



July 17, 2023

Sean Chandler
President
Aaniiih Nakoda College
269 Blackfeet Avenue
Harlem, MT 59526

Dear President Chandler:

Attached please find the Spring 2023 Policies, Regulations, and Financial Review (PRFR) Evaluation Committee's review of Aaniiih Nakoda College. The attached review documents areas where the institution was found to be in compliance with the NWCCU Standards for Accreditation and where additional opportunities for improvement exist. Please note that the Year Seven Evaluation of Institutional Effectiveness (EIE) Evaluation Team will receive a copy of this report, as will the NWCCU Board of Commissioners at your EIE evaluation by the Commission in roughly one year's time.

Please address any areas of needed improvement that the PRFR Evaluation Committee has noted as findings in this report in your EIE self-evaluation. Please feel free to reach out to your NWCCU Staff Liaison if you have further questions.

Findings: None

Future Evaluations

- Year 7 - Evaluation of Institutional Effectiveness Spring 2024

Thank you for your commitment to the process of peer evaluation and continuous quality improvement. If you have questions about any of the information in this letter, please contact your staff liaison, Dr. Selena Grace, at sgrace@nwccu.org.

Sincerely,

Ron Larsen
Senior Vice President

cc: Mr. Scott Friskics, Director of Sponsored Programs
Mr. Robert Adams, Board Chairman
Mr. Clayton Christian, Commissioner of Education, Montana University System



Peer Evaluation for: Aaniiih Nakoda College

Standard 2: Governance, Resources, and Capacity

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

Standard 2.A.1

The institution demonstrates an effective governance structure, with a board(s) or other governing body(ies) composed predominantly of members with no contractual, employment relationship, or personal financial interest with the institution. Such members shall also possess clearly defined authority, roles, and responsibilities. Institutions that are part of a complex system with multiple boards, a centralized board, or related entities shall have, with respect to such boards, written and clearly defined contractual authority, roles, and responsibilities for all entities. In addition, authority and responsibility between the system and the institution is clearly delineated in a written contract, described on its website and in its public documents, and provides the NWCCU accredited institution with sufficient autonomy to fulfill its mission.

Team Verification: Compliant

Evidence:

- Institutional governance policies and procedures **_Y_**
- System governance policies and procedures (if applicable) **_N/A_**
- Multiple board governing policies and procedures (if applicable) **_N/A_**
- Board's calendar for reviewing institutional and board policies and procedures **_Y_**
- Bylaws and Articles of Incorporation referencing governance structure **_Y_**

Rationale:

ANC demonstrates effective governance, with the responsibilities of the Board of Directors and the college administration officers clearly delineated. The Board of Directors meets every month. The policies and procedures manual was provided.

Standard 2.A.2

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

Team Verification: Compliant

Evidence:

- Leadership organizational chart **_Y_**
- Curriculum vitae of executive leadership **_Y_**

Rationale:

In addition to the President, ANC's administrative team consists of a Dean of Academic Affairs, Dean of Students, and Comptroller who are all qualified for their positions and carry out planning, implementing and assessing the institution's programs and services.

Standard 2.A.3

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

Team Verification: Compliant

Evidence:

- Curriculum vitae of President/CEO **_Y_**

Rationale:

ANC is led by Dr. Sean Chandler who holds advanced degrees in educational leadership from the University of Montana and in Native American Studies from Montana State University-Bozeman. He has worked in progressively responsible leadership positions at ANC since 2002.

Standard 2.A.4

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



Team Verification: Compliant

Evidence:

- Institutional governance policies and procedures (see 2.A.1) Y

Rationale:

ANC has documented decision-making processes and structures that include all views. Faculty and staff participate in annual planning retreats and through service on standing committees that address a wide array of institutional policies and procedures. The Student Senate represents the student body and one student representative has a full, voting seat on the Board of Directors.

Standard 2.B.1

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

Team Verification: Compliant

Evidence:

- Academic freedom policies and procedures (evidence could include samples of negotiated agreements with faculty and/or staff, where appropriate) Y
- Evidence that the students also have academic freedom Y

Rationale:

ANC fosters and supports academic freedom for its faculty, as evidenced in the Personnel and Procedures Manual and the Faculty Handbook. The research policy in the PPM specifically includes students as having intellectual freedom.

Standard 2.B.2

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

Team Verification: Compliant

Rationale:

As noted above, ANC clearly supports intellectual freedom. While instructors at ANC are required to include elements of Aaniiih and/or Nakoda lifeways in the curriculum, ANC states clearly that faculty retain the freedom to exercise professional judgment.

Standard 2.C.1

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

Team Verification: Compliant

Evidence:

- Transfer of credit policies and procedures Y

Rationale:

ANC policies for transfer of credit are clearly presented in the Student Handbook and the ANC Catalog. ANC currently has six articulation agreements in place with institutions in Montana and they do participate in the Montana University System Transferability Initiative.

Standard 2.C.2

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

Team Verification: Compliant

Evidence:

Documentation of student's rights and responsibilities policies and procedures, which include:

- Academic honesty Y
- Conduct Y
- Appeals, grievances Y
- Accommodations for persons with disabilities Y

Rationale:

Student rights and responsibilities including academic integrity and codes of conduct, along with accommodation procedures, are clearly presented in the Student Handbook and/or the ANC Catalog, along with grievance procedures.



Standard 2.C.3

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

Team Verification: Compliant

Evidence:

- Policies and procedures for recruiting, admitting, and placing students Y
- Policies/procedures related to continuation and termination from educational programs including appeal process and readmission policies/procedures Y

Rationale:

ANC has an open admission policy and a clear process for evaluating students for placement. Requirements for continuation are clearly presented, along with policies for academic suspension, termination, appeal, and readmission.

Standard 2.C.4

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

Team Verification: Compliant

Evidence:

- Policies/procedures regarding secure retention of student records, (i.e., back-up, confidentiality, release, protection from cybersecurity issues or other emergencies) Y

Rationale:

ANC complies with FERPA and outlined extensive security methods for paper records and electronic ones.

Standard 2.D.1

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.

Team Verification: Compliant

Evidence:

- Policies/procedures for reviewing published materials (print or websites) that assures institutional integrity Y

Rationale:

The ANC Catalog provides detailed information on the institution, its policies and procedures, and the academic programs. It is reviewed and updated annually to maintain accuracy. In addition, ANC maintains the Student Handbook and communicates with the public through newsletters and media. The website is a key information tool, and it is updated continuously according to the IT policies. ANC maintains official social media presence and hosts a public radio station, whose station manager reports to the President.

Standard 2.D.2

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

Team Verification: Compliant

Evidence:

- Policies/procedures for reviewing internal and external complaints and grievances Y

Rationale:

The Personnel Policies and Procedures Manual includes information policies, procedures and codes of conduct that are enforced to ensure high ethical standards. The manual also outlines disciplinary procedures and grievances. Important information is also mirrored in the Board of Directors' manual and the student handbook.

Standard 2.D.3

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



Team Verification: Compliant

Evidence:

- Policies/procedures prohibiting conflict of interests among employees and board members Y

Rationale:

The Personnel Policies and Procedures Manual, the Board of Directors' manual and a financial policies and procedures manual all address this.

Standard 2.E.1

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

Team Verification: Compliant

Evidence:

- Policies/procedures that articulate the oversight and management of financial resources Y
- Latest external financial audit including management letter Y
- Cash flow balance sheets Y
- Audited financial statements Y
- Tuition and fees, educational, and auxiliary revenue for undergraduate and graduate enrollments Y
- Significant contracts/grants Y
- Endowment and giving reports Y
- Investment revenue Y

Rationale:

ANC provided audited financial statements for FY2020, FY2021 and FY2022. The ANC Finance Policies and Procedures Manual is comprehensive and well done.

Standard 2.E.2

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.

Team Verification: Compliant

Evidence:

- Policies / procedures for planning and monitoring of operating and capital budgets, reserves, investments, fundraising, cash management, debt management, transfers and borrowing between funds Y
- Sample of meeting agendas, minutes, and/or other documentation as evidence of meaningful opportunities for participation by stakeholders N

Rationale:

The ANC Finance Policies and Procedures Manual addresses planning and operations for all financial processes and how they are monitored. The Year Seven team may need to explore the absence of agendas, minutes, and documentation in order to demonstrate evidence of stakeholder participation.

Standard 2.E.3

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

Team Verification: Compliant

Evidence:

- Description of internal financial controls Y
- Board approved financial policies, state financial policies, or system financial policies Y

Rationale:

ANC has clearly described internal financial controls and provided Board-approved financial policies.

Standard 2.F.1

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

Team Verification: Compliant

Evidence:

- Human resource policies / procedures Y
- Policies/procedures related to teaching, scholarship, service, and artistic creation Y



- Policies/procedures for appraising employees of working conditions, rights and responsibilities, evaluation, retention, promotion, and termination **_Y_**

Rationale:

ANC provides clear policies and procedures for employees, including rights and responsibilities, employment conditions, evaluation, retention, promotion and termination for faculty and staff in the ANC Personnel Policies and Procedures Manual. The ANC Faculty Handbook includes additional information for instruction personnel.

Standard 2.F.2

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

Team Verification: Compliant

Evidence:

- Employee professional development policies/procedures **_Y_**

Rationale:

The ANC Personnel Policies and Procedures Manual outlines opportunities for professional growth. Professional development is strongly supported by ANC, utilizing a mix of private and federal funding.

Standard 2.F.3

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.

Team Verification: Compliant

Evidence:

- Documentation about engagement and responsibilities specified for faculty and staff, as appropriate **_Y_**
- Personnel hiring policy/procedures **_Y_**
- Academic organizational chart **_Y_**
- Administrator/staff /faculty evaluation policies/procedures **_Y_**

Rationale:

ANC employs sufficient numbers of qualified instructors and competent staff to provide needed services to the student body.

Standard 2.F.4

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

Team Verification: Compliant

Evidence:

- Administrator/staff/faculty evaluation policies/procedures **_Y_**

Rationale:

ANC has clear policies regarding regular evaluation of faculty, staff, and administrators.

Standard 2.G.1

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

Team Verification: Compliant

Evidence:

- Listing of programs and services supporting student learning needs **_Y_**

Rationale:

ANC's Student Services Department provides students with services related to financial aid, admissions, tutoring and co-curricular activities. As is the case throughout ANC's operations, student services are also provided with authentic attention to equity, diversity, and inclusion. Respect is also a cornerstone for ANC in their encouragement of lifelong learning, intergenerational learning, and family involvement.



Standard 2.G.2

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.

Team Verification: Compliant

Evidence:

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

- Institutional mission Y
- Admission requirements and procedures Y
- Grading policy Y
- Information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion Y
- Names, titles, degrees held, and conferring institutions for administrators and full-time faculty Y
- Rules and regulations for conduct, rights, and responsibilities Y
- Tuition, fees, and other program costs Y
- Refund policies and procedures for students who withdraw from enrollment Y
- Opportunities and requirements for financial aid Y
- The academic calendar Y

Rationale:

The ANC Catalog is published annually and is available in print and online. The Catalog clearly addresses and accounts for all of the areas noted above.

Standard 2.G.3

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.

Team Verification: Compliant

Evidence:

Samples of publications and other written materials that describe:

- 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 Y
- Descriptions of unique requirements for employment and advancement in the occupation or profession shall be included in such materials Y

Rationale:

The Catalog includes information about all degree and certificate programs, including name, degree or certificate conferred, program goals, learning outcomes, and requirements, along with information about career opportunities. Information about fields which require certifications or licensure, such as Chemical Dependency Counselling, Nursing, and Welding are presented in detail.

Standard 2.G.4

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.

Team Verification: Compliant

Evidence:

- Published financial aid policies/procedures including information about categories of financial assistance Y
- Information to students regarding repayment obligations Y
- Policies / procedures for monitoring student loan programs Y

Rationale:

Financial Aid policies are included in the Catalog and in the Student Handbook. There is a Financial Aid Officer to assist students. Information about financial assistance is published per requirements.



Standard 2.G.5

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

Team Verification: Compliant

Evidence:

- Published financial aid policies/procedures including information about categories of financial assistance **_Y_**
- Information to students regarding repayment obligations **_Y_**
- Policies / procedures for monitoring student loan programs **_Y_**
- Loan default rate published on website **_N_**

Rationale:

This information is included in both the Catalog and the Student Handbook. Information on Pell and FSEOG grants is also delivered in orientation sessions each semester. ANC does not have a federal student loan program.

Standard 2.G.6

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.

Team Verification: Compliant

Evidence:

- Description of advising program, staffing, and advising publications (Student handbook or Catalog; links to webpages – please note specific pages or areas) **_Y_**
- Systematic evaluation of advising **_N_**
- Professional development policies / procedures for advisors **_Y_**

Rationale:

ANC provides advising in a systematic and effective way, with descriptions and procedures outlined in the Personnel Policies and Procedures Manual, the Faculty Handbook, the ANC Catalog, and the Student Handbook. ANC faculty have developed a draft advising policy that provides best practices and offers evaluation and assessment measures. Data is also gathered for review by the faculty-advisors. The Year Seven team may want to explore the status of the assessment of advising.

Standard 2.G.7

The institution maintains an effective identity verification process for students, including those 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.

Team Verification: Compliant

Evidence:

- 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 **_Y_**
- Policies/procedures make it clear that these processes protect student privacy **_Y_**
- Notification to students at the time of registration of any additional charges associated with verification procedures **_Y_**
- Academic policies/procedures for instructors to implement requirements for *regular and substantive interaction* in distance education courses/programs **_Y_**

Rationale:

ANC employs IT security measures to ensure that students in distance education courses are legitimately and securely participating. Student records are maintained appropriately, and student privacy is protected. Almost all of the distance education courses at ANC are actually hybrid, and face-to-face contact between faculty and students occurs regularly.

Standard 2.H.1

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



Team Verification: Compliant

Evidence:

- Procedures for assessing adequacy of library collections Y
- Library planning committee and procedures for planning and collection development Y
- Library instruction plan; policies/procedures related to the use of library and information resources Y
- Library staffing information; policies/procedures that explains faculty/library partnership for assuring library and information resources are integrated into the learning process Y

Rationale:

ANC offers both a college library and an archive. Covid disrupted in-person operations and the director retired in 2021. The replacement hire is pending at this time. The paraprofessional was able to offer services by appointment in the interim period, and operations will return to normal levels once the new director is in place. ANC provides a good range of physical and electronic collections and ANC participates in the Montana Shared Catalog which provides ANC students with a broad range of materials. The archive holds a robust collection of audio-visual materials, photographs, documents, artifacts and other materials.

Standard 2.I.1

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

Team Verification: Compliant

Evidence:

Facilities master plan, including:

- Equipment replacement policies/procedures Y
- Procedures for assessing sufficiency of physical facilities Y
- Policies and procedures for ensuring accessible, safe, and secure facilities Y
- Policies/procedures for the use, storage, and disposal of hazardous waste Y
- Technology master plan and planning processes Y

Rationale:

ANC has a Physical Plant Policy Manual that covers all of these concerns. Processes are in place for maintaining the physical plant and equipment. The ANC Campus Master Plan establishes priorities for development. The ANC IT Department serves the campus and maintains the Cyberinfrastructure Plan, which is revised annually. The Year Seven team should follow up on how these planning processes are working in practice.

Concluding Comments

ANC provided a very detailed report that provides evidence that the institution is compliant in all areas and should be commended for their hard and comprehensive work.