators for student achievement including, but not limited to, persistence, completion, retention, and postgraduation success. Such indicators of student achievement should be disaggregated by race, ethnicity, age, gender, socioeconomic status, first generation college student, and any other institutionally meaningful categories that may help promote student achievement and close barriers to academic excellence and success (equity gaps).

### In comparison to regional and national peer institutions

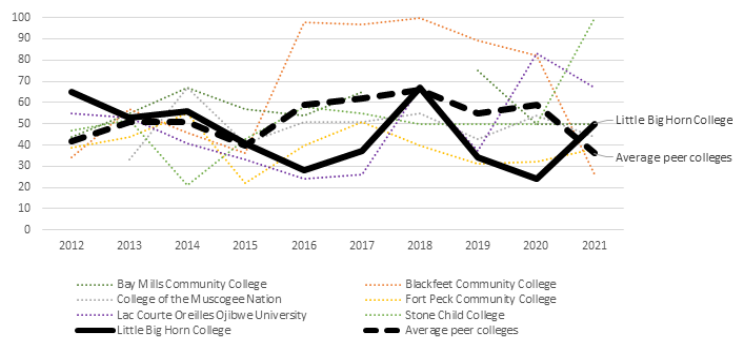
LBHC selected three regional tribal colleges – Blackfeet Community College, Fort Peck Community College, and Stone Child College (all located in Montana) – and three national tribal colleges – Bay Mills Community College (Michigan), College of the Muscogee Nation (Oklahoma), and Lac Courte Oreilles Ojibwe College (Wisconsin) – for peer comparisons. See the [American Indian Higher Education Consortium map](#) for the location of these colleges.

The three regional tribal colleges were chosen from the same state because they are all northern plains tribes within Montana. Though these tribes have unique differences, there are some similarities in the socio-cultural determinants these colleges are exposed to (e.g., funding issues, native vs non-native mix of students, similar enrollment numbers, similar grants, and good networking relationships with these colleges). These colleges were the most similar to LBHC and if LBHC students transfer to another college, it is frequently to one of these three Montana colleges.

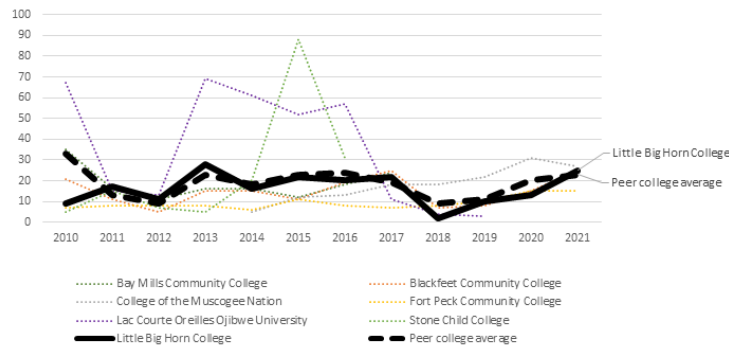
These peer colleges are comparable to LBHC in their mission, size, demographics, and professional-technical/transfer mix. IPEDS was the only available source of data for comparing student achievement with peer colleges. [LBHC's peer college data report](#) includes enrollment, retention, and graduation rate data and is posted on LBHC's [student success data webpage](#).

LBHC's fall-to-fall retention rate is within the lower range and 3-year graduation rate is almost identical to the average of its [peer colleges](#) (see pp. 2-3 or the graphs below). The small student populations at tribal colleges result in fluctuating rates from year-to-year, so LBHC compared itself to the average retention and graduation rates for its peer colleges, which results in more consistent rates.

### Fall-to-fall retention rates for first time full-time students



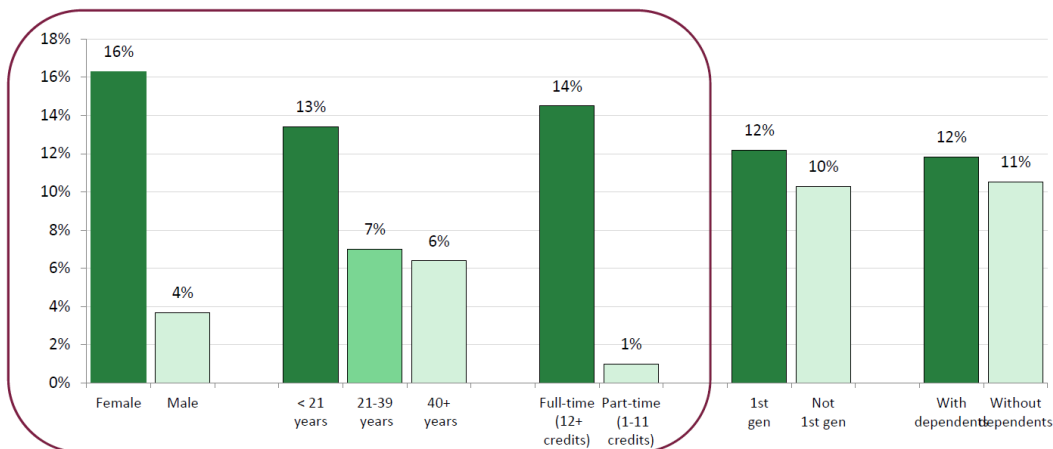
### 3-year graduation rates for first time full-time students



### Student achievement indicators disaggregated

LBHC has posted on its [student success data webpage](#) disaggregated student achievement indicators, some of which are also included in its 2024 mission fulfillment scorecards ([summary](#) and [detailed](#), also see the [scorecard webpage](#)). These disaggregated indicators include [course success rate](#), [fall-to-spring](#) and [fall-to-fall retention rate](#) (see pp. 2-3 for the past 11 years), and [graduation rate data](#) (see pp. 2-3 for the past 9 years). These student achievement indicators are disaggregated by gender, age, full-time/part-time status, first generation status, and with or without dependent status. Achievement gaps are noted in gender (females generally have higher rates than males), age (younger students have higher rates than older students), and full-time/part-time status (full-time students have higher rates) as indicated in this disaggregated average 3-year graduation rate for the last 5 years. Differences in graduation rates were not noted by first generation status and dependent status.

### Disaggregated average 3-year graduation rate for the last 5 years (11%)



Faculty review student achievement data in the [program review report](#) and non-academic departments review student achievement data in the [department reflection report](#) – both of which are annual processes. For more information, see 1D3.



## Next steps

These are examples of next steps faculty noted in the program review process (and other conversations where they were reviewing student success data) to reduce barriers to academic excellence and success (equity gaps): Develop more programs (e.g., trades) that interest males and in fields where there are great needs; offer a male institute to support male students; continue to offer courses during the summer to keep students on track; create a policy or include in the application IEPs and placement tests from high school that follow students to college; and have enrollment goals. Faculty also noted there is a short window for students to graduate, so they need to make all semesters count, keep students' momentum going, and help students to take classes more intentionally so they can graduate in a timely manner. Faculty clarified the FERPA standards regarding instructors consulting with each other to support individual students (i.e., faculty can share information in the student's best interest). While discussing course success rates, faculty agreed that faculty and staff need to consistently withdraw students and, currently, it is unclear who withdraws the student – faculty, staff, or students? If students are not withdrawn, it impacts the students significantly. Faculty would like to continue developing and using experiential learning and would like their student evaluations returned in a timely manner.

Faculty would like to build better morale among the students (e.g., the basketball players impact each other with positive peer pressure); create more spaces for students on campus (e.g., there is not currently a place for students to get food or lounge); offer training on advising (which faculty had in May 2023); map all LBHC processes to improve choke points (e.g., FAFSA); require all students to complete the FAFSA; and increase simulations, experiential, hands-on, and active learning, which helps students learn the material, stay engaged, and be retained.

These are examples of next steps *staff* noted in the department reflection process to reduce barriers to academic excellence and success (equity gaps): Employees can assist in reaching out to the community to enroll; enhance student activities and engagement; use a social media campaign for recruitment; share data with all employees so they can reach out to students or reach out to those who withdrew; encourage every student to be successful; allow for tutors to be available online for students to access remotely; allow students to continue to access classes through an online option; increase accuracy of data entry; provide unique and exciting physical education options; and keep campus clean and safe.

## Moving forward

LBHC will educate its staff on understanding student achievement data – including disaggregated data and peer comparison data – and how to use the data in their work to improve LBHC student success. It also will create a more sustained and meaningful process for using data for continuous improvement to inform planning, decision making, and allocation of resources. The data will be reviewed at the employee orientation annually and the review of these data is embedded in the department reflection reports (staff) and program review process (faculty).

To accomplish these goals, by the end of fall 2024, a student success data committee – including administrators, staff, students, and faculty – will be formed and responsible for ensuring student success data, peer data, scorecards, department reflection process reports, and the strategic plan are used; conversations occur; and next steps are taken to improve student success.



## **1D2 evidence**

2024 scorecards ([summary](#) and [detailed](#)) and [scorecard webpage](#) (2016-17 scorecard report)

[American Indian Higher Education Consortium map](#)

[Course success rate report](#)

[Department reflections webpage](#)

[Fall-to-spring and fall-to-fall retention rate report](#) (pp. 2-3)

[Graduation rate report](#) (pp. 2-3)

[Peer college data report](#) (includes fall-to-fall retention rate and 3-year graduation rates)

[Program review process webpage](#)

[Student success data webpage](#)



### 1D3. Published disaggregated student success data benchmarked against peers

The institution's disaggregated indicators of student achievement should be widely published and available on the institution's website. Such disaggregated indicators should be aligned with meaningful, institutionally identified indicators benchmarked against indicators for peer institutions at the regional and national levels and be used for continuous improvement to inform planning, decision making, and allocation of resources.

LBHC's disaggregated indicators of student achievement – including enrollment, course success, retention, and graduation data – and peer comparison data are posted publicly on LBHC's student success data webpage. These disaggregated data reports are posted on the website and the course success, retention, graduation, and peer comparison data are embedded in LBHC's scorecard (summary and detailed).

Under “student success”, two of LBHC's scorecard objectives – including fall-to-fall retention rate and 3-year graduation rate – include peer comparison data. LBHC's goal for these objectives is that, on average, LBHC is within or higher than the average of its peer tribal colleges. For the last five years, LBHC has been within the average of its peer tribal colleges for fall-to-fall retention and 3-year graduation rate. See the LBHC and its 6 peer colleges report (on the student success data webpage). See 1B2 and 1D2 for more information about LBHC's peer colleges.

LBHC's disaggregated indicators of student achievement are shared with and reviewed and used by faculty and staff.

During the program review process, faculty review and use student success data. In these reports, faculty noted that to reduce barriers to academic excellence and success (equity gaps), LBHC should develop more programs (e.g., trades) that interest males and in fields where there are great needs; offer a male institute to support male students; continue to offer courses during the summer to keep students on track; create a policy or include in the application IEPs and placement tests from high school that follow students to college; and have enrollment goals. Faculty also noted there is a short window for students to graduate, so they need to make all semesters count, keep students' momentum going, and help students to take classes more intentionally so they can graduate in a timely manner. Faculty clarified the FERPA standards regarding instructors consulting with each other to support individual students (i.e., faculty can share information in the student's best interest). While discussing course success rates, faculty agreed that faculty and staff need to consistently withdraw students and, currently, it is unclear who withdraws the student - faculty, staff, or students? If students are not withdrawn, it impacts the students significantly. Faculty would like to continue developing and using experiential learning and would like their student evaluations returned in a timely manner.

The department reflection report requires staff to review and use the student success data. In these reports, staff noted the following next steps: All employees can assist in reaching out to the community to enroll; use a social media campaign for recruitment; share data with all employees so they can reach out to students or reach out to those who withdrew; encourage every student to be successful; allow for tutors to be available online for students to access remotely; allow students to continue to access classes through an online option; increase accuracy of data entry; and keep campus clean and safe.

Both faculty and staff noted that male students struggle, compared to female students, regarding the student achievement measures. As a result, LBHC would like to develop more programs (e.g., trades) that interest males and in fields where there are great needs and, perhaps, offer a male institute to support male students.



## Moving forward

LBHC will educate its staff on understanding student achievement data – including disaggregated data and peer comparison data – and how to use the data in their work to improve LBHC student success. It will also create a more sustained and meaningful process for using data for continuous improvement to inform planning, decision making, and allocation of resources.

To accomplish these goals, by the end of fall 2024, a student success data committee – including administrators, staff, students, and faculty – will be formed and responsible for ensuring student success data, peer data, scorecards, department reflection process reports, and the strategic plan are used; conversations occur; and next steps are taken to improve student success.

## 1D3 evidence

2024 scorecards ([summary](#) and [detailed](#)) and [scorecard webpage](#)

[Course success rate report](#)

[Department reflections webpage](#)

[Enrollment data report](#)

[Fall-to-spring and fall-to-fall retention rate report](#) (pp. 2-3)

[Graduation rate report](#) (pp. 2-3)

[Peer college data report](#) (includes fall-to-fall retention rate and 3-year graduation rates)

[Program review webpage](#)

[Student success data webpage](#)



## 1D4. Transparent process to analyze student success data, mitigating equity gaps

The institution's processes and methodologies for collecting and analyzing indicators of student achievement are transparent and are used to inform and implement strategies and allocate resources to mitigate perceived gaps in achievement and equity.

LBHC's IT staff extract the raw data for the indicators of student achievement from Jenzabar using SQL queries. LBHC contracted outside assistance to clean up the raw data and create user-friendly graphs, tables, and reports. Once the reports were created, they were posted on [LBHC's student success data webpage](#). Word, Excel, and pdf versions of each report are posted on the website so, if there is staff turn-over, the history of creating these data sets can be retraced.

LBHC has a [program review process](#) where faculty review and use student success data to improve their programs. These are examples of next steps faculty noted in the program review process (and other conversations where they were reviewing student success data) to reduce barriers to academic excellence and success (equity gaps): LBHC should develop more programs (e.g., trades) that interest males and in fields where there are great needs; offer a male institute to support male students; continue to offer courses during the summer to keep students on track; create a policy or include in the application IEPs and placement tests from high school that follow students to college; and have enrollment goals. Faculty also noted there is a short window for students to graduate, so they need to make all semesters count, keep students' momentum going, and help students to take classes more intentionally so they can graduate in a timely manner. Faculty clarified the FERPA standards regarding instructors consulting with each other to support individual students (i.e., faculty can share information in the student's best interest). While discussing course success rates, faculty agreed that faculty and staff need to consistently withdraw students and, currently, it is unclear who withdraws the student - faculty, staff, or students? If students are not withdrawn, it impacts the students significantly. Faculty would like to continue developing and using experiential learning and would like their student evaluations returned in a timely manner. See more details in 1D3.

And the [department reflection report](#) requires staff to review and use the student success data. In these reports, staff noted the following next steps: All employees can assist in reaching out to the community to enroll; use a social media campaign for recruitment; share data with all employees so they can reach out to students or reach out to those who withdrew; encourage every student to be successful; allow for tutors to be available online for students to access remotely; allow students to continue to access classes through an online option; increase accuracy of data entry; and keep campus clean and safe. See more details in 1D3.

### Moving forward

The intent in fall 2024 is to document the most important and meaningful set of queries with IT staff and to streamline the process so, moving forward, the assessment/data department or IT staff will be able to annually update the tables, graphs, and reports on the [student success data webpage](#).

### 1D4 evidence

[Department reflections webpage](#)

[Program review webpage](#)

[Student success data webpage](#)





## Conclusion

### a. Key takeaways LBHC would like evaluators and commissioners to focus on

1. LBHC continues to ground its programs and services in the Crow language and cultural ways. The focus on Crow language and culture distinguishes itself from other colleges and LBHC's mission statement is the foundation for everything it does.
2. LBHC has made great progress in its outcomes assessment work (program learning outcomes and general education learning outcomes), curriculum mapping, generation and use of student success data and peer data, program review process, department reflection process, and scorecard data.
3. LBHC has made great strides in understanding and taking ownership of the accreditation process. A decentralization of accreditation responsibilities has led to greater campus wide understanding of each department's role in the accreditation process.
4. The Board of Trustees is newly formed and requires training to effectively fulfill its responsibilities and develop its identity.

### b. Practical next steps to increase institutional capacity, efficiency, and effectiveness

There are several next steps LBHC would like to focus on to increase the efficiency and effectiveness of college processes:

1. LBHC will increase institutional effectiveness by increasing the coherence and alignment of its evaluation and planning processes with its mission statement and strategic plan. For example, regular evaluation and planning processes – such as department reflection, program review, general education learning outcome assessment, program learning outcome assessment, course evaluations, and student surveys – inform college-wide goals and planning. This in-turn informs budgeting and resource allocation, all in the context of the College's mission statement.
2. LBHC will institutionalize and take greater ownership of its systematic evaluation and planning processes. The College's first step is to develop a checklist and timeline for these institutionalized processes. It will also create two committees to oversee these processes and work with and accompany departments and faculty to produce the important discussions necessary to be meaningful to the College and its mission. As first steps, by the end of fall 2024 (1) LBHC will create a committee to oversee the faculty program learning outcome, general education learning outcome, program review, and peer review of distance education processes and (2) LBHC will form a student success data committee – including administrators, staff, students, and faculty – responsible for ensuring student success data, peer data, scorecards, department reflection reports, and the strategic plan are used annually; conversations occur; and next steps are taken to improve student success. The summary department reflection report (pp. 3-8) which aligns the strategic plan objectives with department goals, will be recreated and reviewed annually. All decision-making bodies (including the Board of Trustees) need to review student success data to make institutional decisions.



3. LBHC staff plan to create a shared electronic drive system, so when faculty and staff leave the College, others can access key documents.
4. LBHC staff plan to create an easier method for posting updated information to the website. Currently, the chief information officer is the only person who has access to updating the website and this individual is incredibly busy. Faculty and staff need a way to update the website content in a timely way.
5. LBHC plans to create a set of queries that can be pulled annually and be used to update the student success reports. The intent this fall is to document the most important set of queries with IT staff and to streamline the process so, moving forward, assessment/data department staff will be able to update the tables and graphs annually with a more simplified process.
6. LBHC employees would like training in basic MS Word, Google suite, Cloudram, AI, electronic folder organization, and other technology training.
7. LBHC would like to create a shared calendar system, so employees and students are informed about campus-wide events.



# Addenda



## Addenda

### a. Responses to type 1 findings raised in the year 6 PRFR

Note: A type 1 finding is substantially in compliance, but in need of improvement.

#### 2D1. Accurate communications

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

##### LBHC's original PRFR response

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

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

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

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

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

Finally, the [Ram-tracker student handbook](#) is updated annually in June by the dean of student services.



### **NWCCU's rationale (response to LBHC's original PRFR response)**

Evidence provided was not sufficient to demonstrate that the institution “represents itself clearly, accurately, and consistently through...publications” including “academic intentions, programs, and services to students and to the public.”

Little Big Horn College (LBHC) provided evidence via links to their 2021-23 online catalog (covering academic years 2021-22 and 2022-23). In late September 2023, at the request of the PRFR Panel, NWCCU staff requested LBHC provide their current 2023-25 catalog in accordance with Eligibility Requirement 18 “The institution publishes current and accurate information.” To date, LBHC has not provided the PRFR panel with their 2023-25 catalog.

LBHC's 2023-24 academic year classes began on September 5 prior to the publication of the 2023-25 catalog. The panel expresses concern that prospective and continuing students did not receive clear and accurate information prior to enrolling or attending fall 2023 courses.

Policies and procedures for reviewing published materials are articulated in the faculty handbook and IT policies.

### **LBHC's response to NWCCU's rationale (in year 7)**

The College now has a 2023-25 catalog that is more accurate and consistent with its other publications including the 2024-25 Ram-tracker student handbook, various policies, and the LBHC website.

In August 2023, due to employee turn-over and change of positions, when the PRFR report was submitted the 2023-25 catalog was still being created. It was posted to the website in October 2023. Due to miscommunication, the catalog was not provided to the PRFR team upon request. However, in August 2023, faculty, staff, and students had access to paper copies of the updated catalog during registration and orientation and the paper copies of the catalog were generally distributed from the admissions and registrar's office.

The academic council has the responsibility to oversee the catalog (faculty handbook, p. 5).

The 2023-25 catalog presents programs of study, plans of study, and degree requirements (pp. 39-92). The catalog lists the courses required, when they are offered, and prerequisites (if any). A program of study is mapped out for each student in the designated program, so they can see the sequence of courses they need to take to complete the program in a timely fashion.

The school calendar is published in the 2023-25 catalog (pp. 6-7) and on the website.

### **Updated evidence**

- a. Policies/procedures for reviewing published materials that assures institutional integrity:

2024-25 Ram-tracker student handbook

Catalogs: 2021-23 catalog, 2023-25 catalog (pp. 6-7, pp. 39-92).

Regarding updating the catalog (see the note at the top of the catalog webpage)

Regarding the academic council's responsibility for updating the catalog, see the faculty handbook (academic council, p. 5)

Employee resources webpage (various policies)

IT procedures (review and update of website content, p. 1)

LBHC website (see semester calendar)



## 2G6. Academic advising

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

### **LBHC's original PRFR response**

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

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

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

### **NWCCU's rationale (response to LBHC's original PRFR response)**

Evidence provided suggests the need for improvement of the design, maintenance, and evaluation of "a systematic and effective program of academic advisement." Evidence further suggests the need for clarity of "advising requirements and responsibilities of advisors" particularly in publications provided to students.

The description of academic advising in the PRFR report conflicted with and varied from the evidence provided. The PRFR report indicates that first-year students are offered advising through the student success center. The student handbook indicates that each student is assigned an academic advisor based on major. The 2021-23 catalog states "During new student orientation each student will be assigned an advisor. Students who must take developmental courses will be assigned an advisor in the First-Year Experience Program. Students who can register for college level courses will be assigned a faculty advisor."

Further, the PRFR report indicates that "there is no official evaluation of the advising process..." Recognizing academic advising as an area for improvement, LBHC reports that during summer or fall 2023 the "academic council, faculty, and the student success coordinator plan to reflect together on how to improve advising."

Professional development policies/procedures were general and not specific to academic advisors.



## LBHC's response to NWCCU's rationale (in year 7)

In May 2024, faculty and staff finalized an LBHC advising policy and it is posted on LBHC's employee resources webpage. A student-friendly version of this policy is included in the advising section of the 2023-25 catalog (p. 36) and the 2024-25 Ram-tracker student handbook (p. 13). The policy includes the following documentation of the process:

The first-year experience coordinator advises first-time freshmen during new student orientation. The first-year experience coordinator and the student success coordinator administer placement testing to first-time freshmen. The admissions office provides the first-year experience coordinator with access to the student's high school transcripts and placement testing scores and uses them to determine the student's need for enrollment in developmental courses.

The first-year experience coordinator helps students select courses for their first semester. In selecting courses, they refer to the appropriate sample plan of study in the current LBHC catalog.

New students stay under the supervision of the first-year experience coordinator for their first semester. Students who must enroll in developmental courses have the option to stay with the coordinator through their second semester. New students who enroll in non-developmental courses are assigned a faculty advisor after the first semester based on their signed declaration of major form. The student is reassigned to the appropriate faculty advisor if they choose to change their major.

Returning students meet with their assigned faculty advisors overseeing the student's declared program of study during the faculty member's designated office hours. Faculty advisors also have access to students' high school transcripts and placement testing scores, which are available in the students' admission file.

While students are ultimately responsible for monitoring their academic progress, the student's faculty advisor is responsible for providing guidance to the student in major and course selection. Faculty advisors monitor midterm and end-of-term progress. It is the student's responsibility to schedule meetings with their faculty advisor and to monitor their progress toward course and degree completion. Faculty advisors evaluate the student's grades, attendance, and course selection by referring to the plan of study. In addition, the faculty advisor also informs students of any internship opportunities, school-related information, and/or licensure requirements (when applicable).

Faculty advisors and the returning student begin a plan of study within their first advising meeting.

The dean of students administers the advising survey to students at the end of every semester to evaluate students' experience with advising.

The dean of academics ensures that LBHC provides the faculty with advising and/or advising-related training a minimum of once annually.

*Systematic evaluation of advising:* Starting in summer 2024, the dean of students administered an advising survey to students at the end of the semester to determine students' experience with advising. The dean provides the advising survey student feedback to her staff and to the faculty (advisors). In June 2024, students provided the following feedback about advising: Overall, the students seemed satisfied with the quality of advising and thought that communication with advisors was sufficient – in fact, almost three quarters of the students had met with their advisor



three or more times the previous semester. Some students reported communication was going well, while others reported that it is difficult to get a hold of some faculty and staff.

In July, faculty discussed the student feedback and decided to take the following next steps to improve advising: Faculty noted the importance of ensuring classes transfer; ensuring course times, especially general education classes, do not conflict (e.g., some students seem afraid to leave one class to attend another if classes overlap); ensuring students stay on track with their degree plans; adhering to originally published class listings and schedules; starting classes on time; and exploring potential additional class spaces on campus (e.g., cultural center, AV room).

In July, staff discussed the student feedback and decided to take the following next steps to improve advising: Advising of first-time freshmen will be followed per the [advising policy](#); the students' feedback will be used to know what students need the following semester in terms of advising; and first-time freshmen will be evaluated at the end of the semester.

*Department reflection process:* In May 2024, LBHC created a new department reflection process for its non-academic departments, which is conducted annually. The department reflection report focuses on the department's key accomplishments from the previous year, its goals for the coming year (and the strategic plan objective that relates most closely to each goal), and reflections on student success data (enrollment, retention, and graduation rate). The department reflection report also includes department reflections on areas of strength and challenges and areas for improvement. See the [department reflection process webpage](#) for all submitted 2024 department reflection reports. In the [academics reflection report](#), the faculty noted they would like “advisor training in order to improve completion”.

*Professional development about advising:* According to the updated [advising policy](#), the dean of academics has the responsibility to ensure faculty are provided with advising and/or advising-related training a minimum of once annually. In May 2024, the interim dean of academics conducted advising training for full-time faculty, which included a review of advising documents and a demonstration of advising methods (and the dean followed up with the faculty who were unable to attend the session). A discussion of advising and other academic policies followed the training.

## Updated evidence

- a. Description of advising program, staffing, and advising publications:  
[2023-25 catalog](#) (orientation and advising, pp. 35-36)  
[2024-25 Ram-tracker student handbook](#) (academic advising, p. 13; counseling and student development, p. 14)  
[Advising policy](#) (on the [employee resources webpage](#))  
[Faculty handbook](#) (student advising, p. 10-11)
- b. Systematic evaluation of advising:  
[Academics reflection report](#) (on the [department reflection process webpage](#))  
[Advising survey student feedback](#) (2024)
- c. Professional development policies / procedures for advisors:  
[Advising policy](#)  
[Employee policy and procedure manual](#) (educational leave, p. 27; professional development, pp. 55-56), [faculty handbook](#) (professional development, pp. 19-20), and [professional development agreement for employees on employee resources webpage](#)





## 2G7. Identity verification process for distance education students

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

Note: Institutions should refer to [NWCCU Distance Education Policy](#) for guidance and definitions related to the required evidence.

### LBHC's original PRFR response

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

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

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

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

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

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

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

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



### **NWCCU's rationale (response to LBHC's PRFR response)**

LBHC currently offers 7 courses online and does not assess any additional charge to students enrolled online. Students wishing to enroll in remote/hybrid instruction must complete an application form which outlines the expectations for the student.

Identity verification is accomplished through a) assigned secure usernames and passwords for Cloudram at the point of course registration; b) students are issued LBHC e-mail addresses to access restricted Google Classroom space and are required to attend scheduled instruction periods via Google Meets; c) only LBHC e-mail users are allowed access to digital learning space; and d) given the small student population at LBHC and its use of on-campus, hybrid and online coursework, students are known and recognized by faculty of their selected degree program. Most students take a mixture of course delivery modes, so it is likely that faculty and students have met face-to-face as well as in virtual environments.

NWCCU's request for evidence for meeting federal regular and substantive interaction requirements reflected in NWCCU's Distance Education Policy is addressed in the PRFR report supported with a draft policy "Instructors to Implement Requirements for Regular and Substantive Interaction in Distance Education Courses and Programs." Finalization and implementation of this policy needs to be prioritized.

### **LBHC's response to NWCCU's rationale (in year 7)**

LBHC faculty finalized the distance education policy on May 6, 2024. This policy outlines requirements for regular and substantive interaction between instructors and students. In addition, faculty created a simple evaluation of regular and substantive interaction where (1) the dean of academics, department head, or online faculty conduct a peer review using a checklist of regular and substantive interaction and provide a short reflection using a peer review of substantive and regular interaction in distance education form and (2) instructors who are currently teaching online meet once a semester to share strategies that are working and strategies that could be improved and present findings to the faculty council.

The two primary online instructors met in May 2024 and went through the process outlined above. Their reflections of each other's courses are shared in these reflection reports: BU 241 and SC 132. As a result of the peer review, they determined several next steps to improve distance learning: Faculty plan to add more scheduled meet times, think about alternatives to discussion forums (because they are hit and miss in terms of being able to get students to interact and participate), integrate more simulations to increase student engagement, and use more tools like google video quizzes. They believe a deeper discussion of successes with other faculty will help in terms of building curriculum.



Also, the online instructors consulted with faculty council and came up with the following successful teaching strategies for student engagement in online (hybrid, synchronous, and asynchronous) courses that faculty will try to implement this year:

1. *Office hours*: Set virtual office hours to be available via email and scheduled google meets. The hybrid format allows for in-person study nights where students can meet with instructors.
2. Use *supplemental learning resources* beyond the traditional lecture (in-class, synchronous online, and recorded lectures) such as web-based supplemental learning resources (which can be accessed through the online classroom platform) and supplemental videos (YouTube, book publisher provided videos).
3. Use *interactive online quizzes* (asynchronous quizzes) and assignments to increase student participation outside of lecture times, which has allowed curriculum to be adjusted to increase course content.
4. Provide a place where students can access resources before lecture times (in class / synchronous online). For example, education courses are structured as a flipped classroom, where students read materials before class and take part in participatory activities during class.

LBHC does not charge additional fees for verification procedures. Page 10 of the 2023-25 catalog states, “LBHC does not currently charge additional fees for student verification procedures. In the event LBHC adopts a new ID student verification system, additional charges may be applicable to students.”. Also see the last page of LBHC’s substantive change submission for making programs available via distance education.

#### Updated evidence

- a. Policies/procedures for ensuring the student who registers in a distance education course/program is the same student who participates in the course and receives credit:  
Catalogs: 2021-23 catalog, 2023-25 catalog (admission requirements, p. 26-28)  
Hybrid instruction application form
- b. Policies/procedures make it clear that these processes protect student privacy:  
Catalogs: 2021-23 catalog, 2023-25 catalog (academic dishonesty, p. 21)  
2024-25 Ram-tracker student handbook (student conduct code [including academic misconduct], pp. 20-23; rights and responsibilities of students, pp. 7-8; academic records and privacy of records, p. 10)
- c. Notification to students at the time of registration of any additional charges associated with verification procedures:  
2023-25 catalog (p. 10 says, “LBHC does not currently charge additional fees for student verification procedures. In the event LBHC adopts a new ID student verification system, additional charges may be applicable to students.”)  
Substantive change submission for making programs available via distance education
- d. Academic policies/procedures for instructors to implement requirements for *regular and substantive interaction in distance education* courses/programs:  
Distance education policy (2024)  
Peer review of substantive and regular interaction in distance education: BU 241 and SC 132



## **b. Responses to type 2 findings raised in the year 6 PRFR**

Note: A type 2 finding had insufficient evidence and NWCCU was unable to evaluate (in need of onsite evaluation).

### **2E1. Audit process and financial stability**

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

#### **LBHC's original PRFR response**

LBHC's most recent financial statements and certified audit reports are for the year ending June 2021. The 2021-22 audit is in progress and the hope is to have it be completed by August 31, 2023. For the 2022-23 audit, the goal is to get back on track with the pre-pandemic schedule and have it be available by March 2024. LBHC has an independent certified public accountant audit all financial records. The Board of Trustees approves the appointment of a new independent auditor every three to five years. The professionally qualified personnel perform the annual external financial audit in accordance with generally accepted auditing standards in the United States. The College tries to complete each audit within nine months of the end of the College's fiscal year. Upon completion, the College administration presents the appropriate and comprehensive institutional audit report to the Board of Trustees for review and approval.

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

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

#### **NWCCU's rationale (response to LBHC's original PRFR response)**

Evidence provided was not sufficient to demonstrate that the institution "utilizes relevant audit processes and regular reporting to demonstrate financial stability..."

Little Big Horn College (LBHC) submitted their 2020-21 Audited Financial Statement as evidence of compliance. In late September 2023, at the request of the PRFR Panel, NWCCU staff requested LBHC provide their audited financial statement for 2021-22 in accordance with Eligibility Requirement 20 "The audit is to be completed no later than fifteen months after the end of the fiscal year." To date, LBHC's 2021-22 audited financial statement has not been received. Lacking the 2021-22 audited financial statement, the panel was not able to assess compliance with this standard.



## **LBHC's response to NWCCU's rationale (in year 7)**

LBHC's 2021-22 financial statements and auditor's report were completed on December 16, 2023, and its 2022-23 audited financial statements should be completed by September 30, 2024.

LBHC has an independent certified public accountant audit all financial records. The Board of Trustees approves the appointment of a new independent auditor every three to five years. The professionally qualified personnel perform the annual external financial audit in accordance with generally accepted auditing standards in the United States. The College tries to complete each audit within 12 months of the end of the College's fiscal year. Upon completion, the College administration presents the appropriate and comprehensive institutional audit report to the Board of Trustees for review and approval.

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

As of June 30, 2024, the College was in a stable financial position. LBHC increased its net position from 2021 to 2022 by \$92,000. Investments decreased by approximately \$576,000 due to unrealized losses experienced in portfolio holdings during the year. And tuition and fees were approximately \$731,000 for the year (a decrease of approximately \$158,000 over the previous year).

### **Updated evidence**

1. Policies/procedures that articulate the oversight and management of financial resources:  
2015 financial policies and procedures (description of the budget cycle, p. 12; investment/endowment and reserve funds, pp. 21-22)
2. Latest external financial audit including management letter:  
2021-22 financial statements and auditor's report (management letter, pp. 1-3; management's discussion and analysis, pp. 4-13)
3. Cash flow balance sheets:  
2021-22 financial statements and auditor's report (balance sheet governmental funds, p. 17; statement of cash flows proprietary funds, p. 23)
4. Audited financial statements:  
2021-22 financial statements and auditor's report (pp. 15-23; notes to the financial statements, pp. 25-40)



5. Tuition and fees, educational, and auxiliary revenue for undergraduate and graduate enrollments:  
2021-22 financial statements and auditor's report: statement of revenues, p. 19; student groups and bookstore inventory, p. 39; cafeteria income, p. 39  
2015 financial policies and procedures: adequate checks and balances and separation of duties, p. 5; compliance audits and audited financial statements, p. 11  
LBHC does not have graduate enrollments.
6. Significant contracts/grants:  
2021-22 financial statements and auditor's report: statement of activities for operating grants and contributions, p. 16; restricted cash, p. 17; instruction, institutional support, other governmental funds (contracts and grants), p. 19; due from other governments (grants), p.36; advances from grantors, pp. 15, 17, 29, 37; schedule of expenditures of federal awards, pp. 41-42  
Financial policies and procedures: office of sponsored programs, pp. 23-26
7. Endowment and giving reports:  
2021-22 financial statements and auditor's report: balance sheet, governmental funds, investments heading, p. 17; investments notes, pp. 33-35; endowment note 6, p. 43; investments and endowments, pp. 15, 33, 36, 39; investment notes, pp. 33-35  
Financial policies and procedures: investment/endowment and reserve funds, pp. 21-22; bank accounts, pp. 22-23
8. Investment revenue:  
2021-22 financial statements and auditor's report: investments note 3, pp. 33-35; accrued interest receivable, pp. 15, 20, and 35; graphs of revenue, pp. 9-10; statement of activities, general revenues and transfers, p. 16



## 2E2. Financial planning

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

### LBHC's PRFR response

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

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

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

### NWCCU's rationale (response to LBHC's original PRFR response)

Evidence provided was not sufficient to demonstrate "financial planning includes meaningful opportunities for participation by stakeholders and ensures appropriate available funds, realistic development of financial resources...to ensure short term financial health and long-term financial stability and sustainability."

LBHC provided their Budget Policies and Procedures outlining the roles of the Finance Office, President, President's Council, BOT Finance Committee, and Board of Trustees. These policies/procedures indicate the Finance Office presents monthly budget/expenditure report to President's Council (Board of Trustees?) for review and approval; LBHC provided no documentation as evidence of this practice in the form of minutes, agenda, or budget material. While LBHC provided evidence of one quarterly budget/expenditure report to the Board of Trustees for review and acceptance, that evidence was BOT minutes dated September 29, 2022 (over one year ago) that indicated general approval of the budget but lacked any level of detail regarding planned revenues/expenditures or comparison to prior year. Without sufficient evidence, the panel was unable to assess compliance with this standard.



## **LBHC’s response to NWCCU’s rationale (in year 7)**

By September 2024, LBHC’s finance policy and procedure manual should be revised, which outlines the budgeting process.

At every monthly Board of Trustees meeting, the chief financial officer (CFO, Aldean Good Luck) provides a finance report to the Board for their review. The finance report is a summary of the last month’s financial updates (see the last four months finance reports). The CFO also provides the previous month’s utilities reports (2024, 2023, 2022) and expense report (see tabs with the last 11 years data), which is noted in the Board minutes under the “reports” section (e.g., 10.19.2023, 02.27.2024, 03.20.2024, 05.15.2024).

*Budget advisory committee:* The College also created a more efficient, streamlined, effective, and meaningful process for documenting and approving the annual budget by creating a new budget advisory committee, whose purpose is to create a draft budget for the Board of Trustees to review. The budget advisory committee has representatives from the faculty council, staff council, president’s council, and finance department – each for a 3-year term (see the list of budget advisory committee member names and positions under the heading “updated evidence”). The president and chief finance officer are standing members of the committee. Committee members elect a secretary and chair. The secretary has the responsibility to document the work of the committee with minutes (see 05.16.2024, 06.06.2024, and 07.11.2024), agendas, and budget materials (e.g., three previous fiscal years report, expense report). When the 3-year term is completed, a representative replacement is selected by members of the president’s council, faculty council, and staff council. The finance department has one rotating representative.

Annually, during the spring (March, April, May, and June) the CFO prepares a budget using input from the budget advisory committee. The finance department and the president use financial data from past fiscal years’ audits, the most current Tribal College and University appropriations data, the indirect costs projections for all LBHC grants and contracts, auxiliary services revenue, recognized budget surpluses, and investment/endowment earnings to prepare the budget. The budget advisory committee members compare the draft budget to the actual expenditures from three previous fiscal years as reference points (see the 05.16.2024 minutes where, under 5a, the CFO asked the committee members to review the budget from the past three years, which was provided to them, and the 07.11.2024 minutes, where committee members discussed the past three years budgets). The Board of Trustees approved the draft 2024-25 budget on July 17, 2024.

As of July 31, 2024, the budget advisory committee has had three meetings. The first meeting (see 05.16.2024 minutes) was an orientation reviewing members’ roles on the committee and the purpose of the committee. The second meeting (see 06.06.2024 minutes) focused on budget items for general funds and faculty salaries. And at the third meeting (07.11.2024 minutes), the committee reviewed the previous three fiscal years and agreed on a draft budget for the general fund and tribal college and university budget.





The College follows a budgeting cycle that takes place in the following five steps.

1. The budget advisory committee (BAC) determines the needs of the College.
2. The BAC prepares the budget, based on the president's council input, previous fiscal years, and financial projections.
3. The BAC compares the budget to actual expenditures.
4. The BAC chair presents the budget to the president's council and then to the Board of Trustees for review and recommendations. The BAC modifies the budget as recommended by the Board of Trustees.
5. The Board of Trustees approves the budget.

*Next steps:* By September 2024, LBHC's finance policy and procedure manual should be revised, which outlines the budgeting process. In 2024-25, the College should have a better sense of direction and understanding of the budget and will streamline these steps based on feedback from the budget advisory committee members and others. Also, the budget advisory committee should be able to start preparing next year's budget earlier than this past year.

#### **Updated evidence**

1. Policies or procedures for planning and monitoring of operating and capital budgets, reserves, investments, fundraising, cash management, debt management, transfers and borrowing between funds:

Financial policies and procedures (budget, pp. 11-13)

LBHC does not transfer or borrow between funds.

2. Sample of meeting agendas, minutes, and/or other documentation as evidence of meaningful opportunities for participation by stakeholders:

Board of Trustee meeting minutes (samples): 10.19.2023, 02.27.2024, 03.20.2024, 05.15.2024

Budget advisory committee members and positions: Neva Tall Bear (interim president, BAC chair), Jamie Riley (faculty, BAC secretary), Aldean Good Luck (CFO), Patricia Whiteman (dean of students), Bill Old Crow (registrar), Elden Not Afraid (finance/AP), and Tim McCleary (dean of academics) and Lorna Little Owl (PR/grants) who are unofficial members

Budget advisory committee minutes: 05.16.2024, 06.06.2024, and 07.11.2024

Chief finance officer finance reports to the Board of Trustees (samples): utilities reports (2024, 2023, 2022), expense report, three previous fiscal year's budget reports, and finance reports (last four months summary reports to the Board of Trustees)

Draft 2024-25 budget



## 2F3. Sufficient employees

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

### LBHC's original PRFR response

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

14 full-time faculty, 2 adjunct faculty, and 49 staff.

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

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

### NWCCU's rationale (response to LBHC's original PRFR response)

Evidence provided was not sufficient to demonstrate "the institution employs faculty...sufficient in role, number...to achieve its organizational responsibilities, educational objectives, establish and oversee academic policies, and ensure the integrity and continuity of its academic programs."

The Panel found it difficult to assess the sufficiency of full-time faculty (14) and adjunct faculty (2) based on the evidence provided. As a small institution, the distribution of the faculty among individual programs may provide a more meaningful assessment of the sufficiency of faculty to ensure the integrity and continuity of its academic programs.



### **LBHC's response to NWCCU's rationale (in year 7)**

LBHC has 14 full-time faculty (including the trades), 5 adjunct faculty, 54 staff (including 3 temporary positions), and 6 administrators. The table on the next page shows the number of faculty in each area and the 2023-25 catalog (pp. 116-117) provides details of faculty qualifications.

Currently, overall LBHC has enough staff positions, although the College could use another maintenance and security position. All positions are full, except for one unfilled finance position.

Currently, in terms of faculty, with the addition of adjuncts and some staff teaching courses, the College is able to ensure the basic integrity and continuity of its academic programs; however, there are not enough faculty to support student and course load in some programs. For example, the communication arts (with one faculty teaching 14 courses in 2022-23) and business programs (with one faculty teaching 13 courses in 2022-23) are currently understaffed and the sciences program has been unable to hire a full-time faculty member for the last two years (two faculty are teaching 12 and 13 courses each in 2022-23).

Also, some program faculty (e.g., education) are employed through a professional development grant. Maintaining this grant funding is essential for success in these programs of study.

LBHC recently hired a third full-time Crow studies faculty and so now there are enough instructors for all Crow classes. In the past, there were some Crow courses that were sitting idle, which are now being taught.

Currently, in addiction counseling / human services / psychology, there is a manageable workload for faculty given the student interest; although it would be ideal to have additional support for the clinical practicum.

Mid-spring semester, in February 2024, LBHC tragically lost one of its full-time math faculty members in a car accident. As a result, the College had to scramble to cover these courses.

The table on the following page provides a summary of the full-time and part-time faculty and staff teaching in each program and the enrollments in 2022-23, which supports the statements made above. See more specific details and a breakdown of the number of 3-credit courses in 2022-23 taught in each program by each full-time and part-time faculty and staff and the total number of courses taught by each person in this report.



**Summary of the number of full-time and part-time faculty/staff teaching in each program with 2022-23 enrollments** (including summer and repeat courses)

*Note:* The numbers in parentheses indicate the number of 3-credit courses (duplicated) each full-time faculty or part-time faculty/staff teaches in each discipline.

| Programs courses            | Full-time faculty  | Part-time faculty/staff   | Enrollment (duplicated) |
|-----------------------------|--|---|-------------------------|
| Addiction counseling        | Eric (4), Levi (1)   |   | 19                      |
| Agriculture                 | Sara (2)   | Kurt (1, staff)   | 19                      |
| Anthropology                | Tim (1)  |   | 16                      |
| Building trades             | Garrett (8)  | Tim W (1)   | 79                      |
| Business                    | Jamie (13), Neva (1),<br>Ryan (1), Jonah <sup>3</sup> (1)  |   | 235                     |
| Commercial driver's license | Tucker (4)   |   | 18                      |
| Communications arts         | Gretchen (14)  | Jen (3)   | 280                     |
| Crow studies                | Vance (8), Levi (6), Tim (3),<br>Sharon (1), Neva (1)      | Emerson (2, staff), Lark (2), Kimmy (1),<br>Raphaelle (2), Melodee (1, staff), Tim B (1, staff) | 461                     |
| Education                   | Jacinta (6), Sharon (5)                                    | Raphaelle (2), Trivian (1), Lucy (1),<br>Patricia (1, staff)                                    | 187                     |
| Health and wellness         |  | Darren (1), TR (1), Cheryl (1),<br>Aldean (1, administrator)                                    | 99                      |
| Health education            | Amber (2)  |   |                         |
| Heavy equipment operator    | Tucker (2)   |   | 20                      |
| History studies             | Tim (3)  |   | 46                      |
| Human services              | Eric (5), Gretchen (2),<br>Levi (1)                        |   | 64                      |
| Humanities                  |  | Janine (2), Lark (1), Lucy (1)  | 48                      |
| Information technology      | Ryan (5)   |   |                         |
| Mathematics                 | Dorci (14), Jonah (6), Amber<br>(6), Ryan (2), Garrett (1) |   | 324                     |
| Psychology                  | Eric (6), Amber (2), Levi (1),<br>Sharon (1)               |   | 121                     |
| Science                     | Sara (13), Neva (12),<br>Amber (5)                         | Eric M (5), Emerson (1, staff)  | 416                     |
| Social science              |  | Janine (2)  | 36                      |
| Trades                      | Tucker (6)   |   | 37                      |
| Total                       |  |   | 2,526                   |

<sup>3</sup> Jonah passed away in February 2024.



## Updated evidence

- a. Documentation about engagement and responsibilities specified for faculty and staff, as appropriate:

Employee policy and procedure manual,

Faculty handbook

- b. Personnel hiring policy/procedures:

Employee policy and procedure manual: personnel administration, pp. 39-50; hiring of relatives, p. 47

Faculty handbook: faculty/adjunct criteria, recruitment and appointment for faculty, etc., pp. 23-32

- c. Academic organizational chart:

2023-25 catalog (faculty qualifications, pp. 116-117)

Detailed break-down of courses taught in 2022-23 by faculty and staff report

Organizational chart (updated May 2024)

- d. Administrator/staff/faculty evaluation policies/procedures: Also, see 2.F.4

Employee policy and procedure manual: personnel evaluation, pp. 46-47 (also see the employee 90 working day review form and the staff annual evaluation form)

Faculty handbook: faculty evaluation, pp. 18-20 and student evaluation of teaching form



## 2G2. Current and accurate information in catalog and website

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

### LBHC's original PRFR response

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

### NWCCU's rationale (response to LBHC's original PRFR response)

Evidence provided was not sufficient to demonstrate the “institution publishes in a catalog...current and accurate information...”

Little Big Horn College (LBHC) provided evidence via links to their 2021-23 online catalog (covering academic years 2021-22 and 2022-23) and, in some instances, links to their website. In late September 2023, at the request of the PRFR Panel, NWCCU staff requested LBHC provide their 2023- 25 catalog in accordance with Eligibility Requirement 18 “The institution publishes current and accurate information.” To date, LBHC has not provided the PRFR panel with their 2023-25 catalog.

Via provided weblinks, the PRFR panel was able to sufficiently evaluate compliance for institutional mission; admission requirements and procedures’ rules and regulations for conduct, rights, and responsibilities; tuition, fees, and other program costs; and the academic calendar. Information on opportunities and requirements for financial aid was insufficient as the website mentions the opportunity for scholarships but does not provide information regarding requirements, timelines, etc.

### LBHC's response to NWCCU's rationale (in year 7)

The College now has an updated 2023-25 catalog that is more accurate and consistent with its other publications including the 2024-25 Ram-tracker student handbook, different policies (on the employee resources webpage), and the LBHC website.

In August 2023, due to employee turn-over and change of positions, when the PRFR report was submitted the 2023-25 catalog was still being created. It was posted to the website in October 2023. Due to miscommunication, the catalog was not provided to the PRFR team upon request. However, in August 2023, faculty, staff, and students had access to paper copies of the updated catalog during registration and orientation and the paper copies of the catalog were generally distributed from the admissions and registrar’s office.



The academic council has the responsibility to oversee the catalog ([faculty handbook](#), p. 5).

In May 2024, financial aid staff updated the [financial aid policies and procedures manual](#) for staff, the financial aid information posted on [LBHC’s Cloudram webpage](#) for students, and the financial aid information noted in the [2023-25 catalog](#) (pp. 11-17) for students. The financial aid information is now consistent, accurate, and up to date. LBHC has no deadlines or timeline for submitting FAFSAs. Students can submit FAFSAs until the end of the school year. The only timeline LBHC has is for submitting the American Indian College Fund application. Students and faculty are informed about upcoming deadlines through emails, signs on campus, and Cloudram.

The catalog includes the following updated and accurate information: grading policy (pp. 22-25); information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion (pp. 39-92); course descriptions (pp. 93-115); and names, titles, degrees held, and conferring institutions for administrators and full-time faculty (pp. 116-117).

### Updated evidence

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

- a. Institutional mission: [2023-25 catalog](#) (p. 8), [LBHC website](#)
- b. Admission requirements and procedures: [2023-25 catalog](#) (pp. 26-28)
- c. Grading policy: [2023-25 catalog](#) (pp. 22-25)
- d. Information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion: [2023-25 catalog](#) (pp. 39-115)
- e. Names, titles, degrees held, and conferring institutions for administrators and full-time faculty: [2023-25 catalog](#) (pp. 116-117)
- f. Rules and regulations for conduct, rights, and responsibilities: [2023-25 catalog](#) (statements of academic freedom and non-discrimination, p. 18; privacy of records, p. 33), [2024-25 Ram-tracker student handbook](#) (rights and responsibilities of students, pp. 7-8; privacy of records, p. 10; student conduct code, pp. 20-23)
- g. Tuition, fees, and other program costs: [2023-25 catalog](#) (cost of attendance, p. 10), [cost of attendance webpage](#)
- h. Refund policies and procedures for students who withdraw from enrollment: [2023-25 catalog](#) (calendar, pp. 6-7; tuition refund policy, p. 13; return of federal student aid, Title IV funds, p. 14); [financial aid policies and procedures manual](#) (title IV refunds, pp. 10-12); [financial aid webpage](#) (tuition refund policy, return of federal student aid, title IV funds)
- i. Opportunities and requirements for financial aid: [2023-25 catalog](#) (pp. 11-17), [financial aid webpage](#)
- j. The academic calendar: [2023-25 catalog](#) (pp. 6-7); [LBHC homepage](#) (under “Student resources”, see “semester calendar on CloudRam”)



## 2G3. Accurate communication on legal eligibility requirements for licensure

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

### LBHC's original PRFR response

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

*AA degree in human services (addictions studies option)* ([catalog](#), pp. 67-68) prepares students with the professional, legal, ethical, and cultural aspects of human services counseling with a specific emphasis on addictions counseling. Students graduating with the associates of arts in human services (addiction studies option) will be ready to continue their education at a four-year institution or enter the workforce and begin the [licensed addiction counseling candidate application](#) with the Montana Department of Labor & Industry: Board of Behavioral Health [MCA 37-35-202].

The *AA degree in education, elementary education option* ([catalog](#), pp. 59-60), is designed to ensure students acquire the requisite knowledge and skills for obtaining employment as a paraprofessional educator and/or transfer to a four-year institution to obtain a bachelor's degree in elementary education and/or special education. When students have completed their course work, they can take a state licensure exam called the “class 7 for Crow language and culture teachers”, which allows them to teach in the classrooms. Option 2 is an AA degree in education that allows them to teach as a paraprofessional in the classroom, which meets the required competency by the schools. Option 3 is due to teacher shortages, students that have teaching experience and an AA education degree can qualify for class 2 licensure under emergency or provisional license.

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

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





The *highway construction (1 year certificate)* is designed to help prepare students for successful employment in the construction industry. The truck driving program follows the industry-wide standards and curriculum. The heavy equipment program is designed to provide students with an overview of the industry, laws, regulations, qualifications, preventative maintenance, controls, and basic experiences/skills in the operation of heavy equipment. During the program, students take the necessary state licensure exams in order to attain a class “A” commercial driver’s license ([catalog](#), p. 100). They can later obtain other classes of commercial vehicle operations licenses. For the heavy equipment portion, students can receive stackable credentials for specific heavy equipment through [National Center for Construction Education & Research](#) (NCCER) that allow students to obtain entry-level employment.

#### **NWCCU’s rationale (response to LBHC’s original PRFR response)**

Evidence provided was not sufficient to demonstrate “publications and other written materials that describe educational programs include accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered.”

As indicated in LBHC’s PRFR Report, two degrees and three one-year certificates require some sort of licensure during or after earning an LBHC degree or certificate. Faculty are including in the 2023-25 catalog more detailed licensure information.

Little Big Horn College (LBHC) provided evidence via links to their 2021-23 online catalog (covering academic years 2021-22 and 2022-23). In late September 2023, at the request of the PRFR Panel, NWCCU staff requested LBHC provide their current 2023-25 catalog. To date, LBHC has not provided their 2023-25 catalog; thus, the PRFR Panel is unable to confirm that the 2023-25 catalog contains “more detailed licensure information” to comply with this standard.

#### **LBHC’s response to NWCCU’s rationale (in year 7)**

Evidence is provided to demonstrate “publications and other written materials that describe educational programs include accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered.” The [2023-25 catalog](#) includes more detailed licensure information for the following degrees and one-year certificates that require some sort of licensure during or after earning an LBHC degree or certificate (see updated evidence below).

#### **Updated evidence**

Samples of publications and other written materials that describe (1) accurate information on national and/or state legal eligibility requirements for licensure or entry into an occupation or profession for which education and training are offered and (2) descriptions of unique requirements for employment and advancement in the occupation or profession: See the following pages in the [2023-25 catalog](#):

AA degree in education, early childhood education option: p. 49 (child development associate)

AA degree in education, elementary option: p. 52 (class 7 Crow language and culture license)

AA degree in human services (addictions studies option): p. 55 (licensed addiction counselor)

Certificate in building trades: p. 89 (journeyman license)

Certificate in early childhood education: p. 91 (child development associate credential)

Certificate in highway construction: p. 92 (class A commercial driver’s license)



## 2G4. Financial aid

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

### **LBHC's original PRFR response**

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

### **NWCCU's rationale (response to LBHC's original PRFR response)**

Evidence provided was not sufficient to demonstrate “information regarding the categories of financial assistance (such as scholarships, grants, and loans) is published and made available to prospective and enrolled students.”

Information available on the financial aid website and in the Ram-tracker student handbook appears incomplete. Both sources indicate scholarships are available but do not provide information regarding the requirements, eligibility, deadlines, etc. Additionally, LBHC provided evidence via links to their 2021-23 online catalog (covering academic years 2021-22 and 2022-23). In late September 2023, at the request of the PRFR Panel, NWCCU staff requested LBHC provide their current 2023-25 catalog. To date, LBHC has not provided their 2023-25 catalog. The PRFR Panel is unable to evaluate compliance with this standard, specifically current and accurate information on scholarships.

### **LBHC's response to NWCCU's rationale (in year 7)**

In May 2024, financial aid staff updated the financial aid policies and procedures manual for staff (posted on its employees resources webpage), the financial aid information posted on LBHC's website for students, and the financial aid information in the 2023-25 catalog (pp. 11-17). The financial aid information is now consistent, accurate, and up to date. LBHC does not participate in any student loan programs.

### **Updated evidence**

1. Published financial aid policies/procedures including information about categories of financial assistance: 2023-25 catalog (pp. 11-17), financial aid webpage, 2024-25 Ram-tracker student handbook (p. 11), financial aid policies and procedures manual (pp. 13-15)
2. Information to students regarding repayment obligations: NA. LBHC does not participate in any student loan programs.
3. Policies or procedures for monitoring student loan programs: NA. LBHC does not participate in any student loan program.



### **c. Distance education**

See PRFR finding 2G7 for updated evidence and narrative.

See 1C1 for information that LBHC's distance education programs are consistent with its mission and educational objectives.

See section 1C6 for information that LBHC ensures learning outcomes and levels of student achievement are comparable across modalities.

