Haskell Indian Nations University

HLC ID 1778

OPEN PATHWAY: Reaffirmation Review   Review Date: 12/2/2024

Dr. Francis Arpan
President

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Context and Nature of Review

Review Date

12/2/2024

Review Type:
Reaffirmation Review

Scope of Review

- Reaffirmation Review
- Federal Compliance (if applicable)
- On-site Visit
- Multi-campus Visit (if applicable)

There are no forms assigned.

Institutional Context

A five-member peer review team visited Haskell Indian Nations University on December 2 and 3, 2024. The university was welcoming. Indeed, an opening ceremony was held upon the team's arrival on campus. Focus groups were held for all Criteria and meetings with the faculty and the students. The team was also guided on a tour of campus facilities.

Haskell is a unique institution directly under federal control through the Bureau of Indian Education (BIE). The university is not allowed to charge tuition by federal statute; it depends on its direct allocation from the BIE, grants, and Pell scholarships. The university currently has students from 148 tribes and Alaska native villages. The primary funding source for the University comes from direct federal appropriations through the Bureau of Indian Education. Funding for Haskell is defined as forward funded, which guarantees an entire year's worth of financing at the start of the new federal fiscal year. This allows the institution to operate during potential government shutdowns and provides the budget upfront for the academic year. Funding for programming, renovation, construction, and student services is also secured through grants and donations.

Haskell asserts it is the only Tribal college in the world with an entirely Indigenous student population. The university remains committed to its federal trust responsibilities of continuously striving to ensure post-secondary student success. Haskell is responsive to the diverse post-secondary needs of all 574 federally-recognized American Indian Tribes and Alaska Native Villages. The full-time undergraduate headcount in 2024 was 805, and the part-time undergraduate headcount was 73 as reported to HLC in the 2024 Institutional Update.

Haskell has recently added to the full-time faculty for approximately 39 and 20 adjunct faculty. The adjunct faculty work for a university subcontractor rather than directly for the university, and further details are noted in the report.

Leadership at Haskell and executive-level turnover have been recurring issues in the University's recent past. Between the 2019 mid-cycle review and November 2022, Haskell had six presidents (acting, interim, and permanent). In November 2022, a new permanent president was selected. Over the next two years, permanent

deans, vice presidents, and other needed positions have been filled, adding much-needed leadership and stabilizing operations.

Haskell provided documentation of Academic Program Reviews, which was a requirement of an HLC-required embedded monitoring report. Further details are noted in Criterion 4, Core Component 4.A.

Interactions with Constituencies

Monday, December 2, 2024

8:30	8:55	Opening Ceremony	1. President 2. Dean, Natural & Social Science 3. Vice President of Academics 4. IT Contractor 5. IT Supervisor
9:00	9:55	Team meets with the President	President

10:00	10:55	*Open Forum for Criterion 1 and 2	1. Vice President of Academics 2. Dean, College of Business 3. Faculty – Art 4. Dean, Humanities and Arts 5. Director of Institutional Effectiveness 6. Statistician 7. Faculty – HSES 8. IT Supervisor 9. Faculty – American Indian Studies 10. Alcohol & Substance Abuse Counselor 11. Student Rights Specialist 12. Housing Lead 13. Guidance Counselor 14. Dean, Natural & Social Sciences 15. Director of Students Success 16. HINU President 17. Counselor 18. Faculty – College of Business 19. VP Operations 20. Program Support Assistant
11:00	11:55	*Open Forum for Criterion 5	1. Vice President of Operations 2. Facility Manager 3. IT Supervisor 4. Faculty - College of Business 5. Dean, Natural and Social Sciences 6. Dean, College of Business 7. Vice President of Academics 8. Faculty – College of Business 9. Director of Institutional Effectiveness 10. Statistician 11. Faculty – College of Business 12. IT Specialist 13. IT Specialist 14. President 15. Library Supervisor 16. Faculty – Art 17. Dean, Humanities and Arts
12:00	12:55	Lunch with Board of Regents	Ten Board of Regents Members
1:00	1:55	Meet with students	Eleven students

2:00	2:50	*Open Forum for Criterion 3 and 4	1. Faculty – English 2. Dean, College of Education & Health Sciences 3. Student Access Coordinator 4. Faculty – HSES 5. Dean, College of Business 6. IT Supervisor 7. President 8. Faculty – Math 9. Dean College of Humanities & Arts 10. Statistician 11. Recreation Assistant 12. Director of Student Success Center 13. Director of Institutional Effectiveness 14. Faculty – Math 15. Faculty – American Indian Studies 16. Faculty – Math 17. Adjunct Faculty – American Indian Studies 18. Faculty – Theatre 19. Faculty – College of Business 20. Macaulay Brown TRIO 21. Faculty – College of Business 22. Faculty – Arts 23. Faculty – American Indian Studies 24. Faculty HSES
3:15	4:10	Meet with Faculty	23 faculty members
4:15	4:55	Meet with Academic Leadership about Assessment	1. Dean, College of Business 2. Dean, Natural & Social Sciences 3. Dean, Humanities and Arts 4. Vice President of Academics 5. President 6. Dean, College of Education & Health Sciences 7. Director of Institutional Effectiveness

Tuesday, December 3, 2024

8:30 Concurrent Session	9:25	Federal Compliance questions	1. Registrar 2. President 3. Recruitment Specialist 4. Recruitment Specialist 5. Admissions Director 6. Interim Athletic Director 7. Athletics Specialist
8:30 Concurrent Session 10:00 Concurrent Session 8:30 Concurrent Session	9:25 10:55 9:25	**Drop-in session – open to all Federal Compliance questions Campus Tour **Drop-in session – open to all	1. Registrar 2. President 3. Recruitment Specialist 4. Recruitment Specialist 5. Admissions Director 6. Interim Athletic Director 7. Athletics Specialist six individuals Director of the Haskell Cultural Center and Museum six individuals
10:00 Concurrent Session	10:55	Campus Tour	Director of the Haskell Cultural Center and Museum

Start	End	Session	Attendees
8:30 Concurrent Session	9:25	Federal Compliance questions	
8:30 / 11:00 Concurrent Session	11:20 / 9:25	Open Final Meeting to go over process going forward	
10:00 Concurrent Session	10:55	Campus Tour	

1. Faculty – English
2. Recruitment
3. Recruitment
4. Admissions Director
5. Faculty – College of Business
6. Faculty – College of Business
7. Counselor
8. Alcohol & Substance Abuse Counselor
9. Student Rights
10. Administrative Support Assistant
11. Housing
12. Student Access Coordinator
13. Faculty – Math
14. Athletics Specialist
15. Statistician
16. President
17. Dean of Natural & Social Sciences
18. Director of Student Success Center
19. Faculty – NSS
20. Secretary
21. Property & Supply
22. Faculty
23. Director of the Haskell Cultural Center and Museum
24. IT Supervisor
25. Faculty – HSES
26. Faculty – HSES
27. Student Success Coach
28. Faculty – Math
29. Faculty - Math
30. Faculty – English
31. Faculty – Math
32. Faculty – Theatre
33. Faculty – HSES
34. Dean of Education and Health Sciences

(Overlapping secondary list):
1. Registrar
2. President
3. Recruitment Specialist
4. Recruitment Specialist
5. Admissions Director
6. Interim Athletic Director
7. Director GIE

six individuals

| 11:30 | 12:00 | Final meeting with the President | President |

Additional Documents

Link to newspaper article: https://www2.ljworld.com/news/2017/aug/02/judge-dismisses-title-ix-case-against-haskell-indi/

Link to Student Sexual Misconduct Policy: https://haskell.edu/wp-content/uploads/2024/08/20240822-Haskell-Student-Sexual-Misconduct-Policy.pdf

Copy of Attendance Sign-in Sheets with titles

Link to Haskell Indian Nations University – Administrative Investigation Report
January 13, 2023: https://peer.org/wp-content/uploads/2024/04/4_22_24_HINU_investigative_Report.pdf

Link to Statement of Bryan Newland, Assistant Secretary for Indian Affairs, United States Department of the Interior, before the United States House of Representatives, Committee on Natural Resources, Subcommittee on Oversight and Investigations, and Committee on Education and the Workforce, Subcommittee on Higher Education and Workforce Development, Joint Hearing on Safety Issues at Haskell Indian Nations University, July 23, 2024: https://www.doi.gov/ocl/haskell-university-investigation

1 - Mission

The institution's mission is clear and articulated publicly; it guides the institution's operations.

1.A - Core Component 1.A

The institution's mission is articulated publicly and operationalized throughout the institution.

1. The mission was developed through a process suited to the context of the institution.
2. The mission and related statements are current and reference the institution's emphasis on the various aspects of its mission, such as instruction, scholarship, research, application of research, creative works, clinical service, public service, economic development and religious or cultural purpose.
3. The mission and related statements identify the nature, scope and intended constituents of the higher education offerings and services the institution provides.
4. The institution's academic offerings, student support services and enrollment profile are consistent with its stated mission.
5. The institution clearly articulates its mission through public information, such as statements of purpose, vision, values, goals, plans or institutional priorities.

Rating

Met

Rationale

Haskell Indian Nations University adequately demonstrated evidence that its mission is articulated publicly and operationalized throughout the entire institution. The university suggested in the assurance document and in conversations with the university President that the university did not have an inclusive approach to adopting the mission statement in 2021 under an interim President. Starting with the new permanent President in 2022, Haskell has begun updating its mission, vision, and entire strategic plan by utilizing focus groups from internal and external stakeholders as a part of the development and review process. It was clear from the campus visit that faculty and staff believe in and execute daily actions based on the direction of the mission statement. However, they feel the statement needs updating with a better definition of terminology and specific direction. Initial work began, and data were collected from focus groups in the fall of 2024. The process is expected to be completed in 2025, resulting in an updated mission and vision statement, in addition to a strategic plan covering 2026-2030.

As noted in the Assurance Argument, "The mission of Haskell Indian Nations University is to build the leadership capacity of our students by serving as the leading institution of academic excellence, cultural and intellectual prominence, and holistic education that addresses the needs of Indigenous communities." This was adopted in 2014. It was clear that Haskell faculty and staff are passionate about the broader mission, as evidenced by various campus life activities, willingness to go above and

beyond for students, and a clear commitment to building strong Indigenous communities.

A review of the course catalog revealed many courses and programs guided by the university's mission. During the site visit, various cultural learning opportunities and additional evidence of co-curricular activities were discovered, as was an apparent increase in focus on mental health support for students.

Additionally, Haskell clearly articulates its mission through public information. The mission, CIRCLE values, and guiding principles are displayed on the college website and updated signage on campus.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.B - Core Component 1.B

The institution's mission demonstrates commitment to the public good.

1. The institution's actions and decisions demonstrate that its educational role is to serve the public, not solely the institution or any superordinate entity.
2. The institution's educational responsibilities take primacy over other purposes, such as generating financial returns for investors, contributing to a related or parent organization, or supporting external interests.
3. The institution engages with its external constituencies and responds to their needs as its mission and capacity allow.

Rating

Met

Rationale

In the Assurance Argument and during conversations with the president, Haskell argues that the university's charter allows the prioritization of educational goals since the university is not dependent on the generation of credit or research grants.

All programs, agreements, policies, etc., are focused on the mission of serving the tribal communities and the students. Haskell's adoption of the education role to the public good is evidenced in a vision statement that states, "Haskell is a unique and diverse inter-tribal university committed to the advancement of sovereignty, self-determination, and the inherent rights of tribes." Further evidence of Haskell's orientation for the public good can be found in the mission statement, which states, "The mission of Haskell Indian Nations University is to build the leadership capacity of our students by serving as the leading institution of academic excellence, cultural and intellectual prominence, and holistic education that addresses the needs of Indigenous communities."

In many campus conversations during the visit, faculty, staff, and administration reaffirmed their priority to be an educational institution first and foremost. They recognized many challenges with the university's current structure as a federal institution in governance and reporting as they strive to be an academic institution first and foremost. Haskell focuses on constituents that include all members of federally recognized American Indian tribes and Alaska Native villages and descendants that meet the eligibility criteria.

The Haskell National Board of Regents advises the university. The Assurance Argument cited many examples of the institution engaging external agencies and responding to their needs and mutually aligned goals. Haskell, of course, maintains a strong working relationship with the University of Kansas (KU), located in the same city. The relationship is evident in a new Memorandum of Understanding (MOU) with KU that identifies solid relationships with the SLOAN program, which encourages and helps provide a pathway for Haskell students into STEM graduate programs. Other MOUs also show strong partnerships, including an active MOU with the College of the Muscogee Nation, an articulation agreement with Nebraska Indian Community College, and agreements with

the Environmental Protection Agency and the Small Business Administration. Locally, Haskell has strong relationships with the Lawrence community. Haskell has an MOU with the city regarding police services.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.C - Core Component 1.C

The institution provides opportunities for civic engagement in a diverse, multicultural society and globally connected world, as appropriate within its mission and for the constituencies it serves.

1. The institution encourages curricular or cocurricular activities that prepare students for informed citizenship and workplace success.
2. The institution's processes and activities demonstrate inclusive and equitable treatment of diverse populations.
3. The institution fosters a climate of respect among all students, faculty, staff and administrators from a range of diverse backgrounds, ideas and perspectives.

Rating

Met

Rationale

Haskell has demonstrated a strong commitment to preparing its students for a diverse and global world. The Assurance Argument suggests that the university's academic programs emphasize empowerment, advocacy, leadership, and self-determination for Indigenous peoples. Academic offerings and co-curricular activities incorporate opportunities for civic engagement, research, and future tribal leadership development.

Haskell graduates should reasonably be expected to have the skills and knowledge necessary to contribute meaningfully to their communities and beyond. A strong, renewed focus on the assessment of student learning outcomes must be developed to ensure graduates have the knowledge and skills in this area, as it is essential to the university's mission.

The university's dedication to diversity and inclusion is evident in its everyday work, as seen in cultural events, course offerings, mission, and value statements. The Haskell CIRCLE Institutional Values provide a foundation for a respectful and inclusive campus environment. The college also recently established a strong LGBTQIA group that meets weekly as students and staff.

The visit additionally found a great deal of support and movement with expanded mental health services in cooperation with the Bureau of Indian Health Services. Staff, faculty, and students all provided evidence for a supportive and inclusive campus culture with a few exceptions noted in Criterion 3.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

1.S - Criterion 1 - Summary

The institution's mission is clear and articulated publicly; it guides the institution's operations.

Rationale

Haskell adequately demonstrated evidence that its mission is articulated publicly and operationalized throughout the institution. The university displays its mission on campus and on the website. The mission and related CIRCLE Value statements clearly identify the nature, scope, and intended constituents of the institution's higher education offerings and services. The HLC team visited with faculty, staff, administration, and board members, all of who expressed deep appreciation for and commitment to the university and the impact it has on the larger community of Indigenous people. The current plan is underway to renew, redefine, and reimagine the strategic plan, mission, and value statements. This will likely further strengthen the university's long, impactful history of strengthening tribal communities and developing future leaders.

2 - Integrity: Ethical and Responsible Conduct

The institution acts with integrity; its conduct is ethical and responsible.

2.A - Core Component 2.A

The institution establishes and follows policies and processes to ensure fair and ethical behavior on the part of its governing board, administration, faculty and staff.

1. The institution develops and the governing board adopts the mission.
2. The institution operates with integrity in its financial, academic, human resources and auxiliary functions.

Rating

Not Met

Rationale

Haskell Indian Nations University (HINU) is unique as it is a federal institution directly under the Bureau of Indian Education. The university's President reports directly to the Director of the Bureau. A Board of Regents functions in an advisory capacity without direct authority over the institution. The Board of Regents stands alone as a separate 501(c)(3) funded by the university. This board participates in student recruitment and fundraising activities on behalf of Haskell. It is not clear how university ethical practices and related training are communicated, tracked, and enforced with regard to the board.

There is no evidence that specific training on ethical marketing is provided for people who work directly with potential students to provide information regarding the institution. Haskell has recruiters and financial aid staff who should be required to complete this training. Some Board of Regents members are also involved in recruitment efforts and must undergo the required ethical marketing training.

Human resources policies and procedures also fall under federal guidelines. All direct employees of the university are federal employees; in addition, it is unclear if faculty and staff are aware of ethical requirements related to their specific positions. Others, such as adjunct faculty, are hired through a third-party contractor. The contractor, Chenega IT Enterprise Services, LLC, is contracted through the BIE's Indian Education Acquisition Office, located in Albuquerque, New Mexico. The contract specifies that Chenega is to provide an "Indefinite Quantity for Haskell Indian Nations University Part-Time Adjunct Instructor Services."

The university president assured the team that Chenega works closely with the institution to meet credentialing requirements and to ensure that their practices are followed. An example was given of an adjunct faculty member who was not meeting expectations, and the university wished to not offer

that specific individual contracts after a specified semester. Chenega complied with the university's request**.** It should be noted that Haskell has failed to apply for Substantive Change: Contractual Arrangements approval and must do so in relation to their adjunct faculty contractor. Additional information is noted in Core Component 3.C.

While Haskell is under direct federal control and is subject to all related federal statutes, policies, and procedures, it is unclear how employees are trained to ensure they are followed. It was not clear that there are on-campus safeguards for either federal policy compliance or institutional policy compliance. It is not clear how policies are communicated and tracked.

Student safety and security on campus is a significant issue for the university. Students at Haskell described various concerns about their safety on campus, both in person and in the student survey. The university president provided the review team with a link to an article from the Lawrence Journal on August 2, 2017 (the link is included in the Addendum tab) regarding the institution's court case regarding student safety.

On January 13, 2023, in response to numerous complaints made by students and current and former employees of HINU, the United States Department of the Interior, Bureau of Indian Education, Personnel Security Office issued a report (BIE report) of its investigation into the complaints it received from students and university staff. The report provided numerous examples of unethical behavior on the part of Haskell faculty and staff in regard to student safety.

Haskell Indian Nations University has a policy on student complaints that was approved in 2015. The policy indicates that it does not apply to academic issues, including faculty concerns, student grievances, or other program-specific policies. Complaints are sent to the Vice President of University Services, and that office also tracks complaints and actions.

Areas receiving complaints not covered by the formal policy must submit data to the VP's office for tracking purposes. It is not clear that this process is being followed as no data were provided. Several complaints about faculty or programs were included in the Student Survey.

The BIE report on page 40 states, "HINU does not have a centralized location to house policies and procedures that are accessible by all." When the university website was searched, a University PolicyStat page was located; however, it is unclear if faculty and staff are aware of the repository. It is located on the website, several layers deep, and difficult to find. While there is a link to "PolicyStat" at the very bottom of the main university webpage, it is evidently not clear to students what "policystat" means. Adherence to these policies has been problematic, as noted in the BIE report.

The Vice President of Academics manages the relationship between the university and the faculty senate. This was reported to be genial and cooperative during the faculty session and by the academic leadership. According to the president, Haskell faculty and the university have a flexible collective bargaining agreement (CBA) as they are a subset of a much larger union of federal employees. Little, if any, stipulations specifically related to higher education fall within the CBA as it covers around 5,000 federal employees across multiple agencies..

For these reasons, the team finds Core Component 2.A to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirements to be Not Met:

- Assumed Practice A.3 (*"The institution provides its students, administrators, faculty, and staff with policies and procedures informing them of their rights and responsibilities within the institution."*)

- Assumed Practice A.4 *("The institution establishes and publicizes clear procedures for receiving complaints from students and other constituencies, responding to complaints in a timely manner, and analyzing complaints to improve its processes.")*

- Federal Compliance Requirement A.10.030, Institutional Records of Student Complaints ("*An institution shall be able to demonstrate that it keeps an account of the student complaints it has received, including its processing of those complaints, and how that processing comports with the institution's policies and procedures on the handling of grievances or complaints."*)

- Federal Compliance Requirement A.20.020, Recruiting, Admissions and Related Enrollment Practices **(**"*the institution should provide oversight to ensure that the appropriate staff and board members are provided with ethical marketing training"*)

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.B - Core Component 2.B

The institution presents itself clearly and completely to its students and to the public.

1. The institution ensures the accuracy of any representations it makes regarding academic offerings, requirements, faculty and staff, costs to students, governance structure and accreditation relationships.
2. The institution ensures evidence is available to support any claims it makes regarding its contributions to the educational experience through research, community engagement, experiential learning, religious or spiritual purpose and economic development.

Rating

Met With Concerns

Rationale

Based on the review by the HLC team, Haskell generally presents itself clearly to the public on its website and related publications. Most federally required information is present, including consumer disclosure, Clery reporting, accreditation, and eligibility requirements. Due to recent changes in Department of the Interior guidelines for persons to receive benefits meant for Native populations, Haskell is working to clarify language regarding descendency-related eligibility. The university provides many opportunities for culturally rich experiences, for example, two powwows each year.

Due to Haskell's unique status as a federal institution, the Board of Regents is strictly an advisory board. The board has no legal or fiduciary responsibilities; rather, they are a stand-alone 501(c)(3) non-profit organization. According to the Assurance Argument, they are able to "maintain an independence that a federal entity does not enjoy." In addition to advising the university, their primary role is lobbying for federal support; hence, they meet once a year in Washington, D.C. It consists of representatives of the twelve regions of the Bureau of Indian Affairs, a student representative, the Four Tribes of Kansas, and the Haskell Alumni Association. In the session held by the HLC team, board members indicated strong support for the university. They function to convey the needs of the tribal entities in their respective regions and to promote the opportunities provided for university education.

The budget for the Haskell National Board of Regents comes from the university and is regulated by BIE policy for board spending. Haskell and the Board's relationship is governed through an MOU. The university website does not publicly document the nature of the relationship, nor does the 2024-2025 Academic Catalog. Additionally, the website does not document the direct control relationship by the Bureau of Indian Education.

Haskell must also disclose clear and complete information to stakeholders about the relationship with the third-party provider of instruction Chenega.

For these reasons, the team finds Core Component 2.B to be Met with Concerns.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- **Assumed Practice A.5.g** (*"The institution makes readily available to students and to the general public clear and complete information including: …its relationship with any parent organization (corporation, hospital, or church, or other entity that owns the institution) and any external providers of its instruction."*)

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.C - Core Component 2.C

The governing board of the institution is autonomous to make decisions in the best interest of the institution in compliance with board policies and to ensure the institution's integrity.

1. The governing board is trained and knowledgeable so that it makes informed decisions with respect to the institution's financial and academic policies and practices; the board meets its legal and fiduciary responsibilities.
2. The governing board's deliberations reflect priorities to preserve and enhance the institution.
3. The governing board reviews the reasonable and relevant interests of the institution's internal and external constituencies during its decision-making deliberations.
4. The governing board preserves its independence from undue influence on the part of donors, elected officials, ownership interests or other external parties.
5. The governing board delegates day-to-day management of the institution to the institution's administration and expects the institution's faculty to oversee academic matters.

Rating

Not Met

Rationale

The BIE fulfills most of the oversight requirements of Core Component 2.C. As mentioned in Core Component 2.A and the BIE report, Haskell has had recent issues where federal rules and regulations were not followed. While control of the university rests with the Bureau, nevertheless, the university has not consistently followed federal rules and regulations; therefore, for this reason and the reasons detailed below, Core Component 2.C is Not Met.

While the Assurance Argument indicates that the budget for the Board of Regents comes from the university and that the board must follow federal guidelines related to spending, it is not clear how university ethical practices and related training are communicated, tracked, and enforced with regard to the board since the only board training mentioned in the Assurance Argument was provided by the American Indian Higher Education Consortium (AIHEC).

Since the Board of Regents is strictly advisory, it is possible that many of the failures to follow regulations and policies could have been avoided through closer oversight. Haskell administration has expressed that they intend to pursue a congressional charter wherein they come out from under direct BIE control and stand alone as an institution with an appropriately responsible governing board. With either structure, closer oversight of the university's ability to comply with regulations and policies is clearly needed.

For these reasons, the team finds Core Component 2.C to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Federal Compliance Requirement A.20.020, Recruiting, Admissions and Related Enrollment Practices (*"the institution should provide oversight to ensure that the appropriate staff and board members are provided with ethical marketing training"*)

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.D - Core Component 2.D

The institution is committed to academic freedom and freedom of expression in the pursuit of truth in teaching and learning.

Rating

Met

Rationale

As described in the Assurance Argument, while the university is under federal control, the Haskell leadership is committed to academic freedom and freedom of expression. This is evident in its academic freedom policy, which promotes the free expression of thought and ensures procedures exist for that free expression. The academic freedom policy additionally coincides with the DOI Ethics Policies.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.E - Core Component 2.E

The institution's policies and procedures call for responsible acquisition, discovery and application of knowledge by its faculty, staff and students.

1. Institutions supporting basic and applied research maintain professional standards and provide oversight ensuring regulatory compliance, ethical behavior and fiscal accountability.
2. The institution provides effective support services to ensure the integrity of research and scholarly practice conducted by its faculty, staff and students.
3. The institution provides students guidance in the ethics of research and use of information resources.
4. The institution enforces policies on academic honesty and integrity.

Rating

Met

Rationale

According to the Assurance Argument and evidenced by conversations with the faculty, Haskell is, first and foremost, a teaching and learning university. Central to the university's mission is the education and growth of its Native students. The university has adopted its CIRCLE values, which include Integrity and Excellence.

Research at the university has been identified area for growth. The campus is adjacent to a wetlands area, and ongoing studies are based on courses in the Environmental Science program. Stewardship of tribal lands related to cultural values is an essential facet of this program. The research is supported through grants and is conducted in partnership with several other institutions. The university has an Institutional Research Board that supports these efforts and a Grants Manager to ensure the appropriate allocation of resources.

The Student Code of Conduct and the Academic Catalog govern general conduct for students. The Student Code of Conduct was recently updated, and the new version took effect for the fall 2024 semester. Violations and appeals are covered, and the process is administered by academic leadership. However, violations of academic integrity are governed by two separate policies/procedures found in the University PolicyStat pages: Academic Integrity and Misconduct, and the Academic Appeals Procedures.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

2.S - Criterion 2 - Summary

The institution acts with integrity; its conduct is ethical and responsible.

Rationale

According to the Assurance Argument and verified by the HLC team, Haskell operates as a federal institution directly under the Bureau of Indian Education. (BIE) Therefore, the university must adhere to federal ethics rules and regulations. Based on the review team's findings, numerous examples of failure to follow federal rules and regulations were found during the review of the Argument, as well as during on-campus interviews, the student survey, and the BIE report.

While both federal and university policies have specific guidelines for ethical behavior, it was not clear that there are on-campus safeguards for either federal policy compliance or institutional policy compliance, as evidenced by the BIE report. It is not clear how policies are communicated and tracked (except when under revision or development) as no evidence of training for faculty and staff was provided, nor were there specifics about the types of job-related training completed, rather the Assurance Argument simply made an assertion.

Recent federal decisions and institutional policies and practices regarding student safety need to be addressed by the institution. While various policies and procedures are in place to guide student conduct and academic integrity, there is no evidence that students are provided information regarding them or how to locate these policies and procedures.

Institutional policy and federal requirements related to the management of student complaints are not being followed as evidenced by the BIE report and on-campus interviews.

3 - Teaching and Learning: Quality, Resources and Support

The institution provides quality education, wherever and however its offerings are delivered.

3.A - Core Component 3.A

The rigor of the institution's academic offerings is appropriate to higher education.

1. Courses and programs are current and require levels of student performance appropriate to the credential awarded.
2. The institution articulates and differentiates learning goals for its undergraduate, graduate, post-baccalaureate, post-graduate and certificate programs.
3. The institution's program quality and learning goals are consistent across all modes of delivery and all locations (on the main campus, at additional locations, by distance delivery, as dual credit, through contractual or consortial arrangements, or any other modality).

Rating

Not Met

Rationale

Haskell offers four bachelor's degrees, nine associate degrees, and two certificate programs. The institution has policies and processes to ensure courses and programs are current; specifically, department faculty, deans, the Faculty Senate's Curriculum Committee, and the VPA review new course and program changes. The faculty handbook and bylaws describe the process, verified by conversations on campus with faculty.

Haskell articulates learning goals for its programs in the Faculty and Curriculum Committee Handbook and differentiates goals for its various degree program levels. The associate's and baccalaureate degrees require 36-38 credit hours of general education, with Bachelor's degree programs requiring 120 credit hours total and associate degrees requiring 60 credit hours total. The two certificates each require 14-15 credits. Haskell has course and program learning outcomes that are articulated and appropriate for certificate, associate, and Baccalaureate level education. There are four institutional Learner Outcomes (ILOs) in which all graduates are expected to demonstrate competence. The ILOs and program learning outcomes are published in the 2024-2025 academic catalog and are accessible on the Haskell website.

A review of syllabi shows that course learning outcomes are communicated on them, reflecting learning goals at different levels of achievement appropriate to the degree. However, the program learning outcomes were not included in the reviewed syllabi. During the visit, the team did note some confusion between course objectives and course learning outcomes (CLOs) among faculty. Haskell would benefit from clarifying course leaning outcomes on their syllabi. Additionally, it would benefit students if program learning outcomes (PLOs) were mapped to courses and relevant PLOs were

included on syllabi.

Current syllabi were reviewed and revealed to be consistent across courses and delivery (online and in-person). At the time of the visit a Director of Distance Learning position had been approved but was unfilled due to a temporary hold until the new strategic plan is completed. There does not appear to be an individual(s) in charge of distance education courses to ensure quality and compliance among both full-time and adjunct faculty members. The Assurance Argument provided a link to a draft course for instructors teaching online; however, it has not been implemented.

The university provided no evidence for how they ensured that the quality of online teaching is equivalent to the quality of in-person instruction. Student success, defined as A-B-C-Pass rates, were not provided for either type of instruction; they are one metric that may be used to ensure quality. Some program reviews mentioned DFW rates; however, they were not separated by type of delivery (in-person vs. online). Haskell could also provide data related to the direct assessment of course outcomes that compare online student achievement of learning outcomes to on-ground student achievement. Evidence of faculty evaluations of teaching (and related improvement plans) in online courses that specifically emphasize appropriate criteria for online instruction would also help to ensure quality.

The students who were interviewed expressed dissatisfaction that courses with more "rigor" are only offered online (Physics II) and are taught by adjunct faculty. They expressed that they felt they would be more successful with in-person classes taught by full-time faculty. Ensuring that faculty who teach online are adequately qualified specifically for online instruction will be crucial for Haskell to meet this core component.

When questioned, there was no evidence of specific training for faculty on how to teach online or how to meet the HLC expectations and federal regulations of RSI requirements present in the Assurance Argument or in on-campus discussions. Haskell must ensure the quality of its online courses, taught by either full-time or adjunct faculty members. Thus, the review team finds that Haskell does not meet the requirement for ensuring quality across all modes of course delivery.

Haskell does not offer dual credit or have additional locations.

For these reasons, the team finds Core Component 3.A to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Assumed Practice B.2.b.ii (*"Faculty participate substantially in…assurance of consistency in the level and quality of instruction and in the expectations of student performance."*)

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.B - Core Component 3.B

The institution offers programs that engage students in collecting, analyzing and communicating information; in mastering modes of intellectual inquiry or creative work; and in developing skills adaptable to changing environments.

1. The general education program is appropriate to the mission, educational offerings and degree levels of the institution. The institution articulates the purposes, content and intended learning outcomes of its undergraduate general education requirements.
2. The program of general education is grounded in a philosophy or framework developed by the institution or adopted from an established framework. It imparts broad knowledge and intellectual concepts to students and develops skills and attitudes that the institution believes every college-educated person should possess.
3. The education offered by the institution recognizes the human and cultural diversity and provides students with growth opportunities and lifelong skills to live and work in a multicultural world.
4. The faculty and students contribute to scholarship, creative work and the discovery of knowledge to the extent appropriate to their offerings and the institution's mission.

Rating

Met

Rationale

Haskell offers a broad general education that aligns with the institution's CIRCLE values (Communication, Integrity, Collaboration, Leadership, and Respect). Four general education outcomes include Oral and Written Communication, Quantitative and Qualitative Information and Reasoning, Historical and Cultural Forces, and Wellness. The faculty reported familiarity with the general education outcomes, but the team did not see evidence of this alignment with course outcomes. The university is strongly encouraged to map program learning outcomes to course outcomes via a curriculum mapping process. This would show the alignment of outcomes and help to ensure that students have ample opportunities to achieve the required PLOs. This alignment is also imperative for program-level assessment. See also Core Component 4.B where this is addressed more specifically.

Haskell requires that students take courses that teach them to communicate effectively and identify and use information to develop and support written arguments. The English department rubrics and syllabi for required writing and communication courses demonstrated this. The Assurance Argument identified several courses that included research assignments related to the needs of Indigenous communities.

Haskell fosters respectful collaboration between diverse groups of people. The Indigenous community has significant tribal diversity, and Haskell is a window into the rich tapestry of these diverse communities. Members of Haskell's Board of Regents represent regional tribes that have different histories, cultures, and languages. At Haskell, tribal members work together to better their respective

communities. The website, catalog, and campus buildings are filled with students' art from multiple reservations, collaborating and exploring learning.

Throughout the visit, the administration, faculty, and staff referenced the nearly 150 tribal nations that are represented in their student population. The team observed sufficient evidence that Haskell creates a nurturing place for students. During the student dialogue, a particular student spoke about attending a "mainstream" college that was too big and how she feels like Haskell is a much better "fit." Another student expressed how, despite personal past issues, she has been able to thrive at Haskell because of the faculty's support. She is now a senior completing her bachelor's degree. This is contrasted with several comments in the student survey related to perceived disrespect by faculty members.

Multiple examples of scientific and creative student work that ranged from participation in nationally recognized science inquiry (American Indian Science and Engineering Society) to involvement in the American Indian Higher Education Consortium competitions were shared during faculty interviews. Haskell reports robust programming involving grants that range from Department of Education Title III to the National Science Foundation – Coastal Hub to the Kansas National Space Consortium. Examples of student involvement in research were provided. On the campus tour, the team saw additional evidence of scholarly and creative work opportunities for students, such as the canoes and greenhouse.

Faculty reported their deans encouraged them to identify professional conferences, classes, or other scholarly activities that they plan to attend during the year so they could include the dates on their syllabi. There was strong evidence that Haskell provides opportunities for student and faculty exploration and growth.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.C - Core Component 3.C

The institution has the faculty and staff needed for effective, high-quality programs and student services.

1. The institution strives to ensure that the overall composition of its faculty and staff reflects human diversity as appropriate within its mission and for the constituencies it serves.
2. The institution has sufficient numbers and continuity of faculty members to carry out both the classroom and the non-classroom roles of faculty, including oversight of the curriculum and expectations for student performance, assessment of student learning, and establishment of academic credentials for instructional staff.
3. All instructors are appropriately qualified, including those in dual credit, contractual and consortial offerings.
4. Instructors are evaluated regularly in accordance with established institutional policies and procedures.
5. The institution has processes and resources for assuring that instructors are current in their disciplines and adept in their teaching roles; it supports their professional development.
6. Instructors are accessible for student inquiry.
7. Staff members providing student support services, such as tutoring, financial aid advising, academic advising and cocurricular activities, are appropriately qualified, trained and supported in their professional development.

Rating

Not Met

Rationale

Students must be enrolled members or qualified descendants of federally recognized tribes to be accepted for admission to the university. The university follows hiring practices related to Indian preference as mandated by federal law.

Haskell employs 39 full-time and 20 adjunct (part-time) faculty for 974 students, with 70% of the faculty at full-time status and an 18:1 student-to-faculty ratio. A third-party contractor, Chenega IT Enterprise Services, LLC, hires adjunct faculty and is responsible for their qualifications and evaluations. The president told the review team that while Chenega hires adjunct faculty, the required qualifications for the various job descriptions are provided by the university and are followed by the contractor. However, no documentation was provided to the review team relating to how the quality of adjunct faculty is verified, especially in the university's ability to review their qualifications.

Full-time faculty teach 12 credits per semester, which allows sufficient participation in Faculty Senate committees, oversight of departments and programs, faculty development, assessment activities, and student advising.

The university reported a mandated annual performance evaluation system for full-time faculty

carried out by academic deans; however, the faculty and staff reported inconsistencies in evaluation processes. When asked about the performance evaluation process, some faculty referred to the course evaluations that the students completed as their evaluation, while others mentioned being observed. The university is encouraged to ensure the application of a consistent process for evaluating full-time faculty and, most importantly, that all are aware of the process and expectations. The adjunct faculty are reviewed by Chenega, LLC, a contractor that hires, supervises, and evaluates adjunct faculty. The evaluation processes for the adjunct faculty members were not clear to the review team, further compromising the university's ability to ensure quality adjunct faculty.

Faculty are available to students during office hours, posted on doors, and appear in syllabi. The in-person students reported high satisfaction with connecting with their faculty, using email first and then sending a text message if they didn't get a response. Students reported getting a response within a day or sooner. However, several complaints about faculty and departments were present in the student survey.

Students spoke very highly of admissions staff, career services, and counselors about the help they provide. One student reported she "knew who to go to" to receive assistance; other students echoed this sentiment during the session. The Assurance Argument noted a 2022 campus reorganization, separating the Dean of Students and Student Affairs into its own division and that has helped to enhance student services.

Unfortunately, multiple reports of dissatisfaction with financial aid staff were reported in person and extensively in the student survey. These complaints, discussed at length by students, were valid concerns about the distribution of financial aid each semester and the consistent lack of communication from the office. Students reported that the semester is almost over, and several haven't yet received funding disbursements. More than half of the students who were present for the student session reported this is a common occurrence that happens "most semesters." They shared that the Financial Aid office's unresponsiveness compounds their frustration, as repeated phone calls and emails go unreturned, and they cannot connect with anyone who can address their concerns. Approximately 40% of the comments submitted on the student survey were related to dissatisfaction with financial aid.

None of the students present were aware of any process for them to submit a complaint.

According to the Assurance Argument, "The Office of Financial Aid was transferred to the Chief Financial Officer. This change has allowed the Financial Aid team to access the resources they need more effectively to improve the overall support provided to students." According to the university President, financial aid distribution occurs during the federal black-out period, a time at the end of the federal fiscal year when no expenditures are allowed. The operating account at Haskell is a Treasury Department account.

Evidently, this year was particularly difficult due to software problems at Treasury. According to the president, emergency assistance is available from the university; however, students seemed unaware of this option. The team recommends significantly improving communication with students, ensuring that students are aware of the options regarding emergency assistance, and establishing prompt response times for student inquiries. The review team suggests that Haskell implement a customer satisfaction survey related to Financial Aid to be conducted at regular intervals as a means to establish feedback and to verify improvements.

Haskell is fully staffed with appropriately qualified and supported student support services personnel,

with the exception of the Financial Aid office. Innovation and commitment to student success were evident in interviews with personnel, many of whom have been in their positions for 15 years or more. The staff at Haskell are hired as federal government employees, so they must meet stringent qualification criteria for highly competitive positions. This process guarantees they are appropriately qualified for their positions.

For these reasons, the team finds Core Component 3.C to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirements to be Not Met:

- Assumed Practice A.3 *("The institution provides its students, administrators, faculty, and staff with policies and procedures informing them of their rights and responsibilities within the institution.")*

- Assumed Practice A.4 ("*The institution establishes and publicizes clear procedures for receiving complaints from students and other constituencies, responding to complaints in a timely manner, and analyzing complaints to improve its processes.")*

- Assumed Practice B.2.a *("The institution establishes and maintains reasonable policies and procedures to determine that faculty are qualified.")*

- Assumed Practice B.3.a *("Financial aid advising clearly and comprehensively reviews students' eligibility for financial assistance and assists students in a full understanding of their debt and its consequences."*

- FDCR**.**A.10.030 Institutional Record of Student Complaints ("*An institution shall be able to demonstrate that it keeps an account of the student complaints it has received, including its processing of those complaints, and how that processing comports with the institution's policies and procedures on the handling of grievances or complaints.")*

- FDCR.A.20.020 Recruiting, Admissions and Related Enrollment Practices **(**"*the institution should provide oversight to ensure that the appropriate staff and board members are provided with ethical marketing training")*

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.D - Core Component 3.D

The institution provides support for student learning and resources for effective teaching.

1. The institution provides student support services suited to the needs of its student populations.
2. The institution provides for learning support and preparatory instruction to address the academic needs of its students. It has a process for directing entering students to courses and programs for which the students are adequately prepared.
3. The institution provides academic advising suited to its offerings and the needs of its students.
4. The institution provides to students and instructors the infrastructure and resources necessary to support effective teaching and learning (technological infrastructure, scientific laboratories, libraries, performance spaces, clinical practice sites and museum collections, as appropriate to the institution's offerings).

Rating

Not Met

Rationale

As reported in the Assurance Argument, a campus reorganization was implemented at Haskell in 2022 to enhance student services. A team including the Vice President of University Operations and the Dean of Students now leads student services at Haskell. Haskell may want to consider including the Director of Admissions, Director of Financial Aid, Registrar, Housing Director, and others on the lead team to continue to improve student services and communication between departments.

In 2023, the President reinforced "Haskell's dedication to fostering its students' academic, professional, and personal success." This included the identification of new positions and new roles for current positions. It is hoped that with time and stability in leadership, communication will improve, and the "silos" that impede communication and jeopardize improvement efforts will be eliminated. However, a lack of effective communication surfaced numerous times in various settings as a challenge for the Haskell community.

Two complaints were received in the student survey about addressing the needs of students with disabilities. One complaint was related to the health issues of a disabled student who fell behind, did not receive support, and then was denied financial aid. The complaint did not clearly state whether the student had accommodations and, if so, if they were followed. Another student with a disability described a significant issue with accessibility in student housing, thus requiring a very long commute. Based on student complaints, it is not clear if the on-campus housing is compatible with ADA requirements, as the review team did not visit on-campus housing. In conversations with the president, he acknowledged that housing is old and sub-standard; however, the university has been unable to secure funding through the Bureau to build additional housing or upgrade/remodel existing housing. The team received multiple comments about concerns about student safety, especially in relation to student housing. Issues regarding safety and complaints, addressed in Core Component 2.A and 3.C impact the institution's ability to meet Core Component 3.D.

Students reported being unaware of the formal complaint process on campus. In a follow-up email to the team, the Vice President of Academics assured the review team that the process for making a complaint would be added to Student Orientation. This is also covered in Core Component 3.C.

Faculty, staff, and students consistently reported communication between departments as a challenge and barrier to improved student services. Students reported knowing the Student Success Center served as advisors for first-year students, but it was unclear who their academic advisors were after that first semester or year. They said they typically found a faculty member on their own to help them with their advising questions. Faculty reported they used to get lists of their advisees, but currently, only some of them get these lists, and they are often not accurate. Academic advising is crucial to student success, so it is important for students to know who their advisors are and for advisors to know who they are advising.

At least seven complaints in the student survey related to poor communication and conduct on the part of the faculty. Students reported feeling disrespected, having grades discussed in front of other students, and that faculty would benefit from trauma-informed care training. The institution has not clearly communicated what support services are available and how they can be accessed.

The learning support and preparatory instruction to address the academic needs of the students at Haskell is in progress. The faculty report a high confidence level in ALEXS, an online platform dedicated to empowering students in their math learning journey, specializing in tutoring and comprehensive preparation for advanced mathematics courses. The process for directing entering students into writing courses that the students are adequately prepared for is in progress, and English faculty are researching a variety of options. The recommendation is to prioritize these efforts to ensure students are enrolling in courses that are appropriate for their continued academic success.

Haskell's infrastructure and resources adequately support effective teaching and learning, with the exception of distance education delivery, as discussed in Core Component 3.A. It is not clear that appropriate student services are provided to students who are online. A component of ensuring quality in distance education offerings is to ensure that appropriate online student services and academic support services are also provided.

The institution has a large physical footprint that is a mixture of historic buildings and modern classroom/teaching buildings that appear to be in good repair and well-maintained. Students interviewed reported the campus has modern technological amenities that meet their needs and allow instructors to teach with computer technology. The computer and science labs have up-to-date equipment and are well-maintained. The campus speaks to the institution's mission as a tribal college with powwow grounds, a sports stadium with historical significance, a bookstore, and a museum and cultural center.

For these reasons, the team finds Core Component 3.D to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Assumed Practice A.3 *("The institution provides its students, administrators, faculty, and staff with policies and procedures informing them of their rights and responsibilities within the institution.")*

- Assumed Practice A.4 *("The institution establishes and publicizes clear procedures for receiving complaints from students and other constituencies, responding to complaints in a timely manner, and analyzing complaints to improve its processes. The institution does not retaliate against those who raise complaints.")*

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

3.S - Criterion 3 - Summary

The institution provides quality education, wherever and however its offerings are delivered.

Rationale

Haskell offers four bachelor's degrees, nine associate's degrees, and two new certificate programs. The university has policies and processes to ensure courses and programs are current and rigorous. Haskell offers a broad general education that aligns with the college's mission and CIRCLE values. Cultural responsiveness and diversity are core parts of the general education curriculum.

The institution has adequately credentialed full-time faculty and staff to carry out its mission, and they are provided with professional development opportunities and funding for support. It is not evident that the university has adequate oversight of adjunct faculty qualifications or the quality of their instruction. Support for distance education appears to be completely lacking.

The university infrastructure meets the learning needs of students, with the apparent exception of support for distance education. Students have curricular research training and additional opportunities for support and participation in research. There is rich co-curricular programming that aligns with the mission of developing students holistically, encouraging leadership, and serving Indigenous communities. Despite being identified during the 2019 visit, the assessment of co-curricular programs has not yet occurred.

The team recommends the immediate establishment of stronger processes and safeguards to ensure course, program, general education, and institutional learning outcomes are being met.

4 - Teaching and Learning: Evaluation and Improvement

The institution demonstrates responsibility for the quality of its educational programs, learning environments and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement.

4.A - Core Component 4.A

The institution ensures the quality of its educational offerings.

1. The institution maintains a practice of regular program reviews and acts upon the findings.
2. The institution evaluates all the credit that it transcripts, including what it awards for experiential learning or other forms of prior learning, or relies on the evaluation of responsible third parties.
3. The institution has policies that ensure the quality of the credit it accepts in transfer.
4. The institution maintains and exercises authority over the prerequisites for courses, rigor of courses, expectations for student learning, access to learning resources, and faculty qualifications for all its programs, including dual credit programs. It ensures that its dual credit courses or programs for high school students are equivalent in learning outcomes and levels of achievement to its higher education curriculum.
5. The institution maintains specialized accreditation for its programs as appropriate to its educational purposes.
6. The institution evaluates the success of its graduates. The institution ensures that the credentials it represents as preparation for advanced study or employment accomplish these purposes. For all programs, the institution looks to indicators it deems appropriate to its mission.

Rating

Not Met

Rationale

The 2019 Mid-Cycle review included only two examples of completed program reviews, and an Interim Report was required to be submitted in July 2022. The report provided updates on program reviews in progress by degree levels, but several elements were incomplete. An embedded report was then required to be included in the current 2024 comprehensive evaluation. The report was to include two full years of data from program reviews conducted during 2022-23 and 2023-24. The report was to include the results of the program reviews and explain any changes or improvements made due to the program review outcomes.

Per the embedded report requirement, academic program reviews (APR) were completed for seven of nine associate degree programs and three of four Bachelor's degree programs, with reviews submitted between 2022 and 2024. Three associate degree programs from the College of Education and Health

Sciences completed their academic program reviews as a single departmental review. The Bachelor of Science in Elementary Education program did not submit a review, and the Assurance Argument noted that it is up for review in 2025. The Associate of Science in Natural Sciences program is scheduled for the 2420-25 academic year, as is the Associate of Science in Paraprofessional Education. The Geographic Information Systems certificate is scheduled for Spring 2025.

The APRs varied widely in length, evidencing a great deal of inconsistency between the various programs' reviews. Most reviews included course enrollment and/or program enrollment data from fall 2018 to summer 2022. Some programs also included graduation data. Other data were included but were not consistent across the various disciplines. Concerns raised in the APRs included a lack of adequate faculty within the program, the lengthy time needed to complete the hiring process, too many program review changes and expectations, and high administrative turnover. The COVID-19 Pandemic also proved to be problematic.

Assessment reports were to be included in program review documentation. During the on-campus visit, faculty interviews related to assessment revealed confusion about conducting assessments and related reporting processes. This is addressed more fully in Core Component 4.B.

External evaluations were completed for several programs. Results from the external reviews included requests to fill vacant faculty positions with full-time/permanent faculty; the need to develop an assessment plan that includes collecting and analyzing data on all PLOs and CLOs; the gathering of data on student satisfaction; the gathering of graduation data; and the need for employer satisfaction data.

Some program review updates and recommendations for improvement were included in the Assurance Argument; however, little evidence was provided on the actual changes made, and none of the reviews included Continuous Academic Improvement Plans (CAIPs) as specified in the *Academic Degree Program Review Guidebook.* During the visit, the faculty described several planned updates that were not included in the program review documentation, and the team heard a commitment from university leadership to follow through.

Haskell also noted an increase in the total number of faculty on campus, from 29 full-time faculty to 39 full-time faculty; the institution has hired four permanent academic deans and a new Vice President of Academics. The additional hires should add to the academic program review capacity of the institution and are expected to bring much-needed stability.

Haskell developed a comprehensive *Academic Degree Program Review Guidebook* in 2019 and approved it through 2022. Revisions to the 2019-2022 guidebook were not made due to the COVID-19 pandemic and the Center for Institutional Effectiveness (CIE) closure. Also noted was that two additional years were needed to evaluate the program review process. As further detailed in Core Component 3.A and Core Component 5.B, the campus closing slowed down the ability to follow the timeline. Unfortunately, the self-studies were inconsistent, the quality varied widely, and the CAIPs were not written.

According to Haskell's *Academic Degree Program Review Guidebook*, "Continuous Academic Improvement Plans (CAIPs) should be developed based on the program review process following the external review and the Dean's and VPA's recommendations." In reviewing the APRs, no evidence of CAIPs was included in the Assurance Argument, nor were timelines for completing planned improvements. Interviews with faculty indicated that little or no feedback on the completed APRs has been provided by academic leadership. Without feedback, the CAIPs were evidently not written since

the timeline in the Guide indicated that they would be written after Dean and VPA recommendations. CAIPs were identified as the forward-looking plans to improve student outcomes, and the lack of them has impacted the university's ability to link both program reviews and assessment of student learning to its planning and budgeting as required by, and discussed in, Core Component 5.C.

The guidebook also requires "an annual assessment" of the program during various semesters. It is unclear if this will be an evaluation of the program or an assessment of student learning outcomes. It should be noted from a review of the syllabi provided to the review team that there is confusion between the terms objective and outcome (see Core Component 3.A). The terms "evaluation and assessment" are also being confused.

Clarifying the expectations in this part of the guidebook would be beneficial to improve the process. A commitment was made at the time of the 2019 Interim Report to develop an assessment guidebook. It was to be completed and included in the updated *Academic Degree Program Review Guidebook*. While the various types of learning outcomes are defined in the Guide, there are no guidelines for assessing them, no determined cycle of assessment steps, and no guidance on reviewing the data collected in order to make improvements to teaching and learning. Some of the program reviews provided did not include any data related to the assessment of student learning outcomes. While not specifically required, the development of an assessment guidebook, either embedded in the program review guide or as a stand-alone, will significantly assist the university in moving its assessment efforts forward.

The School of Education is the only school currently holding specialized accreditation through the Kansas State Department of Education (KSDE) and nationally through the Council for the Accreditation of Educator Preparation (CAEP).

Haskell has an established credit hour policy and process that is reviewed by the registrar. An established transfer credit policy requires the deans, subject matter experts, and faculty to review transfer credit. Both policies are in the institutional catalog as well as the University PolicyStat page.

Haskell does not currently award credit for experiential learning. However, credit is awarded for military experiences. The university indicated that it is in the process of developing a policy for awarding credit for prior learning.

The site visit team acknowledges that Haskell has made some progress in addressing the requirements of Core Component 4.A. The expectations of the Interim Report have not been fulfilled. Much of the progress is still in the developmental stage, and there has been little progress in implementing ongoing, meaningful, and consistent program review processes.

The university has failed to fulfill all of the expectations of the embedded report, as indicated by the wide disparity in APR reports; inconsistent and poor use of data; lack of feedback from Deans and the VPA; lack of CAIPs; poor, if any assessment reports; no development of an assessment guide; continued failure by programs to assess their students; continued failure to assess all types of student learning outcomes, and consistent failure to assess co-curricular activities.

For these reasons, the team finds Core Component 4.A to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Assumed Practice C.6 *("Institutional data on assessment of student learning are accurate and address the full range of students who enroll.")*

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

4.B - Core Component 4.B

The institution engages in ongoing assessment of student learning as part of its commitment to the educational outcomes of its students.

1. The institution has effective processes for assessment of student learning and for achievement of learning goals in academic and cocurricular offerings.
2. The institution uses the information gained from assessment to improve student learning.
3. The institution's processes and methodologies to assess student learning reflect good practice, including the substantial participation of faculty, instructional and other relevant staff members.

Rating

Not Met

Rationale

Learning outcomes are established at Haskell for courses (CLOs), programs (PLOs), general education (GELOs), and at the institutional level (ILOs). Haskell does not have an Assessment Committee or an individual primarily responsible for overseeing and ensuring assessment practices. It is possible that the program review support team mentioned in the interim report could fulfill this function so there is more alignment between assessment and program review; "The team would create opportunities for mentorships and training …to strengthen the processes of assessment and review." The team would consist of, "administrators, academic staff, and faculty."

The 2022 Interim Report indicated that there were required, "Data to be collected which differentiate between levels of assessment include Institutional Learning Outcomes (ILOs), Program Learning Outcomes (PLOs), General Education Learning Outcomes (GELOs), and Course Learning Outcomes (CLOs)."

A review of course syllabi revealed that most contain either course objectives, learning outcomes, or both. Some are clearly written, achievable by students, and measurable. However, many are overly complex and/or not measurable. The difference between objectives and outcomes is not clear. Both faculty and administration reported confusion about the difference between grading and assessment. Where assessment reports were provided, differentiation in the type of instruction (on-ground versus online) was not provided. It is impossible to determine how Haskell ensures the quality of its instruction across all modes of delivery, given the lack of meaningful assessment data in most cases. See Core Component 3.A for more information.

Haskell does not have consistent language related to all assessment practices, specifically course learning outcomes, program learning outcomes, general education learning outcomes, and institutional learning outcomes. Having both GenEd outcomes (GELOs) and Institutional Learning Outcomes (ILOs) may not be necessary. The university may find it easier to establish one set of ILOs (or GELOs) that can be assessed in both general education and program-specific courses.

According to the Assurance Argument, six Institutional Learning Outcomes (ILOs) were approved and adopted in 2019. However, interviews with the president, administration, and faculty revealed that they will need to be reviewed and revised as they are not measurable in their current state. Failure to assess the ILOs is indicative that the university failed to fully implement the requirements of the 2022 Interim Report.

It was reported that the Faculty Senate appointed a committee work to finalize the following four GELOs: Quantitative and Qualitative Information and Reasoning, Oral and Written Communication, Historical and Cultural Forces, and Wellness. However, it was not clear if or when the GELOs were approved. The GELOs have not been assessed since at least 2019. While the Assurance Argument stated that program reviews for the English and Communication Studies included general education courses as part of the APRs, it could not be verified in onsite interviews. Assessment processes and requirements were not clear to the faculty. Numerous changes in university leadership and the COVID-19 pandemic have also proved problematic in implementing GELO assessments. Failure to assess the GELOs is indicative that the university failed to fully implement the requirements of the 2022 Interim Report.

Each Haskell program has its own set of PLOs, typically between six and ten. While the PLOs and GELOs are published in the Academic Catalog, they were not found in the course syllabi. It is unclear how program learning outcomes, general education learning outcomes, or institutional learning outcomes are communicated to students or assessed. A number of the PLOs provided in various program reviews are not assessable as written. The team recommends that Haskell implement a full review of all learning outcomes to ensure that they are assessable (SMART criteria may be of assistance in this effort). The team recommends that Haskell map all of these outcomes to courses and course outcomes. Fully implementing curriculum mapping of outcomes will help to ensure that students have opportunities to achieve the outcomes assured by the university.

Haskell provided some examples of how outcome data are tracked within courses. Some programs follow the course-level assessment report, and others provide more of a narrative of course-level outcomes. Each program is theoretically required to assess at least one program outcome each academic year, and faculty should assess at least one outcome in one course each semester. In interviews during the faculty session, clarification was sought on how course-level assessments are tracked over time and what impact the changes had on student achievement. There was confusion on the part of the faculty about this process, and it could not be clearly explained. There is a lack of consistent assessment at all levels.

Data tables of grade distribution from the summer of 2020 to the spring of 2024 that aligned to standards were provided as examples of student achievement in the education program, along with rubrics. Grade distribution is not the assessment of student learning. Additionally, no data analysis was provided, nor were there action plans for improvement. It is unclear if the faculty members know if their students are achieving the stated outcomes at either the course or program level, much less in general education or at the university level.

The university has many co-curricular activities that meet students' needs and provide rich multicultural experiences. However, with one exception, none of these activities are assessed to verify student learning. Failure to assess the co-curricular outcomes is indicative that the university failed to fully implement the requirements of the 2022 Interim Report. It may be possible in the future to assess ILOs in co-curricular activities as one facet of assessing ILOs.

In summary, Haskell has failed to improve its assessment practices despite repeated monitoring

requirements from the Commission in the past. Due to the substantial number of leadership changes and the requirements of adapting to COVID-19 pandemic conditions, assessment practices have regressed. While a few pockets of assessment are occurring, there is no evidence that the university is using assessment results to improve student learning, much less to ensure that students are competent to meet the outcomes at all levels. There is no evidence that quality is maintained across methods of delivery. Recommendations based on the assessment data do not appear to be made or included in budgeting and planning (see Core Component 5.C).

Haskell may find it beneficial to look to organizations such as the National Institute for Learning Outcomes Assessment (NILOA), the Indiana University Assessment Institute for assessing academic programs, as well as NASPA for co-curricular assessment. These organizations and many others have free or low-cost programs available to support the university's efforts. There are also several tribal colleges that have excellent assessment practices who may be of assistance.

For these reasons, the team finds Core Component 4.B to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Assumed Practice C.6 *("Institutional data on assessment of student learning are accurate and address the full range of students who enroll.")*

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

4.C - Core Component 4.C

The institution pursues educational improvement through goals and strategies that improve retention, persistence and completion rates in its degree and certificate programs.

1. The institution has defined goals for student retention, persistence and completion that are ambitious, attainable and appropriate to its mission, student populations and educational offerings.
2. The institution collects and analyzes information on student retention, persistence and completion of its programs.
3. The institution uses information on student retention, persistence and completion of programs to make improvements as warranted by the data.
4. The institution's processes and methodologies for collecting and analyzing information on student retention, persistence and completion of programs reflect good practice. (Institutions are not required to use IPEDS definitions in their determination of persistence or completion rates. Institutions are encouraged to choose measures that are suitable to their student populations, but institutions are accountable for the validity of their measures.)

Rating

Met

Rationale

Haskell Indian Nations University pursues educational improvement through its degree and certificate programs' goals and strategies that improve retention, persistence, and completion rates. The university has an established definition of retention rates and provided overall retention rates from fall 2018-2019 of 67.3% to fall 2022-fall 2023 of 56.1%. No analysis of the data was provided, but it was noted that there was a slight increase in graduation rates from fall 2021 to fall 2022 after a continued downward trend from fall 2018 to fall 2019. Graduation rates and transfer-out rates were also provided from the report year 2019-2020 to 2023-2024, with graduation rates in 2019-2020 of 46% to 43% in the report year 2023-2024 and transfer-out rates in 2019-2020 of 27% to 28% in 2023-2024. No analysis of data was provided for graduation and transfer-out rates.

Haskell serves students from approximately 150 American Indian Tribes and Alaskan Native Villages from all parts of the United States. A key indicator of Haskell's commitment to work to improve retention, persistence, and graduation rates is their partnership that began in 2020 with the Achieving the Dream (ATD) initiative that helped assist Haskell in setting measurable goals in student retention, persistence, and completion. In reviewing historical retention data, Haskell found gaps in pre-college student achievement, especially in math and English. To address the gaps, the institution prioritized improving success rates in developmental and gateway courses, focusing on math with a drop, fail, or withdraw rate of greater than 30%. Evidently, Haskell is not currently part of ATD.

Haskell submitted an HLC Qualitative Initiative Report on May 30, 2024. The purpose of the report was to evaluate institutional efforts in taking on a challenge or pursuing a yet unproven strategy or

hypothesis. The HLC Qualitative Initiative Report uses a peer review panel for this process. The university's report aimed to extend the ATD initiative from 2018 to focus on improving strategic interventions in college math. More specifically, Haskell explored the high Drop/Fail/Withdrawal (DFW) rates of >30% in the developmental math courses students struggled to complete successfully. Haskell's initiative provided detailed data analysis of student preparedness based on high school transcript reviews and ALEKS placement tests. The math department piloted a summer workshop in 2022 to assist students in improving their math placement and expanded the workshop in 2023. Math faculty found that by using ALEKS, they could discuss areas for improvement and revise math placement policies. In the spring of 2024, a new 3-credit developmental math course was developed and implemented that replaced the 5-credit remedial math course found too intensive for students. The HLC peer review panel found that Haskell demonstrated seriousness in its undertaking, that the initiative had scope and impact, and showed a commitment to the initiative.

Haskell's processes and methodologies for collecting and analyzing information on student retention, persistence, and completion reflect good practice. For example, the university reports student retention, persistence, and completion rates through IPEDS and the American Indian Higher Education Consortium (AIHEC), which uses the American Indian Measures for Success Key Indicator System (AIMS AKIS). It should be noted that the university is in the early stages of developing a Center for Teaching Excellence that will focus on approaches to improve retention, persistence, and completion rates. In interviews with administration, there was a discussion of exploring an additional model that reflects the "typical" Haskell student, where graduation time may take longer than what IPEDS reports.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

4.S - Criterion 4 - Summary

The institution demonstrates responsibility for the quality of its educational programs, learning environments and support services, and it evaluates their effectiveness for student learning through processes designed to promote continuous improvement.

Rationale

Haskell has failed to consistently demonstrate responsibility for the quality of its educational programs. While the university submitted academic program reviews for most of its programs, the reviews were inconsistent and lacked the required CAIP (improvement plan).

The university has failed to fulfill all of the expectations of the embedded report, as indicated by the wide disparity in APR reports; inconsistent and poor use of data; lack of feedback from Deans and the VPA; lack of CAIPs; poor, if any assessment reports; no development of an assessment guide; continued failure by programs to assess their students; continued failure to assess all types of student learning outcomes, and consistent failure to assess co-curricular activities.

The university has provided evidence of effective learning support services, especially for students with developmental math needs. The writing center provides support to students who need to improve their writing skills.

The team found assessment processes and the collection of assessment data to be virtually non-existent at Haskell. Assessment processes need consistency and leadership, which is lacking at the university

The university monitors retention, persistence, and graduation rates among its students. The processes employed are effective.

5 - Institutional Effectiveness, Resources and Planning

The institution's resources, structures, processes and planning are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities.

5.A - Core Component 5.A

Through its administrative structures and collaborative processes, the institution's leadership demonstrates that it is effective and enables the institution to fulfill its mission.

1. Shared governance at the institution engages its internal constituencies—including its governing board, administration, faculty, staff and students—through planning, policies and procedures.
2. The institution's administration uses data to reach informed decisions in the best interests of the institution and its constituents.
3. The institution's administration ensures that faculty and, when appropriate, staff and students are involved in setting academic requirements, policy and processes through effective collaborative structures.

Rating

Met

Rationale

Haskell Indian Nations University and its President occupy a unique position within higher education, operating directly under the Bureau of Indian Education (BIE). Despite this distinctive structure, the university remains committed to the principles of engaged shared governance. The Haskell National Board of Regents, comprising representatives from the 12 Bureau of Indian Affairs regions across the United States, serves as an advisory body to the President. In meetings with the Board of Regents, there was a clear commitment to the university and the strength of collaborative governance to achieve its mission, particularly through the MOU of Shared Governance. Additionally, the Faculty Senate Executive Committee and the Federation of Indian Service Employees (FISE) collaborate closely with the administration and the Board to contribute to policy development and institutional planning.

Over the past two decades, Haskell has experienced frequent turnover in senior leadership, as noted in the Assurance Argument. Discussions in on-campus meetings highlighted a general consensus that this leadership instability has presented significant challenges to the development and sustainability of strategic initiatives and addressing longstanding issues. In 2022, the President's position was elevated from a General Schedule (GS) role to the Senior Executive Service (SES), granting it increased decision-making authority. In on-campus meetings, many faculty and staff members observed recently improved stability and a clearer vision for the university's future under this new structure.

One noteworthy advancement of the new administration described in the Assurance Argument is the emphasis on data-driven decision-making. Over the past two years, the Haskell Center for Institutional Effectiveness (CIE) has been tasked with a leading role in coordinating data collection, analysis, and reporting. As this is a new effort, the efficacy of the dissemination of that data to make informed decisions appears to be uneven, as several individuals in on-campus meetings were unaware of CIE, its services, or its ability to assist in program review, assessment, and other data to planning and budgeting.

Strategic planning focus groups across campus have been conducted to shape a new five-year strategic plan and strengthen processes for academic program reviews and assessments, as detailed in the Assurance Argument and discussed during on-campus Open Forums. Furthermore, Haskell's partnership with the USDA/NIFA Extension Program has enhanced its ability to align its mission with the needs of the broader American Indian and Alaska Native communities it serves.

Haskell demonstrated a strong commitment to the inclusion of all relevant stakeholders in policy and procedural development when appropriate. Discussions during the Criterion 5 Open Forum revealed an appreciation among faculty, staff, and administration for the university's collaborative and effective approach to decision-making. The Assurance Argument provides clear documentation of the roles and responsibilities of the Governance and Elections Committee, Leadership Council, Executive Council, Faculty Senate, and Student Government in shaping policy and procedures. The Curriculum Committee, the Academic Standards Committee, and the Faculty Senate were particularly noted for their active and effective engagement in setting appropriate academic standards.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

5.B - Core Component 5.B

The institution's resource base supports its educational offerings and its plans for maintaining and strengthening their quality in the future.

1. The institution has qualified and trained operational staff and infrastructure sufficient to support its operations wherever and however programs are delivered.
2. The goals incorporated into the mission and any related statements are realistic in light of the institution's organization, resources and opportunities.
3. The institution has a well-developed process in place for budgeting and for monitoring its finances.
4. The institution's fiscal allocations ensure that its educational purposes are achieved.

Rating

Met

Rationale

Haskell Indian Nations University is a national intertribal institution funded by the Bureau of Indian Education (BIE) under the Department of the Interior. As noted in the Assurance Argument, Haskell operates in a unique organizational environment, though its bureaucratic processes are comparable to those of other higher education institutions in the region. The university demonstrates a commitment to its mission, emphasizing high standards of resource management and operational transparency.

Haskell is actively developing a new strategic plan, with resource allocation and infrastructure improvement identified as core priorities. The university has the necessary staff and infrastructure to support its mission and continues to enhance its capabilities as funding becomes available. The Haskell Building Improvement document highlights significant investments, including $57.6 million spent on science labs and classrooms since 2019. Additionally, since 2019, Haskell has made several critical upgrades in Information Technology, such as the Tech Refresh Program, improvements to the wireless network, data server enhancements, and the implementation of the new Campus Café system.

Financially, Haskell operates within the Department of the Interior's Financial and Business Management System (FBMS) for budgeting, financial planning, and real-time financial data management. In response to campus requests, the Chief Financial Officer introduced a new process in 2022 to improve budget transparency, holding monthly budget meetings with each department. While the Assurance Argument describes the university's budget-building process as grounded in campus initiatives, academic program reviews, academic needs, and institutional goals, discussions during the Criterion 5 Open Forum revealed that many departments still build budgets based on historical practices with little input from academic program reviews or the assessment of student learning outcomes. This indicates an area for further development in aligning resource allocation with institutional assessment and planning processes. (see Core Component 5.C)

Haskell's fiscal operations are predominantly funded by the BIE to support its staffing, facilities,

instructional resources, and general operations. Federal appropriations are forecasted and requested two years in advance, and these resources are managed with a high degree of transparency and compliance with federal guidelines. In addition to federal funding, Haskell has successfully secured Title III funding and other grants, as documented in the Assurance Argument and on-campus meetings. The university has also demonstrated success in generating additional revenue through external partnerships with various agencies and grants.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

5.C - Core Component 5.C

The institution engages in systematic and integrated planning and improvement.

1. The institution allocates its resources in alignment with its mission and priorities, including, as applicable, its comprehensive research enterprise, associated institutes and affiliated centers.
2. The institution links its processes for assessment of student learning, evaluation of operations, planning and budgeting.
3. The planning process encompasses the institution as a whole and considers the perspectives of internal and external constituent groups.
4. The institution plans on the basis of a sound understanding of its current capacity, including fluctuations in the institution's sources of revenue and enrollment.
5. Institutional planning anticipates evolving external factors, such as technology advancements, demographic shifts, globalization, the economy and state support.
6. The institution implements its plans to systematically improve its operations and student outcomes.

Rating

Not Met

Rationale

Haskell Indian Nations University primarily receives funding through federal appropriations, as documented in the Assurance Argument. Haskell has demonstrated efforts to diversify its resources by securing Title III funds and various external grants. Conversations with the president noted that Haskell is actively revitalizing its foundation to strengthen donor support. The Vice President of Operations also highlighted ongoing efforts to enhance physical resource development through dedicated funding from the Bureau of Indian Affairs.

Due to its federal status, the university is not subject to annual audits. It is exempt from that requirement in Assumed Practice D.5, provided that the institution can demonstrate "other reliable information to document the institution's financial resources and management." However, close oversight of financial operations is maintained through the Bureau of Indian Education and implementation of federal fiscal policies and procedures. According to the university president, the university's operating account is held by the Treasury Department, which ensures that policies are followed. The federal blackout period at the end of each fiscal year can affect payment to contractors and financial aid disbursements.

Haskell's mission emphasizes its Federal American Indian and Alaskan Native Trust Responsibilities, addressing the post-secondary needs of its communities through academic rigor and Indigenous-focused programming. While the Assurance Argument indicates that the university's mission informs its operational planning, these efforts remain heavily focused on navigating federal regulations rather than driving systematic improvements in operations and student outcomes.

The 2019 Mid-Cycle Review Team identified that Haskell had not consistently linked its processes

for assessing student learning, evaluating operations, planning, and budgeting. While the implementation of WEAVE since 2015 initially appeared to address these gaps, its impact was uneven across the university. Haskell no longer uses WEAVE, and no current mechanisms for integrating assessment and program reviews into broader planning efforts could be identified. See Core Components 4.A and 4.B.

While Haskell's current planning process is forward-looking, it still lacks defined linkages to program reviews, assessment of student learning outcomes, or an overarching strategic plan. Haskell provided descriptions of its planning processes in the Assurance Argument, including references to using assessment and program reviews for strategic planning, budgeting, and operations. However, little to no evidence of these practices was found in the Assurance Argument or through on-campus conversations. The examples shared were often anecdotal and lacked comprehensiveness across the institution. It appears that the university has made little progress in addressing these issues, and in fact, it has regressed.

Despite these challenges, Haskell has successfully secured external funding, including Title III funds for technology upgrades, and has invested $57.6 million in buildings and infrastructure since 2019. Evidence was also provided of planning for future enrollment growth and evolving course delivery methods, demonstrating efforts to strengthen physical, technological, and staffing capacities.

The university initiated the process for a new strategic plan in Fall 2023, with stakeholder data collection sessions held in Spring 2024. Analysis of this data has recently been completed, and Haskell aims to outline its new strategic plan with the goal of implementation by May 2025. However, there remains little evidence that Haskell's strategic planning process effectively integrates key elements such as student learning assessment and program reviews to operational evaluation, budgeting, and resource allocation in a cohesive and meaningful way, as there is no significant evidence that those processes exist.

Haskell states in the Assurance Argument that its commitment to continuous improvement is reflected in efforts to integrate feedback from internal and external evaluations into planning processes. However, without a well-developed policy and procedures for assessing student learning outcomes and consistent academic program reviews, the university will face significant challenges in systematically improving its operations and student outcomes.

For these reasons, the team finds Core Component 5.C to be Not Met.

For the reasons detailed above, the team also finds the following other HLC requirement to be Not Met:

- Assumed Practice D.4 to be Not Met *("The institution maintains effective systems for collecting, analyzing, and using institutional information.")*

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

5.S - Criterion 5 - Summary

The institution's resources, structures, processes and planning are sufficient to fulfill its mission, improve the quality of its educational offerings, and respond to future challenges and opportunities.

Rationale

Haskell Indian Nations University faces significant challenges related to its assessment of student learning and academic program review processes. While the institution operates under the Bureau of Indian Education (BIE) and demonstrates a strong commitment to its mission and governance, it has struggled to integrate these critical elements into its operational planning and resource allocation.

Currently, no mechanisms or evidence exist to demonstrate the integration of assessment and program review into broader institutional processes especially planning and budgeting. Descriptions in the Assurance Argument and on-campus conversations reveal that examples of these practices are anecdotal and lack comprehensiveness, indicating regression in addressing this key criterion. The review team found that the requirements established in the 2022 Interim Report had not been accomplished.

Without a well-developed policy and procedure for these processes, Haskell risks ongoing challenges in achieving meaningful improvements in operations and outcomes. Developing and implementing robust systems for assessment and program review will be critical for the university's ability to meet its goals and advance its mission.

FC - Federal Compliance

Rating

Not Met

Federal Compliance Filing Form

- FedCompFiling-2024-HINU

Rationale

Federal Compliance Rationale Template
Effective September 1, 2024–August 31, 2025

Instructions: When an evaluation that includes a Federal Compliance Review is released to the peer review team in the Assurance System, copy and paste the text below into the Rationale section of the Federal Compliance tab.

1. **ASSIGNMENT OF CREDITS, PROGRAM LENGTH AND TUITION**

Conclusion:

The institution meets HLC's requirements.

Rationale:

Haskell Indian Nations University has a semester-hour system and offers associate and bachelor's degree programs. A review of the website provides documentation of nine associate and four baccalaureate degree programs offered under the auspices of four colleges within the university. Associate degrees include 36-38 hours of general education courses, with120-122 total credit hours. The Business Administration program has three possible emphasis areas. Two certificate programs are also available: Geographic Information Systems, which has 14 credit hours, and Records Information Management, which has 15 credit hours. All programs have the expected range of credit hours and requirements and follow standard and good practices. Detailed program information is provided to students in the college catalog and through the website.

The federal compliance reviewer verified the currency of online program information with the institution and reviewed all programs to identify credit hours, general education, and adherence to university policies. All are in compliance and within acceptable credit hour ranges,

The reviewer requested a sample of 24 undergraduate course syllabi that represent in-class, online, and hybrid courses and, in some cases, multiple sections of the same class taught by different instructors, including some adjuncts. The syllabi were uploaded to the Addendum for reviewer and

team access.

Courses reviewed followed a fairly standard syllabus format, including instructor information, course credit, meeting days and time or online information, course description, learning outcomes, and course activities. Syllabi also included boilerplate information related to support services. A couple of courses did not list meeting days and times, but these were verified in the online schedule. The university does not offer any dual-credit courses. Multiple-section courses appear to have the same or very similar learning outcomes. Note that Haskell does not appear to meet the federal standard for regular and substantive contact in online courses. This is covered in more depth in Core Component 3.A.

The university has a policy defining the semester which is 15 weeks in length; eight for summer school sessions. Most courses appear to be offered for the full semester. Shorter courses within a semester adhere to the established credit hour policy. The development of the annual academic calendar is under the purview of the Vice President for Academics and is created five years in advance with input from academic deans and faculty and approval by the Senate, President, and Executive Council.

Haskell has established a comprehensive credit hour policy to reflect best practices in higher education. The institution had an interim report due in 2016 on the policy and, therefore, completed a comprehensive review and update at that time. The standard 50-minute hour per week per credit of a full semester course is utilized, and equivalencies are discussed for other modes of delivery such as lab and internships. The policy indicates that "regardless of the mode of instruction, courses will be consistent in terms of purpose, scope, quality, assessment, and expected learning outcomes with other courses with the same course title and number." Credit hours are approved during the course approval process and reviewed through appropriate academic channels. A procedure is provided for syllabi development to further identify expected credit for various modalities and include out-of-class study time. Hybrid courses generally contain an external learning module. The courses reviewed comply with the institution's policy. A syllabus checklist is also utilized to review syllabi for appropriate content.

Haskell is a tuition-free institution with a policy on the cost of attendance. It publishes information for students online that includes fees and other costs. At the request of the peer review team, the information was moved to a location on the university website that is easier for students to find. This information is utilized to determine the need for financial aid. Room and Board costs are not directly published on the website, but a student can access the Net Price Calculator through the financial aid page to see total costs. The refund policy is published. Fees are non-refundable, but students may apply to move them to a subsequent semester.

2. **INSTITUTIONAL MECHANISMS FOR HANDLING STUDENT COMPLAINTS**

Conclusion (Choose one of the following statements and delete the other.):

The institution does not meet HLC's requirements.

Rationale:

Haskell Indian Nations University has a policy on student complaints that was approved in 2015. The

policy indicates that it does not apply to academic issues, including faculty concerns, student grievances, or other program-specific policies. Complaints are sent to the Vice President of University Services, and that office also tracks complaints and actions.

Areas receiving complaints not covered by the formal policy must submit data to the VP's office for tracking purposes. It is not clear that this process is being followed. Additionally, there does not appear to be a policy, procedure, or reporting process to address student complaints related to academic issues. Several complaints about faculty or programs were mentioned in the student survey. Extensive complaints were received by the BIE, as documented in the BIE report. Students evidently did not find complaints to be resolved through on-campus processes.

The university meets the requirements in some areas but did not provide evidence of processes or procedures to handle student complaints related to academic issues, including complaints about faculty. This is addressed in more detail in Core Component 2.A and 3.C.

3. **PUBLICATION OF TRANSFER POLICIES**

Conclusion (Choose one of the following statements and delete the other.):

The institution meets HLC's requirements.

Rationale:

Haskell Indian Nations University clearly publishes its policy for transfer student admission on the website. The information includes the detailed process for applying for admission. Under the Registrar's Office tab on the website, HINU provides information on the transfer of credit into the institution. Under the Consumer Information tab, the transfer of credit policy describes how credit is evaluated and how students are notified when they transfer credit. It also discusses challenge exams.

The institution has a transfer articulation agreement with the University of Kansas. Students are directed to the equivalency table. HINU also has transfer MOUs with Nebraska Indian Community College and the College of Muscogee Nation. They are published on the Registrar's Office tab.

Haskell would benefit from a comprehensive transfer page that addresses both transfer in and transfer out and discusses nontraditional methods of receiving credit, such as exams, military, and life experience. The university reported that credit for prior learning policies are under development.

4. **PRACTICES FOR VERIFICATION OF STUDENT IDENTITY**

Conclusion:

The institution meets HLC's requirements.

Rationale:

Haskell Indian Nations University assigns a unique student identifier to each student in the student information system. After verification of identity, ID cards are generated, and students can then access other systems. Single Sign-on (SSO) is facilitated through the Azure system. For the email system, Microsoft authentication is utilized along with Azure. The app facilitates SSO in systems such as the learning management system. Privacy is protected to a large extent by allowing students to determine how much of their personal information is populated in the systems. The SIS has

institutional security protocols.

No additional fees are assessed to students for the learning management system and related support.

5. PROTECTION OF STUDENT PRIVACY

Conclusion:

The institution meets HLC's requirements.

Rationale:

Haskell Indian Nations University provides privacy information under the Consumer Disclosure tab. The FERPA policy is abbreviated on the website but is comprehensive in explaining the student's protection regarding the confidentiality of student records and release of information. It discusses the student's rights for nondisclosure.

The institution also has a comprehensive records retention policy although it is unclear if it is published for students to review.

All employees and contractors are required to successfully complete (minimum 80% passing) annual Information Management and Technology (IMT) Awareness training, which covers topics such as privacy and records management. All Employees and contractors are also required to successfully complete Role Based Privacy Training (RBPT) and Role Based Security Training (RBST).

6. PUBLICATION OF STUDENT OUTCOME DATA

Conclusion:

The institution meets HLC's requirements.

Rationale:

Haskell Indian Nations University publishes student outcome data on the website under the Institutional Effectiveness tab under the President's office. Data provided includes enrollment for several years disaggregated in a number of ways. Annual reports for 2019 and 2020 are included. More recent reports would be informative. IPEDS reports are provided for six years. Retention, graduation and transfer out rates are published utilizing the National Center for Educational Statistics data and reflect data through the 2023-24 academic year.

7. STANDING WITH STATE AND OTHER ACCREDITORS

Conclusion:

The institution meets HLC's requirements.

Rationale:

Haskell maintains an accreditation page on its website. It includes information on the university's accreditation through the Higher Learning Commission, and the Mark of Affiliation is available and

appropriately linked.

Specialized accreditation for the education department through the National Council for Teacher Education (NCATE). Haskell's College of Education (COE) is also accredited by The Kansas State Department of Education (KSDE) and the Council for the Accreditation of Educator Preparation (CAEP). The Elementary Teacher Education Program was included in the 2020 CAEP accreditation review. It would help to include current status (dates, next review) in the published information on both the accreditation and education web pages.

HINU is affiliated with the Kansas Board of Regents through participation in some grants and programs that require reporting to the Board. The university is not a member of the Kansas Board of Regents.

8. **RECRUITING, ADMISSIONS AND RELATED ENROLLMENT PRACTICES**

Conclusion:

The institution does not meet HLC's requirements.

Rationale:

While Haskell Indian Nations University provides some training for employees and contractors in areas such as privacy, paperwork, and records management and acknowledges that further training for recruiters would be positive, there is currently no indication that specific training on ethical marketing is provided for people who work directly with prospective students to provide information regarding the institution. Haskell indicated that they do not have admissions counselors, but there are recruiters and financial aid staff who should be required to complete training. In addition, no employee code of ethics was provided for the institution. Some Board of Regents members are also involved in recruitment efforts and as such, must undergo the required training as well. The requirements of this section are also covered in Core Components 2.A, 2.C and 3.C.

APPENDIX A: TITLE IV PROGRAM RESPONSIBILITIES

Complete this section **only if** the institution has submitted an Appendix A. Review any negative actions taken against the institution since HLC's last Federal Compliance review and identify any implications for the institution's current compliance with the Criteria for Accreditation or other HLC requirements. Provide a detailed rationale for any Core Components identified as Met with Concerns or Not Met.

Rationale:

NA

MANDATORY REPORTING: FRAUD, ABUSE OR FAILING TO MEET TITLE IV RESPONSIBILITIES

Federal regulations require HLC to notify the U.S. Department of Education related to the following

item. Do not skip this section.

In the course of the peer review team's evaluation of this institution, have the reviewers encountered any reason to believe that (i) the institution is failing to meet its Title IV, Higher Education Act program responsibilities (if the institution participates in Title IV, HEA programs) or (ii) that the institution may be engaged in fraud or abuse?

Answer (Choose one response and delete the other)**:**

Yes

Rationale (If the team responded "Yes," explain the reasons for concern in detail. Otherwise, leave this section blank.)**:**

The problems outlined across the Criteria and Core Components might have implications for Title IV program responsibilities. Issues related to student complaints, timely financial aid disbursement, lack of ongoing clear communication about policies, and student safety need to be addressed. There was no indication of fraud or abuse.

Interim Monitoring (if applicable)

No Interim Monitoring Recommended.

Review Dashboard

Number	Title	Rating
1	Mission	
1.A	Core Component 1.A	Met
1.B	Core Component 1.B	Met
1.C	Core Component 1.C	Met
1.S	Criterion 1 - Summary	
2	Integrity: Ethical and Responsible Conduct	
2.A	Core Component 2.A	Not Met
2.B	Core Component 2.B	Met With Concerns
2.C	Core Component 2.C	Not Met
2.D	Core Component 2.D	Met
2.E	Core Component 2.E	Met
2.S	Criterion 2 - Summary	
3	Teaching and Learning: Quality, Resources and Support	
3.A	Core Component 3.A	Not Met
3.B	Core Component 3.B	Met
3.C	Core Component 3.C	Not Met
3.D	Core Component 3.D	Not Met
3.S	Criterion 3 - Summary	
4	Teaching and Learning: Evaluation and Improvement	
4.A	Core Component 4.A	Not Met
4.B	Core Component 4.B	Not Met
4.C	Core Component 4.C	Met
4.S	Criterion 4 - Summary	
5	Institutional Effectiveness, Resources and Planning	
5.A	Core Component 5.A	Met
5.B	Core Component 5.B	Met
5.C	Core Component 5.C	Not Met
5.S	Criterion 5 - Summary	
FC	Federal Compliance	Not Met

Review Summary

Conclusion

Haskell Indian Nations University (HINU) is out of compliance with numerous Core Components, Assumed Practices, and Federal Compliance requirements. The review team recommends Probation.

The following Core Components are Not Met:

- Core Component 2.A
- Core Component 2.C
- Core Component 3.A
- Core Component 3.C
- Core Component 3.D
- Core Component 4.A
- Core Component 4.B
- Core Component 5.C

The following Core Component is Met With Concerns:

- Core Component 2.B.

In addition to the Core Components listed above, the following Assumed Practices are found to be Not Met:

- Assumed Practice A.3
- Assumed Practice A.4
- Assumed Practice A.5.g
- Assumed Practice B.2.a
- Assumed Practice B.2.b.ii
- Assumed Practice B.3.a
- Assumed Practice C.6
- Assumed Practice D.4

In addition to the Core Components listed above, the following Federal Compliance requirements are found to be Not Met:

- A.10.030 Institutional Record of Student Complaints
- A.20.020 Recruiting, Admissions and Related Enrollment Practices

In order to address the Core Components and related items HINU must complete the following prior to the Probation visit:

Core Component 2.A and related HLC requirements:

1. Provide specific training on ethical marketing to all people who work directly with prospective students. Document the date(s) the training was provided along with a list of the titles of the individuals trained.
2. Complete the **Substantive Change: Contractual Arrangements** screening form and follow the determination.

3. HINU must develop training on ethical behavior for all faculty and staff, especially related to student safety.
4. HINU must develop training(s) for all faculty and staff related to all university and federal policies and procedures that are both a) university-wide and b) specific to specific jobs.
5. The university must ensure that the students, faculty, and staff are aware of the Policy Library found on the PolicyStat. These pages must be more easily located on the Haskell website (possibly through a better navigation structure). Additionally, links to relevant federal policies should be provided via the Haskell website.

Core Component 2.B and related HLC requirements:

1.
2. Haskell must ensure that complaint policies, procedures, and forms are published in a manner that they are easily located by students and the public.

Core Component 2.C and related HLC requirements:

1. The administration must provide closer oversight of the university's compliance with federal and university policies and procedures. The university must develop a process to ensure compliance that includes documentation of policy violations and corrective actions taken.

Core Component 3.A and related HLC requirements:

1. Haskell must develop appropriate oversight to ensure that the quality of courses is consistent across all modes of delivery, which must include substantial participation by faculty. The university must identify the department or persons responsible for this oversight.
2. The university demonstrate all faculty and adjuncts know how to teach online to ensure course quality.
3. Faculty teaching online must meet the federal requirements of regular and substantive interaction (RSI), and Haskell must develop an evaluation process to ensure they are being met.

Core Component 3.C and related HLC requirements:

1. The university must work with Chenega IT Enterprise Services, LLC, to develop a process to ensure the quality of its adjunct faculty. Haskell must be able to document and review adjunct faculty qualifications post-hiring.
2. Haskell must ensure that its faculty evaluation process for all faculty is carried out regularly and consistently in order to ensure quality. Student evaluations of courses may be one facet of the overall evaluation process. Documentation must be provided of faculty evaluations and any corrective actions.
3. Haskell must ensure the publication of its clear procedures for receiving complaints from students and other constituencies. The team recommends adding this to New Student Orientation as well as other student-based activities.
4. Haskell must document all complaints in accordance with federal regulations. The documentation must include responding to the complaints in a timely manner and analyzing the complaints to improve university processes.
5. Haskell must resolve the issues with the Office of Financial Aid. A minimum time for responding to student inquiries must be established and followed, and communication with students about delays in financial aid disbursements must be improved. Haskell must develop a method for documenting improvements.

Core Component 3.D and related HLC requirements:

1. Communication with students and faculty related to the expectations of academic advising must be improved

at Haskell. Students must be informed of who their academic advisor will be and which faculty member will be their advisor after the first semester.
2. Faculty who advise students must be provided with up-to-date information on who they are expected to advise. Lists of advisees should be provided at the beginning of each semester.
3. Faculty must be provided with training covering the expectations of their advising duties.

Core Component 4.A and related HLC requirements:

1. HINU must develop processes to stabilize its Academic Program Review (APR) processes and procedures. This may include updating and clarifying the expectations in the *Academic Degree Program Review Guidebook.* This may also include clarifying the expectations around the assessment of student learning outcomes.
2. The university must identify the person(s) who are responsible for ensuring that APRs are carried out consistently and that quality expectations are met.
3. The university must complete program reviews during the sanction period. The team suggests one review per Dean. The reviews must be complete and comprehensive.
4. Feedback on the reviews must be provided in a timely manner so that programs can develop Continuous Academic Improvement Plans (CAIPs), as described in the Guide.
5. Information from the CAIPs must be utilized during the planning and budgeting process.

Core Component 4.B and related HLC requirements:

1. Haskell must develop processes/policies/procedures to establish expectations and training for faculty related to the assessment of student learning. Responsibility for the implementation of consistent assessment activities must be clarified.
2. Haskell must clarify all of the student learning outcomes: Program Learning Outcomes (PLOs), General Education Learning Outcomes (GELOs), and Institutional Learning Outcomes (ILOs) to ensure that they are assessable and measurable.
3. Outcomes must be appropriately communicated to students.
4. Assessment results must be disaggregated by type of instruction (online vs. on-ground) and analyzed to compare the quality of instruction in each teaching method.
5. Based on the assessment results, programs must identify potential improvements to instruction. This information must inform planning and budgeting.

Core Component 5.C and related HLC requirements:

1. Haskell must develop processes for linking the assessment of student learning, the evaluation of operations (APR and other types of departmental evaluations), planning, and budgeting. These processes (or policies and procedures) must be documented.
2. The responsibility for establishing, carrying out, and sustaining these processes must also be documented.
3. Systems for collecting, analyzing, and using institutional information must be in place and documented.

Overall Recommendations

Criteria For Accreditation
Not Met

Sanctions Recommendation

Probation

Pathways Recommendation
Not Applicable to This Review

Federal Compliance
Not Met

No Interim Monitoring Recommended.

Overall Recommendations

Criteria For Accreditation
Not Met

Sanctions Recommendation
Probation

Pathways Recommendation
Not Applicable to This Review

Federal Compliance
Not Met

No Interim Monitoring Recommended.

INTERNAL

Institutional Status and Requirements (ISR) Worksheet

Higher Learning Commission

Review Details

Institution: Haskell Indian Nations University, Kansas

Type of Review: Open Pathway - Comprehensive Evaluation Visit

Description: An embedded report that includes two full years of data from the program reviews conducted during 2022-2023 and 2023-2024. The report should include the results of these program reviews and explain any program changes to be made based on the outcomes of the program reviews.

Review Dates: 12/02/2024 - 12/03/2024

☐ No Change in Institutional Status and Requirements

Accreditation Status

Status: Accredited

☐ No Change
✓ Recommended Change: Accredited On Probation

Degrees Awarded: Associates, Bachelors

✓ No Change
☐ Recommended Change:

Reaffirmation of Accreditation:

Year of Last Reaffirmation of Accreditation: 2014 - 2015
Year of Next Reaffirmation of Accreditation: 2024 - 2025

☐ No Change
✓ Recommended Change: TBD

Accreditation Stipulations

General:

The institution is approved at the following program level(s): Associate's, Bachelor's

The institution is not approved at the following program level(s): Master's, Specialist, Doctoral

The institution is limited to offer the following program(s), within the approved program levels listed above: Bachelor of Science in Elementary Education, Bachelor of Arts in American Indian Studies, Bachelor of Science in Business Administration, and Bachelor of Science in Environmental Science

✓ No Change
☐ Recommended Change:

Additional Locations:

Prior HLC approval required.

✓ No Change
☐ Recommended Change:

Distance and Correspondence Courses and Programs:

Approved for distance education courses and programs. The institution has not been approved for correspondence education.

✓ No Change
☐ Recommended Change:

Competency-Based Education:

✓ No Change
☐ Recommended Change:

Pell-Eligible Prison Education Program:

✓ No Change
☐ Recommended Change:

Accreditation Events

Pathway for Reaffirmation of Accreditation: Open Pathway

☐ No Change
✓ Recommended Change: TBD

Upcoming Reviews:

No Upcoming Reviews

☐ No Change
✓ Recommended Change: TBD – Probation visit

Upcoming Branch Campus or Additional Location Reviews:

No Upcoming Reviews

✓ No Change
☐ Recommended Change:

Monitoring

Upcoming Monitoring Reviews:

No Upcoming Reviews

✓ No Change
☐ Recommended Change:

Institutional Data

Academic Programs Offered:

Undergraduate Programs		
Associate Degrees:	9	✓ No Change ☐ Recommended Change:
Baccalaureate Degrees:	4	✓ No Change ☐ Recommended Change:
Graduate Programs		
Master's Degrees:	0	✓ No Change ☐ Recommended Change:

Specialist Degrees:	0	✓ No Change ☐ Recommended Change:
Doctoral Degrees:	0	✓ No Change ☐ Recommended Change:
Certificate Programs		
Certificates:	2	✓ No Change ☐ Recommended Change:

Contractual Arrangements:

No Contractual Arrangements

✓ No Change
☐ Recommended Change:

Off-Campus Activities

Branch Campuses:

No Branch Campuses

✓ No Change
☐ Recommended Change:

Additional Locations:

No Additional Locations

✓ No Change
☐ Recommended Change: