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Accreditation, Tribal Governments,
and the Development of Governing Boards at Tribal Colleges
in Montana and Washington

by

Rissa McCullough Wabaunsee

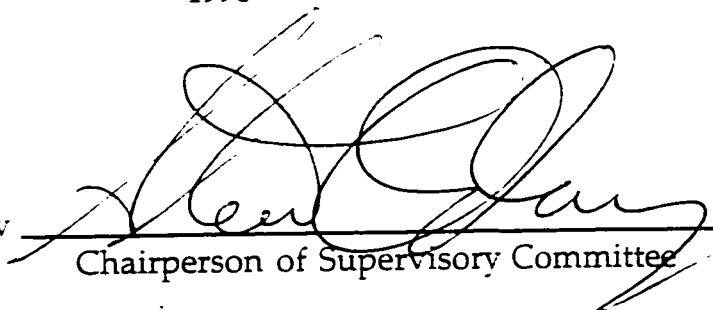
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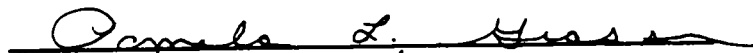
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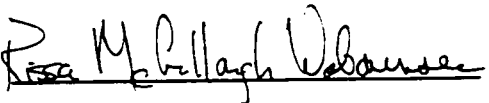
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Doctoral Dissertation

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Abstract

Accreditation, Tribal Governments,
and the Development of Governing Boards at Tribal Colleges
in Montana and Washington

by Rissa McCullough Wabaunsee

Chairperson of the Supervisory Committee

Professor Steven G. Olswang

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In the tumult of the 1960's, groups of Indian intellectuals sought to create community colleges that would be responsive to reservation Indians' needs and reflect tribal traditions. In order to qualify for Federal funds and to ensure respectability in the higher education community, these tribal colleges needed to be accredited. This study is an in-depth look at the effects of accreditation on the role of the board of trustees and the boards' relationship with tribal governments at the eight tribal colleges served by the Northwest Association of Schools and Colleges.

Approaching the topic through historical document review encompassing the years during which the tribal colleges applied for and were granted full accreditation, the study tracks a set of formal interactions between the Northwest Association of Schools and Colleges and the tribal college concerning governing boards. Special emphasis is paid to the colleges' relationship to the tribal councils that chartered them.

Open systems organizational theory directed attention to two important organizations that are found in the tribal college's environments--the accrediting association and the tribal governments. The struggle between these organizations and the effects that can be seen in the manner in which the governing board role developed and changed is most important.

The tribal colleges in this study have succeeded and flourished in this environment. The colleges have changed to accommodate accreditation

requirements. The Commission has protected the colleges from the tribal government. But, the colleges paid a price for this "protection", a reduction in their "Indianness".

These findings lead to implications for practice for tribal college board members and tribal college administrators. The relationship with the tribal government is important and must be cultivated. Sharing information is important. Developing good board members is a must. The use and timing of the Commission's clout in tribal government-tribal college power struggles is very important.

The suggestions for further study include studying this topic at the other regional accrediting agencies, studying this topic in depth by use of case study methodology, and studying tribal government management practices.

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DEDICATION

This manuscript is dedicated to husband, Richard and my sons Luke and Kevin. It was through their support that I could dream that I could do this and with their help I did.

Chapter 1 Introduction and Terms

Introduction

In the ferment of the 1960's, a group of Indian intellectuals, acknowledging the failure of most American Indian students to succeed in traditional higher education, sought to create community colleges that would be responsive to reservation Indians' needs and reflect tribal traditions (Belgarde, 1993; Bordeaux, 1989; Mohatt, 1990; One Feather, G., 1974; Wicks & Price, 1981). These colleges were to be closely tied to the people living on the reservations (Houser, 1991; Locke, 1973; Stein, 1992). Social activism on Indian reservations by the American Indian Movement (AIM) (Senese, 1991), and the "Great Society"-Office of Economic Opportunity (OEO) programs, had altered the power structure on the reservations (Barsh & Henderson, 1980; Burt, 1982; Danziger, 1984). AIM had brought young, angry urban Indians back to the reservations to address the issues of poverty and racism through social activism. This at times put them in direct conflict with the tribal governments as well as the federal government.

At the same time, on some reservations, OEO, through its Community Action Programs, had looked to non-tribal government entities to run its programs, addressing these same issues of education and economic development through community action. The founders of the tribal colleges were also looking for ways to address the problems of poverty and racism. They framed their efforts in terms of solving the quintessential Indian problem--how to be Indian and successful in the modern White world

(Badwound, 1990; One Feather, G. 1974) and found the answer in tribal community colleges.

Generally in Indian country, success had meant leaving the reservation and giving up most of the Indian ways. Indian people have had to choose between cultural separation from indigenous roots or cultural integration and often the accompanying poverty.. As with all students, members of Indian tribal groups had to learn how to be students. All students learn to stand in line, to raise their hand to be recognized and to look at the teacher when he/she is speaking. Often, success in school is built on these simple behaviors (Swisher & Deyhle, 1987). For most Indians, however, looking someone in the face while they are talking is very rude. School then becomes a conflict between the cultural manners of one group and the expected and rewarded behaviors of the other. To become very successful, the Indian student must become very good at the expected behaviors, to the point that one set of behaviors replaces the other (Plank, 1994; Swisher & Deyhle, 1987). This very small example illustrates the choice Indian students and other non-dominant culture students must make. In the Indian situation, federal educational policies practiced in Indian schools for many years demanded that traditional Indian behaviors be eradicated (Tippeconnic, 1991; Weinberg, 1977).

The founders, drawing from their own educational experiences both on the reservations and off, looked for and discovered within the philosophy

of the community college movement a model they adapted to the reservation environment. Deegan, Tillery and Melone (1985) summarize the community college philosophy as a commitment to democracy (as seen in open access and low tuition policies); program comprehensiveness (offering college transfer-general education, vocational, and remedial classes); dedication to lifelong learning; community-centered focus; and adaptability. They state that the educational institutions and systems of institutions determine who gets educated and how (p. 309). Within this philosophy, then, the founders of the tribal colleges, working in loose association with the tribal government and in closer association with a grassroots constituency (rather than through the Bureau of Indian Affairs, a church or the state), sought to create community colleges where Indians could be both Indian and successful students, and the needs of the community for higher education programs could be met.

The community college model that the tribal colleges were patterning themselves after followed the basic organizational structure of all American institutions of higher learning: " a board of trustees, which receives a charter from the state, appoints a president to administer, and approves a faculty to teach and to select students to learn" (Perkins, 1973, p. 3). Once organized, the tribal colleges quickly sought accreditation to become eligible for Tribally Controlled Community College Act (TCCCAA) funds (General Accounting Office, 1981), to legitimize their programs (Belgarde, 1993), and to become

independent from off reservation institutions of higher education (Wicks & Price, 1981).

The board of trustees is the first organizational structure put in place when a higher education institution is created in the United States. One of the functions of a governing board is to act as an interface between the institution and the external environment, thus making the governing board subject to outside pressures. The board of trustees is also highly visible, making changes in it observable and easy to identify. Boards of trustees set the policies that will direct the college or university and usually select the President of the institution. These are two extremely important functions when new colleges are established. Often that is all a new college is—a board, the policies and the President until the first faculty are hired, classes offered, and students enroll.

From an organizational perspective, focusing on the years 1974 through 1997, and relying on the documents archived at the Northwest Association of Schools and Colleges, Commission on Colleges (Commission): What was the effect of accreditation on development of governing boards at the eight tribal colleges in the Northwest region?

1. How did the tribal colleges describe the trustee function when application for initial candidacy was made? How were the members chosen? How many were chosen? How long were they serve?

2. What did the NASC, through its review of written documents, self studies and site visits, perceive as deficiencies (if any) or commendations (if any) in the area of trusteeship at the eight tribal colleges?
3. If there were deficiencies in the trustee function, did these deficiencies involve relationships between the college and other external constituencies, especially the tribal council? Is there evidence that the colleges used the requirements of accreditation to alter their relationship with the tribal councils?

These questions when answered will show the effect that accreditation had on the development of the governing boards, which in turn helps explain why tribal colleges are organized and function the way they do.

This dissertation is organized into five chapters. Chapter 1 is the introduction and explanation of terms. Chapter 2 reviews the literature that shaped the research. The review of the literature is organized into the four strands that make up the milieu of this topic. Organizational theory, Strand 1, provides the conceptual framework for this research. The framework emphasizes an institutional and open-system theory of the development of organizational structures. Strand 2 is a look at the focal organizations--the tribal colleges. Tribal governments are discussed in Strand 3. The colleges are chartered by tribal governments and most of the governing boards are appointed by the tribal governments. This relationship has become the focus

of accreditation concerns in the area of governance at tribal colleges. Strand 4 is a discussion of the process of accreditation at the Northwest Association of Schools and Colleges, Commission on Colleges. Chapter 3 is a discussion of the methodology of the study.

Chapter 4 presents and analyzes the research data. This chapter describes how each college moved through the accreditation process. This chapter also presents data concerning the charters, articles of incorporation, by-laws and tribal resolutions that make up the documents that define the relationship between the tribal colleges and tribal governments. Working from this base, the chapter continues with a description of the Commissions' and the tribal governments' actions. Chapter 5 is a discussion of the implications of the research and the conclusions that can be drawn.

Definition of Terms

Indian

Throughout this dissertation, the indigenous people of North America who have a special trust relationship derived from treaties that were signed with the United States government, will be referred to as American Indians or Indians. The federal government in much of its legislation and administrative policy refers to this group as Indians. Indians, when speaking among themselves, refer to tribal groups and use the term Indian to refer to groups of tribes.

The term Native American is being used less today. The term was never widely adopted on the reservations. The term is also losing favor because it is being co-opted by non-Indian people who wish to make a distinction between themselves and more recent immigrant Americans.

Who is an Indian and who has the right to determine who is an Indian is a complex question. "The idea of federally defined tribal membership and enrollment of members is traceable to the exigent needs attendant to distributing tribal property and winding up the affairs of the tribe" (Price & Clinton, 1973, p. 412). The Bureau of Indian Affairs and the Congress for years used and institutionalized a system of racial categories to define who was an Indian. The categories were used to determine who received federal services. A person was deemed to be Indian if they were one-quarter blood of a federally recognized tribe and had completed all the required paper work.

The tribes may impose more strict standards such as being born on the reservation, living on the reservation, or a higher blood quantum, but the federal government's definition is used most often to determine official "Indianness". "Before the passage of the 1968 Civil Rights Act, the courts often stated that the determination of tribal membership was a uniquely internal matter over which they have no jurisdiction" (Price & Clinton, 1973 , p.331). But, if the courts see tribal membership as an internal matter, Congress has long exercised plenary power over Indians. This power is

deemed a political power not subject to the judicial department of the government (Price & Clinton, 1983).

Membership in a federally recognized tribe is the general criteria used by the BIA for membership in most federal programs. A blood standard also is used alternatively for eligibility for some programs. In recent years Congress has not allowed the BIA to rely solely on a blood standard for federal program eligibility (American Indian Lawyer Training Program, 1988, p. 34).

If a tribe signed a treaty, it is generally counted among the group of federally recognized tribes. "Beginning in 1953, a series of laws were enacted in an effort to terminate Indian reservation holdings" (Haymond, 1982, p. 89). This created a group of Indians that were once recognized and who are not now because they were terminated. Some of these tribes have regained their status as federally recognized tribes. The Klamath tribe in Oregon is an example. Other tribes, including some who signed treaties, for various reasons are not federally recognized. These tribes are fighting for recognition. The Snoqualmie Tribe in Western Washington is an example.

Generally, people who have parents from two tribes or bands may only be enrolled in one tribe. A person could therefore have a long parentage from various tribes but may not meet the 1/4 rule in any one tribe. People may not be able to claim their blood quantum if the father does not claim the

child. A person could be living on a reservation, and the local people may know who he/she is related to, but because the father's name is not on the birth certificate, the child is not an enrolled member of a tribe. The variations on this problem go on and on: including adopted children; individuals affected by changes in the rules; and lost, or improperly filled out paperwork:

What is most significant...is how an individual is perceived by both himself and his community. It is quite conceivable that a person with less than one-quarter Indian blood could be accepted by tribesmen and ostracized by whites in a given community, while a full blood could live in an eastern metropolis as a fully assimilated white (Levitan & Hetrick, 1971, p. 7).

Indian Country

This is a term which may be used when one needs to describe the entire set of reservations, all tribal groups, and the common history that the group shares. A strict legal definition that is used in criminal law says that Indian Country

is defined specifically by federal statute in 18 U.S.C. S 1151. The most important provision is that Indian Country includes all land, regardless of ownership, within the exterior boundaries of federally recognized Indian reservations. Section 1551 is a federal criminal statute, but the courts have concluded that the statute's

definition also applies to questions of federal jurisdiction and to tribal jurisdiction (AILTP, 1988, p. 34-35).

Reservations

One of the identifying characteristics of the tribally controlled colleges is that the majority are situated on reservations. There are approximately 551 groups, bands and tribes of Native Americans in the United States. This number does not include native Hawaiians. This number is fluid. Various numbers are used depending on the criteria used to count. There are not 551 reservations. The Bureau of Indians Affairs administers 281 reservations. (Hodgkinson, Outtz, & Obarakpor, 1990; Tippeconnic, 1991) Indians living on and off the 281 reservations represent a total population of 1.9 million. Approximately 637,000 Indians live on reservations or trust lands (Hodgkinson, 1992, p. 1). Ten reservations account for about half the Indian population living on reservations. This points out a characteristic of reservations-that there is a small number of large reservations and tribes and a large number of small reservation and tribes.

There is no typical reservation. The variations come from tribal distinction, geographical location, and the history of the interactions the tribe or tribes have had with the federal government and the state. The similarities derive from the uniform policies that the federal government

applies to reservations, and from the fact that reservations were usually chosen for their isolation and uselessness as agricultural lands.

The infrastructure on reservations is underdeveloped. Paved roads, electricity, phone lines, running water or indoor plumbing do not exist in every part or every home on the reservation. The town in which the majority of the federal offices are located will have the better infrastructure. The most common federal agencies on the reservation are the Bureau of Indian Affairs, Indian Health Service, Bureau of Land Management and the Federal Bureau of Investigation. The tribal government offices are usually located near the federal agencies. There are usually churches of various denominations on the reservations. Most of these institutions are located at what is called the "agency". The further one gets from the agency the less developed things will usually be.

Power, relationships, and position can be understood both organizationally and geographically on reservations. For example, on the Rosebud Reservation, Rosebud, South Dakota the "agency" is located in the town of Rosebud, with a population of less than a thousand. On one hill the first government buildings were built around the old military parade ground. Behind and around these buildings are "agency" housing. (Sinte Gleska University, a tribal institution, operates out of one of these original buildings on the old parade ground.) Intermixed with the housing and away from the old parade ground is the elementary school, with housing for the teachers

and a church. Another grouping of buildings that share a parking lot includes a large general store, the post office and a church. The "trader" lives near the store, and the minister lives near the church. In another area can be found the tribal offices, some tribal housing and the tribal police station. On another hill, across a deep ravine from the "agency" is the old hospital and housing for hospital personnel. The new hospital and housing have been built a few miles away on the prairie.

Housing at Rosebud Agency is assigned by occupation, so if you live in that house you are a teacher, if you live here you are the principal. The doctors live here, the hospital administrator there. Indian people who don't work for the tribe, at the agency or the hospital live along the creek or in tribal housing. Originally, many of the people who chose to live away from the agency did so to avoid what was going on. This group has become the traditionalists or those who seek to follow the old ways. They are likely to be very poor but are also most likely to speak the language and have extensive knowledge of the tribal customs and oral history (Deloria, V. & Lytle, 1984, p. 233).

This pattern is repeated on enough reservations, especially the larger ones, that it can be used to help understand the reservation environment. Reservations often have a unique social structure that is stratified by occupation and level of assimilation. Where one lives often tells a lot about a person.

Tribe

Tribe is a very ambiguous term, used either in an ethnological or political sense. The two uses of the term intermix. Ethnologically defined tribes, bands or other subgroups as well as confederations of tribes, bands and other subgroups were given reservations. Therefore the political entity that has become "the tribe" begins with a cultural definition. Not all tribes have reservations. Groups of tribes may share a reservation and be known by the name of the reservation not the various tribes that live on the reservations. Tribes were split into smaller groups so there may be more than one reservation for that tribe.

The tribe is not to be confused with the community as in community action or grass roots. Often, "the tribe" and the community are at odds. The community may be made up of the "losers" from the last election who are working on the next recall or election. The community may also be people trying to stay out of tribal politics, but who sit on advisory boards or are involved in other ways. The community may also consist of the very traditional tribal members who have consistently maintained their distance from tribal government, insisting that they will not participate in "governing" themselves in a manner that is not grounded in the traditional ways.

Tribal Colleges

Tribal colleges refers to the group of higher education institutions, mostly community colleges, that receive funding from the Tribally Controlled Community College Assistance Act (TCCCAA). The colleges are:

Bay Mills Community College, Brimley, Michigan

Blackfeet Community College, Browning, Montana

Cankdeska Cikana Community College (Little Hoop Community College), Fort Totten, North Dakota

Cheyenne River Community College, Eagle Butte, South Dakota

College of the Menominee Nation, Keshena, Wisconsin.

D-Q University, Davis, California

Dine College (Navajo Community College), Tsaile, Arizona

Dull Knife Memorial College, Lame Deer, Montana

Fond du Lac Community College, Cloquet, Minnesota

Fort Belknap College, Harlem, Montana

Fort Berthold Community College, New Town, North Dakota

Fort Peck Community College, Poplar, Montana

Lac Courte Oreilles Ojibwa Community College, Hayward, Wisconsin

Leech Lake Tribal College, Cass Lake, Minnesota

Little Big Horn College, Crow Agency, Montana

Nebraska Indian Community College, Winnebago, Nebraska

Northwest Indian College (Lummi Indian School of Aquaculture,
Lummi Community College), Bellingham, Washington

Oglala Lakota College, Kyle, South Dakota

Salish Kootenai College, Pablo, Montana

Sinte Gleska University, Rosebud, South Dakota

Sisseton Wahpeton Community College, Sisseton, South Dakota

Sitting Bull College (Standing Rock Community College), Fort Yates,
North Dakota

Stone Child Community College, Box Elder, Montana

Turtle Mountain Community College, Belcourt, North Dakota

Three of these institutions now award bachelors degrees and one awards a master's degree. Many of the colleges retain the community college title in their names, while some have changed their name to tribal colleges. Tribal colleges is the most commonly used term when referring to this entire group. Indian colleges seems to be the next most common usage, though that is a broader term, including other schools.

There are four other post secondary institutions that are often included among the group of tribal or Indian colleges. Three began as BIA high schools. These institutions are Haskell Indian Nations University, Institute of American Indian Arts, and Southwest Indian Polytechnic Institute (SIPI). Two of these institutions continue as Bureau of Indian Affairs-run postsecondary institutions. They all have advisory boards that have a

majority of Native American members. The Institute of American Indian Arts now operates under a Congressional mandate and is no longer run by the Bureau of Indian Affairs (Brescia, 1991, p. 17). It is governed by a board appointed by the President of the United States (Congress of the U. S., 1993). United Tribes Technical College is a tribally controlled technical college located in Bismark, North Dakota. It is not included in the category tribal colleges for this paper as it is a technical college not a community college.

Confusion arises when membership in the American Indian Higher Education Consortium is used as the definition of a tribal college. The member institutions in the Consortium include all the institutions funded by the Tribally Controlled College Assistance Act, the two BIA colleges, the two vocational colleges, the Institute of American Indian Arts, two Canadian tribal colleges and tribal colleges that have not yet received funds through TCCCAA. The Carnegie Foundation for the Advancement of Teaching in its reports (Carnegie Foundation, 1993 & 1997) includes all colleges that have Indian controlled governing boards and whose enrollments are mostly Indian. Another definition uses those institutions that were recognized as land grant colleges in 1994, and that qualify for funding under the Tribally Controlled Community College Assistance Act of 1978 and the Navajo Community College Act of 1978.

More confusion arises when dealing with government numbers. Many government reports state a figure that reflects only colleges funded by

TCCCAA, Title I. Navajo Community College receives funds under Title II of the Act, and has different reporting requirements, so its enrollment and funding are often not included with the main group. The Bureau of Indian Affairs tends to lump all tribally controlled colleges, including its two institutions, together, because it funds all these colleges, even though the funds come from two separate funding streams. The TCCCAA money comes from its own legislation, administered by the BIA. Funding for the other two colleges come from BIA funds.

Besides the varying groupings of colleges, the ranks of tribal colleges has been changing over the years. New colleges have been added and others have closed. Therefore, in the literature, the number of colleges referred to depends on what year and what groupings are used.

Chapter 2 Literature Review

Introduction

Four strands of information interact in the creation of this topic. Organizational theory, the first strand, provides the direction for the research by focusing the researcher's attention on the interactions between organizations, (Evan, 1966). Tribal colleges as the focal organizations, or point of reference (Evan, 1966), are the second strand. Tribal colleges are the topic by which accreditation and tribal governments are associated. Tribal governments and accreditation then become the other two strands. This research looks at the development of a key organizational structure-the governing board-at a set of tribal colleges. The focus is on the history of the development of the governing board structure. Accreditation and the tribal sought to shape the governing boards in their image. The two images were incompatible. How the two images were incompatible and how the situation was resolved is what this study looks at.

Strand 1, Organizational Theory

Organizational theory provides the definitions and theoretical focus for this research. This study looks at the relationship between the environment and the development of structure within an organization. This research will explore the effects of two external environmental forces, accreditation and tribal governments, on highly visible and important type of organizational structure-the governing boards of eight tribal colleges during the time the

colleges sought and received initial accreditation. The research uses from a historical examination of formal interactions between the colleges, the accreditation association and the tribal governments, and examines how these interactions influenced the development of the governing board structure, in terms of how it is organized and its relationship with the tribal governments that chartered them.

Open systems, environments

In an open-systems model, an organization is seen as an organized whole, not only influenced by environments, but also dependent on them and possibly creating them (March, 1981). Open systems is an analytical model (Scott, 1992), a general framework (Hoy & Miskel, 1996) or a paradigm (Donaldson, 1995). The concept or property of an open system model that is of special use in this research is that of the environment, especially the external environments. "The environment is anything outside the boundaries of the system that either affects the attributes of the internal components or is changed by the social system itself" (Hoy & Miskel, 1996, p. 32). There are two distinct environments of organizations--the internal and the external environment. The internal environment is often studied as the organizational culture, and is anything that is inside the boundaries of the organization. The external environment is defined as anything outside the boundary of the organization (Bolman & Deal, 1991; Daft, 1992; Hoy & Miskel, 1996; Pfeffer & Salancik, 1978; Scott, 1995).

The manner in which organizations relate to their external environments and the determinants of organizational structure are inseparable. "External forces shape internal (structural) arrangements, and vice versa" (Scott, 1994, p. 123). Another aspect of environments is that organizational interaction with the environment is essential for its functioning (Scott, 1994).

There are different aspects of external environments that have been identified. Technical environments are "those (environments) within which a product or service is exchanged in a market such that organizations are rewarded for effective and efficient control of the work process" (Pfeffer & Salancik, 1978). This is in contrast to institutional environments that are "characterized by the elaboration of rules and requirements to which individual organizations must conform if they are to receive support and legitimacy" (Scott & Meyer, 1983, p. 140, p. 149). Powell and DiMaggio, (p. 337) have little doubt that community college environments are institutional rather than technical. Scott reminds us that all environments have characteristics of both.

Organizational theory also provides explanations as to the processes that are occurring concerning the development of organizational structures and the environment. From an institutional perspective, organizational structure and change derive from efforts to create or conform to categories and practices which give classificatory meaning to the social world (Powell &

DiMaggio, 1991, p. 342). Pfeffer and Salancik (1978) are interested in the interface between organization and environment, particularly how environment or context comes to affect the structures and decisions of organizations. "If we are to understand organizational actions, the process by which environmental factors affect organizational activities must be specified" (Powell & DiMaggio, 1991, p. 225).

With respect to higher education organizations, Chaffee (1991) says, the "environment is considered to be a complex organizational life support system, consisting of the trends, events, competitors, and stakeholders. The boundary between organizations and the environment is highly permeable, and the environment is a major focus of attention in determining organizational action" (p. 228). Similarly, "organizations are affected, even penetrated, by their environments, but they are capable of responding to these influence attempts creatively and strategically" (Scott, 1995, p. 132).

Meyer and Rowan (1991) suggest that organizations make themselves like other organizations because "dependence on externally fixed institutions reduces turbulence and maintains stability (p. 49). They also suggest that organizations that search for external support and stability tend to incorporate all sorts of incompatible and structural elements (p. 56). This helps explain what happened at the tribal colleges in this study. The colleges, as they were being established, needed the formal support of and thus sought charters from the local tribal governments. The colleges also had to incorporate

grassroots community demands that the college have as a purpose and a goal the inclusion of tribal culture in the curriculum and the basic organizational processes of the school. The tribal governments kept, for the most part, the power to appoint the governing board, which would often include tribal council members. As the colleges faced the need to become accredited for funding and for the legitimacy it brought, they were faced with having to incorporate new structures that were incompatible with the tribal governments' ways of doing things. This becomes the nexus of this study.

Structure and response to environment

"The structural element of the school as a social system is found in its formal organization" (Hoy & Miskel, 1996, p. 47). Organizational structures, often called forms, begin with structural dimensions that provide labels to describe the internal characteristics of an organization (Daft, 1992, p. 17).

"Formal structure is a blue print for activities which include, first of all, the table of organization: a listing of affairs, departments, positions and programs. And, one of the central problems in organizational theory describes conditions that gave rise to rational and formal structures" (Meyer & Rowan, 1991, p. 42). In an institutionalized environment, organizational structures are adopted in total, without much change from wherever they were taken, most often to help legitimize the organization (Scott, 1994).

Donaldson, in his critique of institutional theory, says that the effects of an institutional environment will most likely be on the more visible aspects of

organizations, their structures. These effects of institutional environments will be noticeable from powerful external bodies that can compel compliance and sanction non-compliance (p. 226).

Scott (1995) says that the nature of the organizational responses to demands that a less powerful organization adopt wholesale a more dominant or successful organization's way of doing things, is varied. An older view was that organizations were required to conform. More recent research suggests the demands might be negotiated; that is, an organization might attempt to shape outside requirements and/or redefine the environment. In other cases the organizations respond strategically, either by decoupling their structures from operations or seeking to defend themselves in some manner from the demands (pp. 114-115).

The normative view stresses social obligation as the basis for compliance to demands that one organization makes on another in its environment. The cognitive view emphasizes the importance of how the situation is framed and how identities are formed (Scott, 1995, p. xv). From a regulatory point of view, the organization places importance on the explicit process or rules.

The normative perspective introduces a more prescriptive, evaluative, and obligatory dimension into organizational influence interactions. Rather than just seeing rules made by another organization as monitoring and sanctioning activities, the normative view sees that the influencing agency is

prescribing and evaluating, and the reacting organization feels an obligation to respond. In the normative view, one organization determines how things should be done and then defines the legitimate means of pursuing these ends. The normative view adds the dimension that rules impose constraints but also confer rights and enable social actions (Scott, 1995, 35).

Hirsch, (1975), explored the interface between constraints imposed by the environments of two industries and the comparative effectiveness of the industries in shaping and reaching accommodation with the environmental constraints (p. 340). "In short, while we speak of the organizations interacting with their environment (in theory), most empirical studies continue to ignore the process by which this interaction occurs, both from the standpoint of the focal organization and that of the agencies in its environment (Hirsch, 1975, p. 5).

Tolbert (1985) explains the pattern of administrative structures in colleges and universities by integrating resource dependency and institutionalization perspectives in studying funding patterns. Tolbert's interest is in the relationship of environment and the development of administrative structures. She used established data bases to develop an historical analysis of sources of funding and how the funds were administered at a set of colleges and universities. The resource dependence perspective predicts that a college or university will establish offices and positions in response to funding sources. Institutionalization theory would

predict that offices and positions are established so that the college or university administrative functions are similar to other higher education institutions. Tolbert integrated these perspectives by proposing that the institutional environment defines the conditions under which increased dependency leads to administrative differentiation. She found "dependence on public or private sources of funding predicts the proliferation of administrative offices only when the dependencies are not aligned with traditional patterns" (p. 11). That is, new administrative offices would added by both public and private institutions , if the new funds came from a new source.

Dunbar and Wasiewski (1985) conducted a longitudinal study concerned with the adaptations of organizations to environmental threats or environmental disturbances. They looked at the period from 1950 until 1980 from a variety of print sources including reports, magazines and research papers. They found that "the presence of third-party actors and the positions they took are critical in determining the outcomes of the controversy" (p. 540).

Badwound (1990) studied tribal colleges from an organizational culture perspective, emphasizing the internal environment that is created by the dual nature of the external environment. Leaders of tribal colleges are expected to function effectively and efficiently in the tribal world and the mainstream world. This creates a dilemma, as often the value systems are in opposition.

Badwound studied four tribal colleges, utilizing accreditation as an indicator of their longevity. There was no explanation as to why it is a symbol of "permanence". Using an interview format, Badwound asked his respondents to explain how each college defined its environment by describing it as friendly or hostile, and by listing the major forces and actors in the environment (Badwound, 1990, p. 229).

The study does not report the results of the research at each of the four locations in a standard form. The researcher chose to honor the various styles of the respondents at each location, not wanting to impose an outside structure, but rather focusing on thick descriptions. Badwound states: "three forces emerge from this environment that have substantial influence over organizational life--tribal politics, accreditation and funding" (p. 245). He also states that tribal governments exert considerable influence over day-to-day institutional life through the college governing boards they appoint. Institutional life revolves around changes and fluctuations in tribal governance. Strategies that the colleges use in response to these environmental forces vary from college to college.

Badwound gives as an example one college that has a dual-board structure. The board of trustees is appointed by the tribal government for life. The trustees in turn appoint a board of directors that oversees the day to day affairs of the college. At another college, the president "nurtures a relationship with tribal leadership and thus the institution operates with

little interference from tribal government even though the council appoints members to the board" (p. 246).

Belgarde (1993) approaches his study of tribal colleges from a resource dependency point of view. Resource dependency looks at the technical requirements—resource streams, information flows and influence relations. Belgarde, too, is interested in the development of organizational structures. His research looks at how the college structures that arise handle the interactive effects of environmental influences and preferences of organizational members. He used a case study approach. He defines the environment, funding dependencies and legitimacy dependencies arising from that environment and presents strategies that the colleges used to manage these dependencies. He suggests that he had trouble identifying precisely where or when to look for environmental effects in administrative and academic structures because the connections between the two are hard to determine with this methodology (p. 15). One of the colleges in this study is the same as in the Badwound study and he explains the two tiered board of directors—board of trustees arrangement as a buffering strategy. Accreditation is viewed by Belgarde as a legitimacy resource that the colleges must capture. He says that the structural consequences from resource dependencies varied between the two cases depending on the college's history, relationship with the tribal government, and funding sources and may be related to the age of the colleges.

Strand 2, Tribal Colleges

Tribal colleges are organizationally similar to community colleges everywhere. The founders of the first tribal colleges chose to model their new schools after already existing community colleges. Tribal colleges as new, reservation based, educational institutions were not to be "freedom schools", or any other radical, non-traditionally organized educational enterprise. Yet, the new tribal colleges were to share with other radical educational enterprises an emphasis on instilling cultural values and the orientation to community action. But, they were to be like other institutions of higher education. Community and tribal colleges operate under a charter and are governed by a board of trustees. The colleges are also very similar to community colleges in the organization of the student services, instructional departments, and most of the curriculum.

The tribal colleges are different from community colleges because they received charters from tribal governments. The source of the charter is different, but seeking a charter from a governmental authority continues a long higher education tradition. This tradition can be traced back to France, England and Italy in the middle ages when professors sought charters from the Pope and/or from the city-states of that time (Cowley & Williams, 1991). Higher education institutional charters have evolved along the lines of business charters that form the basis of corporations. Charters are an important way of delegating authority for certain activities. The chartering

authority in effect gives away some of its power to the newly chartered organization. The new organization can operate only in very specific areas (Duryea, 1991). The charters continue in perpetuity and grant the chartered organization the freedom to set up and maintain rules "which in effect constituted internal and private governments" (Duryea, 1991, p. 4).

External governing boards, which are ultimately accountable for all aspects of the college's operation (Gleazer, 1976), are another traditional characteristic of American higher education which the tribal colleges continued. Governing boards distance the chartered organization from the government organization that chartered it (Duryea, 1991). Governing boards have legal responsibility for the institution. Potter (1976) lists tasks for higher education boards of trustees, including preserving institutional independence. "The trustee must resist encroachment on its independence from any possible direction" (p. 6). Trustees also engage in public relations tasks as the representative of the community served by the college. Duryea (1991) calls this the essential dualism between academic autonomy and public accountability (pp. 15-16).

Origins

The history of the tribal college movement begins with the establishment of Navajo Community College in 1968. This event marked the beginning of a mini-movement within the larger community college movement that was sweeping the country at this time. The tribal college

founders saw in community college curricular functions the answers to some of the educational, social, and economic problems on the reservations. The multiple functions of collegiate (academic transfer), career (vocational-technical), remedial (developmental), community service, and continuing education (Cohen & Brawer, 1996, p. 24), all located in a college situated in the community and with a philosophy of open access, was very compelling.

Tribal colleges are different from other community colleges, but as a group they are very similar to each other. The tribal colleges have taken the community college concept one step further by emphasizing their desire to support, revitalize, (Belgarde, 1993), transmit, retain and develop (Mohatt, 1990) tribal culture. It was also recognized that the colleges were founded in direct response to the frequent failure of Indian students in other off reservation higher education institutions (Belgarde, 1993; One Feather, G. 1974; Mohatt, 1990; Wicks & Price, 1981). William Demmert, Director of the Office of Indian Education Programs (OIEP), Bureau of Indian Affairs, Department of the Interior, while testifying against the need for the colleges, stated that there was a "40 to 44 percent dropout rate among the general student population across the country. For Indian students the drop-out rate is, among the general student population, 75-77 percent" (Congress of the U. S., 1978).

Though each tribal college has a unique history, there are enough similarities to generalize about them. Stein (1992) described the colleges'

history as a succession of waves that swept over the reservations. Within each wave there are at least three phases. The first phase is the years before the college opens. This period, especially for the first wave colleges, occurred in the tumult of the late 1960's and early 1970's. Founders were talking and dreaming at conferences and meetings. They were meeting in community action forums. Things were bubbling on the reservations as new Office of Economic Opportunity (OEO) programs were altering the power structure (Philip, 1986, pp. 196-197) and bringing educated Indians back to the reservation (Ortiz, Harris, Bennett, & Burnette, R., 1986, p. 220). This is the period where eventually a group of visionaries assemble enough support to reach critical mass and begin college operations. Often, it is at this point that colleges are chartered.

The second phase begins when the college begins offering an eclectic mixture of extension and adult basic education courses. Generally, what is being offered depends on what is funded. The college is usually operating under a bi-lateral agreement with one or more higher education institutions such as a nearby community college which, largely determines what it can do.

In the third phase, the colleges receive Tribally Controlled Community College Assistance Act (TCCCAA or the "Act") funding and begin the accreditation process. At this point the colleges begin to develop more integrated, stable courses and programs. The minimal support, less than half of the operating budget (McDonald & O'Donnell, 1994, p. 42) from the Act is

enough to sustain core operations. The colleges, once accredited, usually drop the bi-lateral agreements with other institutions. The years between talking about, chartering and funding shapes the colleges' first years and delineates the phases. The first wave colleges were without TCCCAA funding for eight years. The newest colleges are founded knowing that TCCCAA funds will be readily available. The newer colleges usually receive funding within a few years, depending on how quickly they achieve the minimum level of accreditation required by the Act. The minimum level is usually Candidate for Accreditation.

The first wave of colleges to open included Navajo Community College (now Dine College), Oglala Lakota College, Sinte Gleska University, Turtle Mountain, Standing Rock (now Sitting Bull) and Deganawidah-Quetzalcoatl (D-Q) University. This group is important because the presidents of these colleges were the founders of the American Indian Higher Education Consortium (AIHEC) in 1972 (Locke, 1973). Stein (1992) concludes that the "first wave" colleges "became the role models which later tribal colleges followed in their development. Without the success of the first six, it is questionable whether a Tribally Controlled Community College Movement could have survived beyond the early seventies" (p. 19).

Of this group, three are on Sioux reservations--Sinte Gleska University, Oglala Lakota College, and Sitting Bull College. These three colleges and Turtle Mountain Community College are located in North and South Dakota.

Within this first wave are two tribal colleges that are unique colleges. Dine College is exceptional because of its funding structure. D-Q is unique in just about every way.

Dine College is unique even though it opened the door and became the model for the remaining colleges. The pattern was imitated because it was successful. Dine College is unique because it alone is funded separately, under its own section of the TCCCAA and extensive building funds have been provided. The fact that it was the first tribal college is not all that surprising. The Navajo reservation is the largest reservation both in land and in population. Navajos had been experimenting with alternative forms of educational systems prior to the opening of the college.

Dine College is exceptional because of its funding structure. In 1971, federal legislation was passed that provided permanent funding for the college's operation and facilities. Funds are allocated on a "needs" basis rather than on full time equivalency (FTE) enrollment formula (House, 1974; Opelet, 1990; Stein, 1992). It was thought by some in Congress that Navajo Community College was to be the tribal college established to handle the higher education needs of all Indian people (Stein, 1992, p. 114). This may explain the largesse and the passage of separate funding legislation. This may also explain some members' of Congress reluctance to fund any other tribal college. Local BIA officials were very supportive and are counted among the founders of Dine College.

D-Q is different from other first wave colleges and all tribal colleges that have opened since. D-Q is not located on a reservation; rather, it is located on the site of a surplus army communication center seven miles west of Davis, California. It began as a Chicano-Indian University in 1971. Its founders were not community college advocates. Forbes, a D-Q founder and essayist, wrote:

In many respects, the development of a multitude of separate, isolated two-year Indian colleges is a *disservice* to the Indian people. Only one or two such colleges can ever develop the size necessary to hire outstanding faculty or to develop a complex program. The tribally-controlled junior colleges can be viewed as an asset if we think of them as meeting strictly vocational-remedial-preparatory needs and if we do not fall under the illusion that they are meeting all of the higher education needs of Indian people (1979, p. 80).

"Forbes proposed an inter-tribal, four year university that would provide a wide range of educational programs and services designed specifically to meet the needs of Indians" (Oppelt, 1990, p. 27). In the Forbes's plan that Indian university was to be D-Q. D-Q recognized the common aboriginal roots of Chicanos and Indians so that when D-Q opened it was a Chicano-Indian university. In 1977, all Chicano board members at D-Q resigned, leaving a

board composed entirely of Indians (Lutz, 1980). Charters were received from the Hoopa Valley and Soboba Indian Tribes, thereby making D-Q eligible for federal funds the first year they were available. Olivas (1982) says that this reconstitution was to secure federal funding (p. 7). D-Q has since struggled to enroll a hundred students each year.

Stable funding became the early colleges' first priority. The Tribally Controlled Community College Assistance Act was passed in 1978, mainly through the lobbying efforts of the college presidents (Pease-Windy Boy, 1994). The passage of the TCCCAA was a triumph for the colleges and AIHEC. It provided a stable (dependent on funding by Congress) funding source. But, the Act institutionalized two sets of problems. The first is having the BIA request and distribute funds for the colleges from Congress. The second set of problems involves the administrative rules the BIA established for the disbursement of the funds.

AIHEC attempted to avoid the first set of problems by asking Congress to give the colleges their own authorization and funding source, separate from the BIA. They were not successful. The Synder Act of 1921 authorized program services to Indian people to be delivered by the BIA, and it remains the law authorizing financial support for the BIA education system (Clifford, 1974). Congress was unwilling to do anything that appeared to change the BIA's responsibilities and therefore would not pass a separate act, so TCCCAA funds are passed through the BIA.

The BIA opposed the idea of founding and funding the colleges. In 1978, at hearings before the House of Representatives, the director of the Bureau of Indian Affairs, Indian Education Programs, recommended against the enactment of the Tribally Controlled Community College Act. He stated that the BIA had authority and adequate funds to establish tribal colleges. In later testimony it was brought out that, with the priorities established the way they were, the BIA was not funding all the existing colleges and did not anticipate increasing funding levels (Congress, 1978).

The BIA had developed a policy that mainstreamed Indian students into established colleges and universities. Under this policy, students were to receive financial aid and the institutions were to receive funds to provide support services and all of this was to occur off the reservations. There were also four BIA institutions that students could attend. This policy had been ineffective and resulted in few students attending college. Among those who did attend college, there were high dropout rates. The Director reported that the BIA estimated that at this time the proportion of Indian students dropping out of college could go as high as 9 out of 10 (Congress, 1978). Even though the policy was not successful, the BIA did not want to change it. The BIA saw the founding of tribal colleges as challenges to its established policy (Stein, 1992, p. 115). The BIA continues to be criticized for its lack of enthusiasm when seeking funds for Tribal Colleges.

The second set of problems arose from the regulations developed and insitutionalized as the TCCCAA was being implemented. These problems stemmed from the definition the BIA chose to use for "institution of higher education". Implied in this definition is that institutions of higher learning are accredited. This assumption on the part of BIA staff members imposed on developing tribal colleges an almost impossible set of standards to meet. These standards are derived from and represent the dominant view of what an institution of higher learning should look like and how it should operate. The need to be accredited in order to receive TCCCAA funding became a critical determinate of how the tribal colleges developed.

Following quickly on the first six's heels, almost concurrently, six colleges opened in 1973. Seven more colleges opened in the years 1975 to 1978. These are the second wave colleges. All these colleges opened before TCCCAA funding was available in June, 1980. Not all colleges immediately received TCCCAA funding. Of the twenty -one tribal colleges in existence in 1979, only eleven received funding under the Tribally Controlled Community College Assistance Act in 1980. Five first wave colleges, Standing Rock Community College, Sinte Gleska, Ogiála Lakota, Turtle Mountain and D-Q received funding and six second wave colleges, Blackfeet Community College, Dull Knife Memorial College, Salish Kootenai, Granado (now closed) and Little Hoop, received funding that year. Five more colleges received funding the next year. By 1982, all colleges had been funded. The Alaska

tribal colleges were subsumed by the state system and were never funded by TCCCAA, even though one college was awarded funds.

The establishment of new colleges has slowed with six more colleges opening in the third wave in the 1980's and 1990's. They have all qualified for TCCCAA funding. Some colleges have changed their names over time: Navajo Community College is now Dine College; Standing Rock Community College became Sitting Bull College; Lummi Indian School of Aquaculture became Lummi Community College and now is known as Northwest Indian College and Little Hoop Community College, is now Cankdeska Cikana. One college—Granado, has closed. Most recently Nebraska Indian Community College has split into two institutions when one of the three founding tribes withdrew to start its own college. The new college is Little Priest Tribal College.

Tribal college characteristics

Wicks and Price (1981) write that tribal colleges share the following general characteristics:

1.) Tribal colleges are located on Indian Reservations. Tribal colleges are similar in some ways to other rural community colleges. Rural community colleges tend to be smaller, poorer and serve a wider geographical area than urban community colleges.

2.) Tribal colleges are chartered by a band or tribe of federally recognized Indians. The founders of Dine College began this pattern when

the College sought and received a charter from the Navajo tribal council (Oppelt, 1990; Stein, 1992). The charter represents many things to tribal colleges and to the Indian communities on the reservations. It was a public affirmation of a dominant relationship that was to exist between the college and the tribe. Often the charter was a statement of the hope that a community college could be built. The charters were a political assertion of the tribes' sovereignty and an important exercise in self determination, allowing the tribal governments to "tweak" the federal government in the continuing battle to wrestle control of the basic operations of life from the BIA.

Through the charter, the college acknowledged that it was part of the tribe and the reservation, proclaiming that it was an Indian organization first. This was a very important political statement for the college to make. It, in some ways, reassured the tribe that the college was not going to take over or compete with the tribal organization. Exactly how the tribe and the college are to be associated is still being worked out: this relationship is very volatile.

3.) Counted among the founders of tribal colleges was a group of educated Indian men. (Belgarde, 1993; House, 1974; Lutz, 1980; Mohatt, 1990; One Feather, G., 1974; Oppelt, 1990; Stein, 1992) Many of these founders found employment as presidents.

4.) Tribal colleges rely on the Tribally Controlled Community College Assistance Act of 1972, now P. L. 98-192, for "base funding" (Stein, 1990). This

act has stabilized the funding of tribal colleges but at a low level, thus requiring the tribal colleges to seek the majority of their funds from other sources. The other sources include grants and contracts, private foundations, and tribal funds, the largest fund generating category being grants and contracts. Tuition is not a significant source of revenue.

5.) The curriculum reflects the colleges' desire to provide collegiate, career, remedial and continuing education courses. The colleges are especially sensitive to their need to provide community service classes. The tribes strive to do this in a culturally sensitive and supportive manner (Wicks & Price, 1981) by creating Indian studies courses and integrating "Indian" content into courses.

6.) The majority of the students who attend are Indian, though non-Indians who live on or near the reservation attend. "For Sinte Gleska, this group regularly comprises about one-fourth of the total student body" (Houser, 1991, p. 5). In 1991, 12,000 students attended tribal colleges (Lewis, 1994, p. 43). These students generated 4,729 Indian Student Count (ISC) (Ambler, 1996, p. 40). ISC is a full-time equivalency formula that counts only Indian students. In 1995, the ISC was 6,316 (see Appendix A for enrollment and funding trends).

Four of these characteristics have altered the shape and form of the colleges: funding patterns, governance, the curricular objectives, and the accreditation process.

Funding

Funding shapes the colleges. The funds that were available at the time the college was developing often determined the initial and continued mission or focus of the college. Speaking of the first wave colleges, Stein (1990) said "In many instances, this effort to secure resources retarded the natural growth and development the tribal colleges would have enjoyed if adequate income had been available" (p. 3). Stein continues by saying that tribal college administrators must still devote inordinate amounts of time and effort to secure necessary funds because the funding from TCCCAA is minimal.

Dine College was the first and in many ways the luckiest, because it was able to get specific funding that addressed the needs of the college. The law provided money to build a campus and continued funding based on need. Dine College has been able to maintain its separate funding status. Other colleges have had a different funding pattern.

Early years

From 1971 until the first TCCCAA money was disbursed in June, 1980, the tribal colleges were generally associated with other institutions under bilateral agreements. They also received funds from various government agencies in the form of grants and contracts. The colleges were able to access developing institutions' money under Title III of the Higher Education Act. This source of money was very important as well as a source of friction. One

Feather, G. (1974) and Clifford (1974) credit access to this money as fueling the initial development of the colleges. Without these funds, the colleges would not have bridged those critical years when they were starting up and the TCCCAA funding was not yet available. "Title III has been a pivotal section of the Higher Education Act in terms of the origin and development of tribal colleges. "Title III actually served as the vehicle for starting tribal colleges through bilateral relationships with non-Indian institutions" (Shanley, 1991, p. 19). Others (Houser, 1991; Olivas, 1982; Oppelt, 1990) say that the distribution of the funds created many situations where tribal colleges, which were not awarded their developing institutions funds directly, chafed under the supervision of colleges who had control of "their money".

Another important source of funds in the early years was OEO funds. The Office of Economic Opportunity had successfully kept the administration of its funds for Indians out of the BIA's hands . The OEO had established an Indian desk that administered funds to Indian projects. This source of federal money independent of BIA provided the funds for various tribes to initiate actions that were not approved of by the BIA but were very important to tribal members (Belgarde, 1993; Clifford, 1974; One Feather, 1974).

The BIA had lost an internal governmental power struggle to control the funds when OEO chose to establish an Indian desk to administer funds going to reservations. Under this arrangement, funds were for the first time coming to the reservation directly from an agency other than through the

Bureau of Indian Affairs. Not only was the money coming from the OEO, but it was coming in the OEO manner. OEO, and its development arm, the Community Action Programs (CAP), emphasized community involvement and direct funding of locally controlled programs. In this case, it meant the tribes and the reservation community were, for the first time, asked to identify problems, propose solutions, and receive funds to put those solutions into action. The tribes and the community learned that they had the expertise needed to perform these actions. That may be the greatest accomplishment of this program on Indian reservations (Clifford, 1974; One Feather, G., 1974). Working for OEO programs provided a means for many educated Indians to come back to the reservation (Clifford, 1974, p.18).

The community college idea often gained exposure as community development activities identified education as a major issue on the reservations. "A national movement in postsecondary education which strongly influenced the form of self determination in Indian higher education in the 1960s and 1970s was the rapid growth of community colleges" (Oppelt, 1990, p. 32). Providing post-secondary classes in a community college structure was a positive solution that addressed the problem outside of the normal educational system, that on the reservation is dominated by the BIA.

TCCCAA years

In June 1980, the BIA awarded the first TCCCAA funds. This began an era of stable if minimal funding for higher education on the reservation. But life did not become easier for the colleges. The BIA had established a complicated procedure that slowed down and made access to the TCCCAA money difficult (Olivas, 1982). Colleges had to meet the BIA's definition of "feasible". The BIA's feasibility studies determine whether there is, in its opinion, justification to encourage, maintain and fund a community college. Tribal members and the tribal government had already answered in the affirmative this question for themselves. Official BIA "feasibility" also requires the colleges to be an independent accredited institution (Bureau of Indian Affairs, 1982, p. 1). Therefore, to be eligible to receive funds, the colleges must be accredited, at least at the candidate level.

The BIA had created a complex, redundant system with a "catch 22", where, to be feasible, the colleges must be accredited, and to be accredited they needed stable funding that could only come from TCCCAA money (Olivas, 1982, p. 8). The BIA established a quasi-accreditation system, whereby its evaluation teams looked the colleges using criteria that were similar to accreditation standards (BIA, 1982). The teams were made up of people recommended by the colleges. AIHEC provided staff support to the teams (Olivas, 1982). The feasibility study process and standards were not very precise. BIA staff members often overturned the feasibility committee's

findings (BIA, 1982), delaying the funding of early tribal colleges. Today, all colleges that receive TCCCAA funds are accredited, most as fully accredited institutions. Feasibility studies are still required for new institutions.

The BIA is the agency responsible for evaluating the tribal colleges' budget requests. The BIA budget request is presented to the federal government as a total package, and incorporates the needs of the tribal colleges. All programs on the reservations are eventually aggregated into one amount. The BIA has a budget ceiling it must work within. Since TCCCAA money is funneled through the BIA, so it counts it as part of its entire funding amount. The BIA usually asks for much less than has been authorized in the legislation. Even though this is not an uncommon practice it irritates tribal college administrators. In 1993, the TCCCAA received authorization for \$33,895,680. The BIA requested and the Colleges received \$17,444,712 or 48.53 % of the authorized amount (McDonald & O'Donnell, 1994, p. 41). This results in a situation where the BIA, which is at best still cool to the idea of tribal colleges (Congress of the U. S., 1990), establishes the priorities and is supposedly the advocate that testifies before the appropriations committee. The total amount appropriated to the colleges has grown very slowly while the number of colleges and the number of students has grown rapidly, resulting in a steadily decreasing amount for each FTE. This has meant that many colleges, just to stay even, must increase their FTE. As the total number of students in all tribal colleges increases the per student

funding decreases. This is because total enrollment for all tribal colleges is divided into the total amount of money appropriated. The amount appropriated is not growing as fast as the enrollments. Therefore in order for a tribal college to receive the same amount of funding as the year before, it must increase enrollment (see Appendix A for enrollment and funding trends).

The colleges refuse to support any attempts to limit the number of institutions that could possibly qualify for funding. The colleges remain each others' strongest supporters. The colleges depend on each other as the best source of support and information for their unique situation.

On a day-to-day basis, colleges share copies of institutional documents--curricula, policies, forms, internal studies, grant proposals--as part of their commitment to mutual support. This sustained commitment is particularly noteworthy; it occurs despite the fact that the tribal colleges must regularly compete against each other, contesting for limited federal and foundation grant dollars. (Houser, 1991, p. 3)

They often function as fostering institutions to new institutions, even though every new student means fewer dollars for them.

As a final effort to achieve an adequate, stable and independent for the BIA funding source, the colleges pursued land grant status. They achieved the status and are now eligible for Department of Agriculture funds targeted

for land grant colleges. However, the colleges have not yet been awarded an initial allotment of land or money that all other land grant colleges had been awarded in the past, which had been their hope.

The bulk of the budget for the tribal colleges comes from grants and contracts, private foundation funding, and tribal funds. The grants and contracts are the largest category of funds for most tribal colleges. The colleges have become adept at writing proposals to fund programs. This has put them in direct competition with the tribal government. There has been some effort by tribal governments to require all tribal organizations (including the college) to submit proposals through the tribe. The tribe would thereby capture a piece of the administrative and indirect costs that go to the college as well as being able to control what projects are sought, and most importantly, who is hired to run the project. The colleges have been more successful than the tribes in gaining grants and contracts and do not want to give up their autonomy. It is a point of contention. Besides tribal-college politics, the colleges suffer the problems of any organization that depends on soft money (Clifford, 1978, p. 27). The colleges are in a never ending loop of writing the next proposal to keep the funds coming in. The grants are often for targeted purposes, so the development of the college and its facilities is very spotty. Tribal colleges receive some money from the tribal governments. The amount varies from tribe to tribe. The most significant and usual form of support is in the form of "in-kind" donations of building space.

Governance

The colleges are similarly organized, in part, because AIHEC, which provides a forum for the college presidents to meet quarterly (Houser, 1991), has fostered a common model. The colleges are generally organized in a hierarchical fashion, with a president who oversees a college that is divided into three large areas: student services, academics, and business services. There may be other administrative areas, depending on the college, for foundations, grants and contracts and extension classes, including distance education. All tribal colleges have governing boards. Most often the boards are appointed by the tribal government. Governing boards are often required to have tribal government officials as members. Some boards are elected by tribal members. The terms of the board members are generally from two to four years.

Meyer and colleagues (Meyer, 1980) looked at data on the administrative structure of school districts, elementary schools, and secondary schools. The data showed that schools and school districts which depend more on federal funding develop disproportionately large administrative structures as compared to schools relying primarily on state funding (as cited in Scott, 1995). Tribal colleges tend to fit this same pattern, with large administrative structures, which reflects their dependence on grants and contracts.

Oppelt (1990) emphasizes the two main approaches to delivering services that have developed in tribal colleges. He says that tribal colleges are either centralized, with a main campus, or decentralized with many local units. Oppelt explains this as a propensity for the colleges to organize themselves in a manner that fits with their own cultural tendencies and the geography of the reservation.

The colleges may deliver services from a centralized campus. Dine College, Salish-Kootenai College, and Northwest Indian College are good examples. These colleges are among the largest. Salish-Kootenai College and Navajo Community College have campuses that were built specifically for them. Northwest Indian College's campus has grown up from the available resources and is a collection of modular units and frame buildings linked by a system of decks and uniform painting. These colleges also have large satellite programs in outlying areas. The administrative staff is located at the main campus.

Unlike the conventional institution, the Dakota system is decentralized geographically in order to provide students with course offerings on a rotating basis, in the far flung Indian communities of the reservation. The Dakota system colleges are closely integrated with job generating agencies and ongoing community economic development (One Feather, G., 1974, p. 39). The Dakota system colleges are examples of the "noncampus" college that became popular in the 1970s (Cohen & Brawer,

1996, p. 119). The two main examples are Sinte Gleska University and Oglala Lakota College. As noncampus colleges, Sinte Gleska University and Oglala Lakota College have program directors or associate deans who take responsibility for separate geographical regions. These colleges emphasize rapid change in course design. The Dakota system colleges link this to the needs of local job generating agencies and community development activities.

Curriculum and mission.

The tribal colleges share a common dual mission that separates them from other community colleges. The colleges attempt to interweave tribally distinctive cultural elements into the curriculum (Wicks & Price, 1981). One Feather (1974) sees their mission as balancing skill training and cultural learning, with one not interfering with the other, but not really complimentary either. Locke (1973) describes the mission as tribal colleges striving to meet the needs of the tribal-specific reservation people, by reinforcing tribal-specific value systems in their educational modalities. Boyer (1990) describes the curriculum at tribal colleges as culture-based. "All tribal colleges reinforce traditional Indian cultures. Not seen as just another area of study, Native American traditions and values are at the heart of each tribal college's structure and identity" (p. 26). At the same time, "like all community colleges, tribal colleges are flexible and responsive institutions" (Boyer, 1993, p. 10).

Bad Wound (1991) says that problems have arisen in the implementation of the mission to sustain tribal identity, while providing knowledge of the mainstream society. There is a tendency not to see the two tasks as equally important. There has been a lack of clear definition from administrators about what it means to promote tribal culture. This situation has been made worse by the demands of accreditation agencies. The underlying problem is the "lack of conceptual tools to inform the teaching of tribal cultures" (p. 17). Houser (1991) attributes the problems to scarcities of qualified staff and appropriate instructional materials.

Stein (1986) identified three patterns that the colleges have developed to implement the mission of sustaining and preserving tribal identity and culture. One approach to this task is to develop a tribal specific Indian studies program that emphasizes the particular culture, language and history of the reservation where the college is located. This makes this type of Indian studies program very specialized and tailored to the locality. Dine College is the leader in this type of curriculum and has expanded into developing a broader Indian studies department (p. 3). Sinte Gleska University, Oglala Lakota College, and Salish-Kootenai College have also created large Indian/Tribal Studies programs.

A second approach is to have a small Indian/Tribal studies program. Thirteen colleges offer associate degrees in Indian studies in this more limited manner (Slater & O'Donnell, 1995, p. 39). The third approach is the least

common. For example, at Turtle Mountain Community College, an attempt is made to integrate tribal specific information into all areas of the curriculum. There are Indian/Tribal studies classes offered but there is no degree program. Indian studies are incorporated into the core curriculum, especially in the transfer programs. Northwest Indian College is another example of a college taking this approach. The predicament is how to integrate tribal culture into the institution and classes and still fulfill the general studies requirements for transfer. "The study of language and culture, however, retain their centrality no matter where they are housed" (Houser, 1991, p. 8).

The associate degree is the most common academic award. "The trend, especially within the past ten years, has been to expand the range of programs and provide more services for students" (Boyer, 1993, p. 10). Twenty-four of the twenty-five tribal colleges offer associate degrees. Most tribal colleges offer degree programs in business (23), liberal studies (22), protective services and human services (20), Native American Studies (17), computer science (15), education (14), and tribal management (12). "The popularity of these programs may be related to specific tribal needs, economic progress (business and computer science), social assistance (protective services), strengthening culture (Native American studies), improving schools and student transfer to other colleges (liberal studies)" (Slater & O'Donnell, 1995, p. 39).

"Three factors drive curricular, research and service activities: tribal needs, instructional costs and Indian student enrollment. When one or more of these factors are unfavorable, colleges usually decline to provide the activity" (Slater & O'Donnell, 1995, p. 41). Belgarde (1993) found at the two colleges he studied, Turtle Mountain Community College and Little Big Horn College, that initially "courses and curricula were offered if targeted funding for them was available and dropped if funding ceased. Quantity of funding became less predictive of the courses offered over time" (p. 160). The need to match the colleges' curriculum to the mainstream colleges to which students will be transferring drives the decisions now. Vocational class offerings are determined by the availability of jobs locally. Houser (1991) states that tribal colleges choose their curricula by determining, through consultation with their communities, what is appropriate and cost effective (p. 8). Duchene (1981) says that the

In their efforts to meet these external requirements (accreditation) and fulfill a complex goal of serving community needs and achieving regional and national academic respectability, local people had to surrender much of their control over courses and programs" (p. 26).

Four of the colleges offer bachelor's degrees, –Oglala Lakota University, Sinte Gleska College, Salish-Kootenai College and Sitting Bull College

(Standing Rock College). Two institutions confer masters degrees, Oglala Lakota College and Sinte Gleska University. These two colleges are located on the Pine Ridge and Rosebud Reservations. The two reservations are contiguous but very separate. They are among the ten largest reservations, and the various Lakota (Sioux) Tribes counted together are the third largest tribe.

By offering what the community needs, in locations close to their homes, and in a culturally sensitive and supportive manner, the tribal colleges have been successful in attracting students and that these students are "overwhelmingly satisfied with the programs and services offered at these developing institutions" (Wright, 1986, p. 16). Wright also reported the "tribal college has clearly emerged as a most significant and often preferred provider of postsecondary educational services (for Indian students in Montana)" (p. 3). "Approximately 103,000 American Indians were enrolled in college in 1990. Tribal colleges enrolled 12,000 students and the figure is increasing by 10 % a year" (Lewis, 1993, p. 39). Darden, Bagaka, Armstrong and Payne (1994) found that "Indian student representation in institutions of higher education is greater in states with tribal colleges" (p. 67).

Besides the day to day struggle of running a college on starvation funding; developing appropriate curriculum; finding qualified faculty to teach; recruiting, enrolling and keeping students; and developing and maintaining a physical plant, tribal college administrators must continually

work out their relationship with tribal governments. The tribal governments tend to view the colleges as their creations and therefore under their control. The colleges acknowledge their allegiance to the tribe through the charters and board membership. At the same time, the colleges want and are required by accreditation standards to be autonomous. The relationship hinges on the tribal governments' understanding of control and autonomy and this is often problematic.

Strand 3, Tribal Governments

“The government of American Indians living on reservations is the product of literally thousands of treaties, federal laws, and judicial decisions, and myriad rules and regulations issued by federal agencies over more than a century and a half” (Livatan & Hetrick, 1971, p. 19). The federal government attempted to wipe-out all pre-contact culture, especially any cultural characteristics that might contribute to Indians developing a fighting force. Pre-contact inter-tribal organizing and governing structures were systematically destroyed and leaders were often separated from their power base (Brown, 1978). “Much of the history of the relations between Indians and the federal government can be recounted in the creation, destruction and recreation of tribal government and tribal leaders” (Price, 1973, p. 677). Early tribal councils and agency business councils have been described as administrative conveniences (Deloria, P. S., 1968) designed to sugar-coat Bureau of Indian Affairs policies by giving the appearance of local

involvement. But, the attempt to destroy the culture and assimilate Indians into the dominant culture generally did not succeed. The tribes retained the right to form a government as the first element of sovereignty (Pevar, 1992).

Most tribes have adopted written constitutions. "A few tribes are theocracies. Some tribes determine their leaders by heredity, but most tribal officials are elected" (Pevar, 1992, p. 82). In the 1930's, the tribes were given the opportunity to restore tribal governments under the direction of the Department of the Interior (Barsh & Henderson, 1980; Burt, 1982). Price (1973) characterizes the Indian Reorganization Act (IRA) as "the noble attempt to put Humpty-Dumpty back together again" (p. 676). About half of the present day tribal governments operate under Indian Reorganization Act constitutions. The Bureau of Indian Affairs selected the groups on each reservation that wrote the constitution (One Feather, V. ,1975). The federal government reserved the right to veto laws, codes, ordinances and financial arrangements. It is left to the local reservation superintendents to determine how to use this veto power. "In the twentieth century, the Bureau of Indian Affairs has been charged with a similar role of creating tribal governments and tribal leaders with whom it can feel most comfortable" (Price, 1973, p 676). The resulting constitutions are all very similar across tribes (Barsh & Henderson, 1980). V. One Feather (1975) writes that there are critical flaws in the tribal constitutions that have laid the foundation for the raucous tribal politics that are common today. O'Brien (1989) says:

Unlike federal and state governments, most IRA constitutions do not provide for the separation of powers. The executive, legislative, and in many instances, judicial functions are performed by the governing board (p. 83).

LaDonna Harris (Ortiz, Harris, Bennett, & Burnette, 1989) says "Under the Indian Reorganization Act, tribal governments never really functioned" (p. 223). Price (1983) believes that most tribes have operated well under this unified system (p. 287). O'Brien (1989) says just the opposite:

Without a system of checks and balances, the council's authority may become overly powerful and unresponsive to the needs of all tribal members. A related criticism is that tribal councils too often involve themselves in the administrative and business operations of the tribe (p. 294).

Some tribes, most notably the Navajos, have drafted constitutions similar to IRA constitutions, but chose not to have them approved under the IRA to avoid the need to have the Secretary of Interior review and approve every tribal law. These tribes gained autonomy but at the price of not being eligible for certain federal funds available to IRA formed governments (Pevar, 1992, p. 83).

It can't be denied that the Indian Reorganization Act extended a good deal of power and responsibility to tribal

governments. Even without the great fund of home-rule authority, the basic powers of organization, negotiation, property control, and other existing functions previously exercised by tribal governments provided Indian communities with a firm foundation to build on. To these must be added the benefits of business incorporation, complete with access to a revolving credit fund. The situation was not ideal, but it was a pretty good bargain, nevertheless (Deloria, V. & Lytle, 1984, p. 145).

Added to this mixture were the pressures put on tribal government structures during the Office of Economic Opportunity years. The Great Society legislation had made tribes eligible for federal money other than that which was specifically designated for Indians. This was a major change, but it also necessitated changes in the tribal governments. Tribal governments had to create bureaucratic structures, often non-profit development corporations, to be eligible to receive OEO funds. The tribal governments in many cases became major employers on the reservations. An important by-product was increased legitimacy as tribes administered federal projects. As the tribal governments' image changed their position as permanent governments interested in regulating reservation activities including the possibility of taxing, they became more than a service delivery organization (Deloria, P. S., 1968).

The organizational mismatch that arises from imposed forms of governments on closed, family based reservation organizational systems often keeps the tribal governments at the center of a political storm. Generally, reservation inhabitants distrust representative government. The reservation inhabitants also pay close attention to what is happening in their families, and among their relatives, friends and neighbors. Tyler (1973) noted that the "close kinship groups, the natural communities, and other social groupings are still of binding importance in the majority of Reservation societies. Both missionary and Government have fought these institutions as hindrances to progress" (p. 144).

The people also pay close attention to reservation events and the people involved in them. This is a closed system, that looks inward at itself and that ignores and minimizes the outside influences that seek to dominate or destroy them. In organizational terms, reservation people live in a reservation environment that is at once permeated and dominated by outside forces, and at the same time is closed in important ways to them.

The closed part of the reservation system is closed to outside forces, but almost totally open to the people and activities within the system. Thus, tribal governments, being part of the closed system, are subject to intense scrutiny and discussion by all members of the general reservation population. "The tribal (law and order) codes are generally available to the members and are widely read and discussed" (Price & Clinton, 1983, p. 287). Tribal politics

often become an intimate and family based squabble for control of the tribal government and the large number of jobs it oversees. Of course, each tribal government is different and the largest and best organized tribal groups have solved these problems to a degree that allows them to operate more effectively.

Over time, tribal powers have grown from the original ones approved by the Bureau of Indian Affairs. Tribal powers have been extended by the interpretations of sovereignty in the courts. The extension of the powers has been on an individual basis depending on the tribe, what treaty rights each has, and the state in which they are located. The right to charter corporations, including colleges, has been exercised by the tribes on the grounds that this was a power not explicitly taken away, which is the structure the federal courts have followed in interpreting a tribe's powers.

Tribal governments do not raise revenue through taxation. Most tribal operating funds are distributed to the tribal government by the Bureau of Indian Affairs. "Tribal governments became surrogates for the federal government during the sixties, and this trend extended into the seventies..." (Deloria, V. & Lytle, 1984, p. 197). The amount of funds varies with the priorities and political situation in Washington, D C. Tribes also receive funds from leasing tribal lands, from tribal enterprises, from treaty settlements, and from other federal agencies through grants and contracts.

Lopach, Brown and Clow (1990) say that there are common themes found in reservation politics in Montana. These themes include a closely held belief in personal autonomy, loyalty to the familiar and near, political involvement for personal gain, belief that reservation government should be loosely structured and operated with vaguely defined procedures, and an extremely conservative outlook which cherishes the past and is tied to age and bloodline (pp. 178-180).

Tribal colleges were chartered by tribal governments which in most cases appoint the governing boards. Tribal governments and their constituents do not like to relinquish direct control of organizations they have chartered. But, accreditation requires that direct involvement and control by the chartering institution be relinquished. There is in this situation the potential for conflict.

Strand 4, Accreditation

"Accreditation has been awarded to 16 of the 24 colleges and the rest are accreditation candidates" (Lewis, 1994, p. 39). Accreditation gives legitimacy to the colleges. Young, Chamber, and Kells (1983) describe accreditation as a voluntary, non-governmental process of self-regulation focused on evaluation and improving educational quality (p. 10). Chernay (1990) adds that accreditation is also a communal activity (p. 3). For the tribal colleges and other higher education institutions, the voluntary nature of accreditation has been diminished with accreditation being linked to federal eligibility for

funds including the Tribally Controlled Community College Assistance Act. Virtually all colleges face similar pressures for federal aided students can only attend accredited schools. Accreditation was not seen by tribal colleges as a means of self-regulating. Tribal colleges did not have input into the development of the standards and eligibility requirements, and therefore felt that these were being imposed from the outside. Finally, the measures used to evaluate and improve educational quality lean towards things that can be quantified: the number of books in the library; the physical plant, materials and equipment; and faculty degrees. Tribal colleges are weak in these areas. The areas that they are strong in are not as valued in the accreditation process. The colleges are strong in the area of staff and community commitment to the mission of the college. The colleges are also strong in the area of providing a supportive and culturally sensitive environment. Neither one of these activities fulfills a standard or meets an eligibility requirement established by the accrediting associations.

Tribal colleges must deal with different accrediting associations. Since they rely on each other heavily for technical support, it becomes difficult to share expertise across regional accreditation boundary lines. The process is very similar in each region but just different enough that the colleges in different associations have some difficulty in sharing information usefully.

In 1974, before the Tribally Controlled Community College Assistance Act was passed, one of the common characteristics of the colleges as a group

was that almost all operated under bi-lateral agreements with other institutions (Wicks & Price, 1981). "Working together, however, frequently proved difficult for both parties; geographical, cultural and institutional differences provided ample opportunities for misunderstanding, stress, and disagreements" (Houser, 1991, p. 4). This resulted in some of the colleges recognizing that accreditation gave them their autonomy.

The colleges are very sensitive to the criticism that they are "commodity" colleges (Belgarde, 1994, p. 9). On the reservations, when they were established, residents received their food rations at the agency from the U. S. Army. Later the rations came to be known as commodities when the BIA began to distribute surplus foods. The commodities arrived in awkward sizes like five pound chunks of butter or ten pounds of processed cheese. Other times, people did not know how to use the food such as bulgar, powdered eggs or canned chickens. Commodities symbolize reservation residents' experience with insensitive government programs. Absolute necessities are given away in unusable sizes or are of unknown substances. Tribal colleges needed to establish that they were not "commodity" colleges giving away unusable credits. With accreditation, the colleges became legitimate institutions of higher learning. This was important in dispelling the notion that the colleges were second rate and gave away credits.

In the early years, accreditation was seen as intrusive, prompting the American Indian Higher Education Consortium to have as its first priority

the establishment of an Indian accrediting body. Since that time, opinions have changed. In a survey of fifteen tribal colleges in Montana, it was found that the college personnel were satisfied with the accreditation bodies and thought the experience was positive (McDonald, 1982).

Bad Wound (1990) observed:

The strong influence of accrediting agencies is seen in virtually every aspect of institutional life, from organizational structure, leadership behavior and decision making, to the curriculum, teaching, and learning. Institutional participants seem to operate under the assumption that they must conform to recommendations of accrediting agencies. In doing so, they become passive participants in a process that determines to a great extent the nature of institutional life (p. 17).

Accreditation also creates a problem with traditional knowledge and how to integrate it into the academic system that qualifies people by their degrees. The best illustration of this involves native language speakers. Native language speakers tend to come from the least "formally" educated group on the reservation. On the reservation, there are pockets of very traditional people. They live away from the agency area where running water and electricity are not always available. Their children go to school only

when forced. For this group, the language and the customs have been preserved and passed on (Clifford, 1974, p. 12). They are the best language teachers, because they not only speak the language but they model the cultural values of the tribe. As a group, many are among the poorest and the least acculturated on the reservation. They may not look, act, or even smell like "professors" should. During accreditation visits, this group of teachers fares very poorly. Their manners are different. The accreditation committee may only see their work-worn hands and that they smell of wood smoke and their lack of academic credentials as teachers.

The dilemma is also played out in administrative terms, especially in the way in which courses of study are put together. If there is too much emphasis on Indian courses or content, then courses don't fit the standard curriculum and the college will be deemed deficient in this area. If Native language and culture courses are offered as non-credit courses, then the college and the students cannot receive credit and funding for their efforts. G. One Feather (1974) said "special attention should be given to Indians who speak English as a second language and who live in the traditional tribal way. These experiences should become the basis of an accreditation process on Indian reservations because they form a basis of valuable knowledge that might otherwise have to be gained in a classroom or workshop" (p. 67).

Accreditation-the process

Of the twenty-four tribal colleges, eight are in the Northwest Association of Schools and Colleges (NASC) For any college in NASC to become accredited, it must move through a process that can be divided into five stages. The five stages are: Stage 1, Application for Consideration for Candidacy; Stage 2, Application for Candidacy; Stage 3, Candidate for Accreditation; Stage 4, Initial Accreditation; and Stage 5, Continuing Accreditation. The stages are not of equal length. Each stage has a set of required activities that all colleges must successfully accomplish. Only one stage has a strict time line, Stage 3, where the college must gain initial accreditation within five years or lose this status. Colleges stay in the fifth and final stage for as long as they exist as accredited institutions, but have to be reviewed periodically.

Accreditation is a process of self-evaluations, site-visits and actions by the Northwest Association of Schools and Colleges, Commission on Colleges (Commission). Self-evaluations or self-studies begin the process. Next, site-visits are conducted by administrators from other colleges and universities in the Northwest Association's region to verify the self-evaluation studies. Finally, official Commission actions are taken based on the self-evaluation studies and recommendations from site-visit committees. Self-evaluation is required in all stages of the process. The evaluations have different names and often require different levels of data collection and analysis. Gaining and

retaining the status of accredited institution is the outcome of the process.

Being an accredited institution brings with it three major benefits.

First, as an accredited institution, a college can offer courses for credits that are accepted by other institutions. This is very important to students wishing to transfer between institutions. Accredited status is the first measure of quality. Secondly, accredited status opens the door to the institution becoming eligible for federal funds. With the federal government providing student loan programs, Pell Grants and student work study funds, an institution of higher education finds accredited status a must for attracting students who need federal support. Finally, accredited status brings with it acceptance by the other members of the accrediting association that the new member looks and acts like the other members. By being accredited, the institution publicly proclaims that it is an accepted institution of higher education, organized and acting in a manner that is similar to and meets the standards of the other member institutions. Accreditation gives a college credibility.

Self-studies and site visits

Institutional self-studies are prescribed, formal, intensive written evaluations of the entire institution conducted by the institution itself. A self-study is a "comprehensive effort to measure progress according to previously accepted objectives" (Chernay, 1990, p. 5). A self-study is conducted by an institution to evaluate its compliance with the standards

established by the Commission (see Appendix B for a listing of relevant standards). A college or university is expected, section by section, department by department, to look at itself and determine if it is meeting the standards. A full-scale self evaluation often takes a full year to complete. The self-study is not to be the administrators evaluating the institution, but a process whereby each area evaluates itself. Institutional self-studies are found in Stages 2, 3, 4 and 5. The purpose of the institutional self-studies in Stages 2, 3 and 4 is to provide the basis for determining, along with the site-visit, if the applying institution is ready to move to the next stage. In Stage 5, the purpose of the institutional self-study is to document continued maintenance of standards and growth towards improvement. Self-studies may be called biennial reports, third year interim reports, fifth year interim reports or focused interim reports.

Site visits are the most visible activity in the accreditation process, especially in small institutions where almost everyone is interviewed or observed. Site visits are conducted by evaluators selected from member institutions, as similar to the one being visited as possible. The evaluators are chosen from a pool of people who have expressed an interest in being evaluators and have been through the Commission's evaluator training session. Evaluators are chosen by the Commission for specific site visits. An effort is made to "match" evaluators to sites, so that, for example, evaluators who work in community colleges usually visit other community colleges.

Each self-study becomes the basis and the focus of the site visit. The job of the evaluator is to verify, to their own comfort level, that the self-study reflects accurately the situation at the host institution. Evaluators are expected to notice and comment on anything else that the institution may be doing correctly or incorrectly, even if this activity is not mentioned in the self-study.

The essential eligibility requirements are, for the Northwest Association of Schools and Colleges (NASC), twenty-two statements that define institutions of higher learning. The requirements include the need for formal authority to operate, i.e. a charter; a governing board and a high degree of intellectual independence from founding and sustaining organizations.

Standards define in principle areas what an accredited institution of higher education must attend to. Standard 6. A and Standard 6. B describe governance and administration (see Appendix B). Standards have been developed over the years by representatives of member institutions. Kroener (1971) sees standards as simply "received wisdom of the day" (p. 66). The standards define not only what an institution of higher education is but also what a quality institution must address. The standards do not emphasize uniform outcomes, but instead emphasize the components, especially the tangible components that the Commission members have come to believe are essential for creating an effective institution where higher education occurs.

Site visits based on biennial reports, third and fifth year interim reports and focused interim reports are conducted by a "small committee". For tribal colleges, a small committee may be two or three evaluators and one NASC staff person. The small committee spends about a day and a half conducting the site visit. The committee must examine the colleges in all eleven eligibility requirements and twenty two standards, thereby making each member responsible for evaluating multiple areas. These visits focus on changes or particular issues around a deficiency identified in the last evaluation or self-study. A full-scale evaluation team at tribal colleges generally will have four evaluators accompanied by a staff person. This larger committee will spend approximately two and a half days conducting the visit.

Once the site visit has occurred, and prior to the team leaving this institution, the committee gives a preliminary report to the institution. After the visit, the committee writes a full report with recommendations that are sent to the staff at the Commission on Colleges. At the next meeting of the Commission, made up of twenty-three members, plus a chair and executive director who are ex officio members, all actions are voted on. Commission members come from the different types of institutions and the general public. This creates a calendar where most site visits occur in October and April with Commission actions taken in December and June.

The accreditation stages

In Stage 1, Application for Consideration for Candidacy, the applying institution is formally asking to begin the process. The applying institution declares that it meets the minimum definition of an institution of higher education and that it wants to become part of the association of accredited institutions. In Stage 1, the process involves a relatively simple written request, describing how the applying institution meets the Association's essential eligibility requirements. The applying institution evaluates itself against these stated criteria. If the Commission accepts that the applying institution meets most of the eligibility requirements, the applying institution is given permission to start the process of applying for candidacy.

In Stage 2, Application for Candidacy, the applying institution makes the claim, through a self-study and confirmed through a site visit, that it meets or can meet all eleven accreditation standards in the next five years. The self-study conducted by an institution as it is applying for candidacy is called an institutional self-study and mirrors the other institutional self-studies that will be conducted in the future, but is not expected to be as complete and sophisticated, as this is the first time the institution will have conducted one. A small evaluation team conducts this site visit.

If the applying institution is granted Candidacy status, it moves to Stage 3, Candidate for Accreditation. At this point its credits become transferable to other institutions. Candidates are eligible for federal funds just as if the

institution were fully accredited. The institution's name is added to the published and public list of accredited institutions. There are no set time limits for movement through Stages 1 and 2, though institutions are expected to move quickly through these stages as they are preliminary to becoming a candidate.

While in Stage 3, the applying institution must continually document maintenance of the standards it has met and progress towards meeting those standards in which it is deficient. The documentation comes in the form of biennial reports written by the institution with small site visits. These reports are brief self-evaluations that emphasize what has changed since the last institutional self-study. Institutions must successfully complete at least one biennial report and site visit cycle before it can be given permission to start another institutional self-study and prepare to host a full scale site-visit. Candidate institutions usually stay in Stage 3 for five years. However, if the institution meets all standards earlier, it may move on to Stage 4 in less than five years. The Commission determines the rate of progress on a case by case basis. An institution may not begin a full-scale self-study without the Commission's permission. If an institution does not meet the standards in five years, it must drop out of the process, and must wait two years before it can begin again at Stage 1 or Stage 2, depending on the situation and the decision of the Commission.

In Stage 4, Initial Accreditation, the candidate institution is now fully accredited, but is in a probationary status. The institution must submit a progress report after three years, documenting its continued maintenance of the standards and progress towards improvement. There is a small site visit. After five years, the institution in Stage 4 must conduct an institutional full-scale self-study and again host a full scale site visit.

In Stage 5, Continuing Accreditation, the institution reaches a point where formal, required, contact with the Commission is less frequent. Five years after moving into this stage, the college or university must submit an interim report and host a small team visit. Here the emphasis is on continuous improvement. Every ten years thereafter, the institution must conduct an institutional self-study and host a full-scale site visit. This process is repeated-five year interim report and small visit; 10 year institutional self-study and full-scale visit.

Every year all institutions, at the candidate level and beyond, must submit an annual report. The Commission asks members to report on enrollment; faculty size; budget; changes in programs; hiring a new president; and changes in the charter, and by-laws. This information is compiled and reported to the Commissioners during the spring meeting. It is also used by the staff as an indicator of changes that may need to be looked at in depth. Drops in budget; declines or jumps in enrollment; frequent turnover in presidents; new programs; changes in the number of faculty; changes in the

ratio of part-time to full-time faculty; and changes in the charter or bylaws of the college may trigger a closer look at the institution. The Commission believes these factors are indicators that an institution may be moving out of compliance with the eligibility requirements and/or the standards.

There are a series of actions that the Commission on Colleges can take to indicate that an institution is out of compliance or is experiencing difficulties. The most common action, and one that represents a concern of the Commission but not something big enough to put the college in deep trouble, is requiring a focused interim report and visit. Often a focused interim report is requested as part of another action taken by the Commission. For example, a tribal college may be granted initial accreditation status, with the condition that a focused interim report be submitted and a small site visit be hosted to address a particular problem that is significant but not significant enough to deny initial accreditation. Focused interim reports are also requested when the Commission rules that substantive program changes have been made. Program changes are to be reported, and the Commission decides if the change is "not substantive" and needs no extra action by the Commission, or is "substantive" and needs further, in-depth information.

The Commission may also issue show cause orders. This action requires the member institution to explain why it should not be placed on public probation and/or have its accreditation withdrawn. This is a relatively

rare occurrence. Show cause orders are issued only when a major problem has come to the attention of the Commission. A show-cause is a non-publicized, though public, probationary status that includes a specific date when candidacy or accreditation will be withdrawn if certain conditions are not met. The Commission is basically demanding information in issuing a show-cause order. The Commission is also putting the institution on notice that there is the possibility that there is a major problem. The institution is required to promptly address the Commission's concerns. If the Commission is not satisfied, it may conduct its own fact-finding investigation.

Placing an institution on probation means that there is a major problem, that puts the institution out of compliance with the standards. The member institution is expected to correct the deficiency immediately. The Commission publicly announces whenever a college or university is placed on probation. If the problem is not resolved, the institution will lose its accredited status. If a college or university has its accreditation withdrawn, it may not apply for reaccreditation for two years. Probation and withdrawal of accreditation are very rare occurrences.

Accreditation operates on two levels and this contributes to the difficulty in understanding the process and the outcomes. On one level, accreditation is a historically derived process that has created a definition of minimum quality in institutions of higher education. Using a process of self-evaluation and peer review through site visits, institutions are judged on

how closely they come to meeting the definition (the standards) and how they can be improved. By meeting the standards, the applying institution is accredited and joins the ranks of other institutions that have also met the definition. As part of the group, the new institution is now able to help develop new standards and work towards improvement. This aspect of accreditation is steeped in a long tradition of collegiality and self improvement, even though the first definition came from the Board of Trustees of the Carnegie Foundation for the Advancement of Teaching as a way of distinguishing secondary schools from higher education institutions (Shaw, 1993, p. 333).

Accreditation has come to operate on a second level, that of gate keeper to federal funds. In this role, the accrediting association is charged with identifying deficiencies and examining institutions for minimum standards. Wolf (1993) states the problem: "peer review and consultation are not the same as self-regulation" (p. 23). Self-regulation involves an emphasis on guaranteeing quality that accreditation as it is practiced now does not assure.

Accreditation Eligibility Requirements 1, 2 and 3 and Standards VII state that a college governing board that meets the requirements of accreditation will have a minimum of five board members who have no contractual, employment, or personal financial interest in the institution. This board should have a clear idea of its general duties and responsibilities. The institution must also have a charter and maintain an atmosphere in

which intellectual freedom and independence exist. The tribal government as the organization that charters the tribal colleges creates the board and outlines the relationship between the college and the tribal government. The tribal governments generally prefer to transfer as little authority and power as possible. How they transfer authority and how much authority to transfer become the issues of conflict and the focus of this study.

Chapter 3 Conceptual Framework, Research Questions, Methodology and Significance

Conceptual Framework

In an open-systems model, an organization is seen as an organized whole, not only influenced by environments but also dependent on them and possibly creating them (March, 1981). "Organizations are creatures of their distinctive times and places, reflecting not only the technical know-how but also the cultural rules and social beliefs in their environments" (Scott, 1995, p. 131). Tribal colleges are organizations that were and continue to be shaped by the times and the place where they are located. The tribal colleges in this study were patterned after a community college model in their basic organizational structure. But, the fact the colleges are located on Indian reservations makes their environment unique.

The tribal college environments of the colleges in this study are embedded in the larger reservation environment where they are located. The reservation population is undereducated. Only 46 percent of adult Indians over age 25 have completed a high school education (Levitan & Miller, 1993, p. 2). Reservations are for the most part rural, isolated areas where less than half of the Indian population lives. Reservations are poor. In 1974, when the colleges in this study first began to seek accreditation, it was reported that 63 percent of the Indian households had an annual income below \$3,000. (One Feather, V., 1974, p. 40). Based on the Bureau of Indian Affairs (BIA) count, in

January 1991 the average unemployment rate on the 30 reservations with a population of 3,000 or greater was 46 percent. Unemployment rates on six of the 10 largest reservations ranged from 60 to 86 percent (Levitan & Miller, 1993, p. 16). Half of the reservation residents lived in poverty (p. 2). There is no tax revenue to support education. Reservations are dominated by the federal government politically and economically, making the reservations, their people and organizations susceptible to the latest political fad and funding policy. Reservations are also composed of various tribal factions that spread themselves along a continuum from no-change traditionalists to full-steam-ahead social engineers.

“Organizations are systems of interdependent activities linking shifting coalitions of participants; the systems are embedded in--dependent on continuing exchanges with and constituted by the environments in which they operate” (Scott, 1994, p. 25). In the case of tribal colleges, important components of these coalitions are the students, the employees, and board members of the colleges. Also included in this group are the Indian community members, tribal council members and various people officially associated with the federal agencies and churches. The personalities in this final group shift frequently, as do the policies they are expected to advocate. This group of people associated with federal agencies and churches often has Indian members who may or may not be from the reservation at which they are stationed. A final component of the coalitions are the non-Indian

reservation residents who are not officially associated with a federal agency or a church. This group includes spouses of agency and church personnel as well as long term residents of the reservation. They are not eligible to participate in the political life of the reservation, but they are often found in other groups such as students and employees of the college.

The reservation is the tribal college's immediate external environment. Its larger environment is made up of the other people and organizations with which the tribal colleges interact. These organizations include, but are not limited to, all other tribal colleges, federal agencies not located on the reservation, accrediting associations, other institutions of higher education, organizations it purchases services from, the states in which the colleges are located, and various professional associations.

Accreditation is identified by Hoy and Miskel (1996, p. 204) as an important environmental force in schools. Tribal college presidents placed accreditation, their problems and the possible need to create a separate accrediting association, as their number one priority in 1979 (One Feather, G., 1974, p. 73). Pfeffer and Salancik (1978), when discussing organizations attempting to control other organizations, mention accrediting agencies first (p. 39). There is agreement that the accreditation process influenced the development of the colleges (Badwound, 1990; Belgarde, 1993; Oppelt, 1990; Stein, 1992; Wright, 1991). An accrediting association, such as the Northwest Association of Schools and Colleges, is interested in colleges' institutional

autonomy and academic freedom being protected by the manner in which the board of trustees are able to act independent of outside pressure.

Koerner (1971) says "academic freedom, now being stretched beyond any reasonable definition, is another practice in which the regional associations simply echo the sentiments of their more powerful members and impose this 'standard' on all other institutions" (p. 67). The Carnegie Commission on Higher Education in 1973 noted that autonomy is always limited by law, and the necessary controls that go along with financial support and public policy, yet for institutions relative independence is a great source of strength (as cited in Nason, 1980). This is seen as an essential eligibility requirement and a standard for accreditation. The effects this concern had on the tribal colleges, in this study, can be found in the colleges' applications, self-study, supporting documents and the official recommendations of the Commission; because these materials document the changes that occurred at each stage of accreditation. As the colleges faced the need to become accredited for funding and for further legitimacy needs, they were faced with having to change governing board structures to be acceptable to the accrediting association. Often these changes were incompatible with the tribal government's ways of doing things.

The tribal colleges, by receiving charters from tribal governments, created a relationship with those governments. Initially, the relationship was simple and familiar. The founders of the colleges and the members of the

tribal governments were familiar with the manner in which business is conducted on the reservation. The governing boards were generally constructed following the pattern in place in the tribal governments. The tribal council appointed trustees to short terms that were not staggered. Also tribal council members were appointed to the governing boards. Members of the tribal governments and the founders of the tribal colleges did not realize that these organizational arrangements would put them in conflict with accreditation standards. This is a uniquely complex setting to explore the question: What was the effect of the accreditation process on the organizational structure of governing boards and their relations with tribal governments at eight developing tribal colleges as the colleges sought accreditation?

Research Questions

From a historical perspective, focusing on the years 1974 through 1997, and relying on the documents archived at the Northwest Association of Schools and Colleges, Commission on Colleges (Commission), the following research questions were asked:

What was the effect of accreditation on the board of trustees role at the eight tribal colleges in the Northwest region?

1. How did the tribal colleges describe the trustee function, when application for initial candidacy was made? How were the

members chosen? How many were chosen? How long were they to serve?

2. What did the NASC, through its review of written documents, self studies and site visits, perceive as deficiencies (if any) or commendations (if any) in the area of trusteeship at the eight tribal colleges?

3. If there were deficiencies in the trustee function, did these deficiencies involve relationships between the college and other external constituencies, especially the tribal council? Is there evidence that the colleges used the requirements of accreditation to alter their relationship with the tribal councils?

Methodology

Approaching the topic as a historical document review of the years during which the tribal colleges applied for and were granted full accreditation allowed the researcher to track a set of formal interactions between the Commission and the tribal colleges concerning governing boards. Special emphasis was paid to the colleges' relationship to the tribal councils that chartered them.

The research utilized a historical document review methodology. By using this methodology, the researcher was able to look at specific interactions that occurred between the accrediting agency and the tribal college over a period of years. By looking at a few specific interactions over time, the

interactive process that occurred between organizations as they sought to influence and responded to each others' influence attempts became clear. When the process was looked at over time and the focus was limited, the effects of one organization on another was seen. Extensive interviews did not occur. The focus of this research was not on people's impressions but rather on an analysis of a specific set of documented interactions that occurred during a set time period with respect to accreditation. The researcher looked at what had been committed to paper, and thereby deemed important enough at the time to be included in the written documentation. This technique is a way of limiting and focusing the research in order to look at a specific set of historical interactions through an organizational theory lens (Meyer, 1978).

Documents written at the time of the events studied are the preferred source of information in historical research. Often interviews are conducted because the private and official papers from the period have not been made available to the researcher (Seldon, 1988). Interviews concerning historical events are particularly useful in developing the atmosphere that surrounded the events and in understanding the personal nuances and personalities of the actors/principals involved. Interviews also fill in the gaps in the documentation. Some influence efforts won't be picked up in official documents. An example is the informal sharing of information and expertise concerning accreditation that occurred between the colleges and is not documented in the official files.

There are serious limitations involved in conducting interviews concerning historical events, beginning with the interviewees' own forgetfulness and tendency to construct explanations. Things that happened in the distant past are often not remembered while more recent memories are more detailed but random and hard to make sense of. Respondents may construct self-serving explanations or "remember" selectively. There is the difficulty of finding and interviewing a representative sample in this particular research (Seldon, 1988). This is a special problem because many of the potential interviewees live in isolated areas with poor phone service. Complete and accurate lists of former board members for the various colleges are also almost impossible to find. Also, with short terms of office in the early years, each board member participated in a very small part of the interactions under study.

The researcher studied the interactions between the accreditation association representatives and the tribal college representatives especially as they concerned the governing boards and the tribal governments. The association representatives were mostly non-Indian and the Tribal college representatives were mostly Indian. From preliminary contacts with organizational representatives, the researcher found a reluctance to discuss the way the organizations acted on each other, thereby limiting the usefulness of interviews. Extensive interviews were not conducted in this research. It is recognized that this presents a limitation on the study, but one that the

researcher feels is compensated for by the quality of the information contained in the documents.

The interactions studied are formal—in that they are written down and in some cases represent the official position of the Commission. The documents and the information studied represented the interactive process that occurred as organizations sought to influence each other. How organizations interact with other organizations is difficult to study because records are generally not kept. In this case, because of the unique nature of the accreditation association with its need to document historical processes to do its work, a set of documents exists that detail the interactions that took place. The documents chosen for study represent a two way conversation, albeit formal and concerning a limited number of topics. But, the formality and limited nature of the conversation made it ideal to study, because the eight colleges in this study were all engaged in similar interactions, thereby allowing the researcher to examine what effect the accreditation process exerted in situations involving similar institutions. The fact that there were eight colleges in the study meant that approximately one-third of the tribal colleges that exist were studied under conditions that are relatively standardized.

Data gathering strategy

When doing historical research, the emphasis is on the collection of data to describe, explain and thereby understand actions or events that

occurred in the past, to make people aware of what happened and sometimes to assist in making predictions concerning future actions (Fraenkel, & Wallen, 1993, p. 432). For this study, the source of data was the documents stored at the Northwest Association of Schools and Colleges, Commission on Colleges.

The documents included a set of accreditation materials and supporting documentation that was submitted by each of the eight tribal colleges located in the Commission's geographical region. Seven of the tribal colleges are located in Montana: Blackfeet Community College; Dull Knife Memorial College; Fort Belknap College; Fort Peck Community College; Little Big Horn Community College; Salish Kootenai College; and Stone Child Community College. The eighth tribal college, Northwest Indian College, is located in Washington. The materials were submitted as the colleges moved through the various stages of accreditation. The documents are complete and standardized because they were submitted to fulfill Commission requirements. The documents have been stored and maintained because they are the evidence the Commission uses to support its actions. The documents described the condition of the colleges at each level of accreditation.

Another set of documents examined is Commission generated publications such as the Accreditation Handbook and materials used at self-study and site team training sessions. These documents represent the official

standards and requirements, and were the source of information concerning the official position of the Commission.

The third set of documents studied were the “working files” of the Commission. The “working files” began with a summary of the official interactions between the colleges and the Commission. The documents generated in these official actions as well as letters and documents submitted by the colleges to the Association in response to the Commissions’ actions were part of these files. Also included in this set were notes made by staff members concerning interactions and miscellaneous news clippings concerning the college. Letters from concerned citizens were also filed here. This set of documents represents the record of formal or official communications between the college and the Commission.

These various types of documents represent a complete record of the formal communications that occurred during the accreditation of the tribal colleges. Information from the original documents was gathered on a form created for that purpose. Information on the data form included the date the data was gathered and a document identification number. The date the document was created, by whom and for what purpose was also part of the information collected on the data gathering form. Documents that related to self- studies, Commission concerns (found in evaluation reports and correspondence), tribal government responses, and “Big Events” documents were selected and became part of the study. Data on charters, Articles of

Incorporation, by-laws and tribal resolutions were also gathered and studied (see Appendix C for a copy of the data gathering form).

Significance

As tribal colleges continue to grow and develop, the relationship between the colleges and the tribal councils has the potential to become more problematic. As the tribal councils seek and are given more control through the Indian Self Determination Act of 1975, the issue of control of the colleges is likely to reemerge. The Self Determination Act, the implementation of which was delayed for a number of years, set in motion a process that allows the gradual assumption of control of federal programs by tribal councils. Each tribal group determines when it is ready to begin the process and then is accepted by the BIA into the process. Only a few tribes are admitted each year. The tribes and the federal government then negotiate to determine what programs will be taken over by the tribe.

Higher education funding from the Tribally Controlled College Assistance Act has been exempt from consideration for self determination status. This might change as the tribal councils become more adept at managing their affairs and seek to bring all federal money that comes to a reservation through their offices. Tribal college funding might eventually come from the federal government to the tribe, and then to the college, instead of directly to the tribal colleges as it does now. The tribal colleges would

This research also provides a useful analysis of the pressures that created the governance arrangements between the tribal governments and the tribal colleges that exist today. Understanding how these organizations interacted may help direct the new decisions made by the colleges and the tribal councils. Tribal college representatives will be able to use this research to understand how they arrived at the trustee structure under which they currently operate, so that they can place current trustee issues in a sound historical perspective.

This research would also provide a careful exploration of how organizations influence one another and the organizational responses to these pressures. The fact that organizations influence one another is widely accepted and studied in organizational research. This research will add to the body of knowledge concerning influence interactions that have gone on between an accrediting agency and a set of tribal colleges, and how this influenced the development of an organizational structure, something that has not been studied before.

Chapter 4 Results

Demographics of Tribal Colleges

There are eight tribal colleges in this study. Seven are located in Montana and one in Washington state. All of the colleges are located on Indian reservations. They represent all the tribal colleges located in the states that are part of the Northwest Association of Schools and Colleges.

The colleges range in size from 760 Full Time Equivalent (FTE) students to 208 FTE students, making even the largest of these colleges a small institution (see Appendix A). The majority of the students are Indian, but because of the intricacies of determining the Indian Student Count (ISC), the ISC is not entirely representative of the number of Indian students attending the colleges. The annual budgets range from a high of \$12,778,818 to a low of \$1,739,741 (see Appendix A).

The first college was chartered in 1973; the most recent in 1984. Many of the colleges did not operate as independent institutions as soon as they were chartered. In order to meet the eligibility requirements when applying for accreditation as an applicant for consideration for candidacy, an institution must have been in operation for at least a year. This makes the year of application for consideration as a candidate a benchmark for establishing when the colleges were more than extensions of other institutions. Four tribal colleges in this study applied for Candidacy Consideration in 1979 (see Chart 1 below). One each applied for Candidacy Consideration in 1980 and

1981. Two colleges applied in 1986 and one in 1987. Three colleges applied for Candidacy Consideration twice. The Commission felt at the time of their first applications that they did not meet all the eligibility requirements.

Chart 1, Year Chartered

	Year chartered	Year applied for candidacy consideration	Year granted initial accreditation
College 1	1975	1979 (June) 1st time 1989 2nd time	1996
College 2	1974	1979 (Aug.)	1985
College 3	1980	1979 (Sept.) 1st time 1983 2nd time	1990
College 4	1977	1979 (Dec.)	1984
College 5	1973	1980 1st time 1986 2nd time	1993
College 6	1978	1981	1991
College 7	1983	1986	1993
College 8	1984	1986	1993

For the first few years, four of the five colleges moved towards Initial Accreditation at about the same pace. College 3 was denied Consideration for Candidacy status and did not reapply for four years. Colleges 1 and 5 moved normally through the first stages, Application for Consideration for Candidacy and Application for Candidacy. College 1 was a Candidate for six years, but after the final full-scale visit, was denied Initial Accreditation. College 1 restarted the process in 1989. College 5 also did not receive Initial

Accreditation after moving through the first two stages quickly. College 5's Candidate for Accreditation status was discontinued in 1983. It reapplied for Consideration for Candidacy in 1986.

College 4 was the first to receive Initial Accreditation at the Associate of Arts level and at the Baccalaureate level (see Chart 2, for a composite view of the colleges' experience through Consideration for Candidacy and Candidacy for Accreditation Stage. The chart shows the year and the month an application was submitted and the year and month of the Commission's action concerning the application. Any request for additional reports is noted.) If there were governance problems, this is also noted. More of the colleges that made applications for Consideration for Candidacy in the early years moved to the Candidate for Accreditation stage without experiencing their applications not being accepted or decisions being deferred than those which applied later. One of first colleges to apply for accreditation has grown into the largest of the eight and another is the smallest. One of the first colleges to apply for accreditation accounts for half of the major sanctions (probation, show cause or discontinuing accreditation) issued to all tribal colleges (see Appendix E).

Chart 2, Accreditation Stages 1 and 2

College 1-1979	College 2-1979	College 3-1979	College 4-1979
<p>1979 May Application for consideration for candidacy submitted. 1979 June Application for consideration approved.</p>	<p>1979 Aug. Application for consideration for candidacy submitted, approved, and site-visit scheduled for October.</p>	<p>1979 Sept. Application for consideration for candidacy submitted. (Gov. board problem) Application denied ***** 1983 Oct. Application for consideration resubmitted. 1983 Dec. Application for candidacy accepted and go ahead given to proceed with self-study and preparations for site visit.</p>	<p>1979 Dec. Application for consideration 1980 Feb. Application for consideration accepted. Okay to proceed with self-study and host site visit.</p>
<p>1979 Oct. Site visit based on self-study. (Gov. board problem) 1979 Dec. Approved as candidate for accreditation.</p>	<p>1979 Oct. Site visit based on self-study. 1979 Dec. Approved as candidate for accreditation</p>	<p>1984 Site visit based on self-study. 1984 June Approved as candidate for accreditation with condition—submit written description and confirmation of compliance re: the library.</p>	<p>1980 Fall Preliminary visit conducted 1980 Dec. Approved as candidate for accreditation.</p>

Chart 2, continued

College 5-1980	College-1881	College 7-1986	College 8-1987
1980 April Application for consideration for candidacy submitted. (Gov. board problem)	1981 Aug. Application for consideration for candidacy submitted. (Gov. board problem)	1986 March. Application for consideration submitted. (Gov. board problem)	1987 Oct. Application for consideration submitted
1980 June Action on application for candidate for accreditation deferred until December.	1982 June Not approved for consideration.	1986 June Application for consideration accepted.	1987 Dec. Application for consideration not accepted, concerns included separation from tribal council and powers to run college, eligibility requirements 2 & 3. (Gov. board problem)
1980 Fall Preliminary visit conducted.	Resubmits application for consideration for candidacy (needed to resubmit because so many years had passed) (Gov. board problem)	1986 Oct. Site visit based on self-study.	1988 Oct. Resubmitted application for consideration.
1980 Dec. Approved as candidate for accreditation.	1985 June Accepted for consideration with conditions of preliminary visit and report.	1986 Dec. Decision deferred on recognition as candidate. (Gov. Board problem)	1988 Dec. Application for consideration accepted and given okay to proceed with self-study and plan site visit.
*****	1985 Oct. Preliminary visit and report accepted. College encouraged to proceed with self study and host on-site visit.	1987 Approved as candidate for accreditation.	1989 April. Site visit based on self-study for candidate for accreditation.
1986 Spring Application for consideration submitted.	1986 April Site visit based on self-study for application for candidacy.		1989 June Approved as candidate for accreditation, with written progress report in spring 1990 concerning general education requirement and training for and assumption of administrative positions in student services area.
1986 June Application for consideration deferred--request for additional information	1986 June Granted initial candidacy.		
1986 Dec. Deferred action, requested preliminary visit.			
1987 June Application for consideration accepted. Okay given to proceed with self-study and site visit planning.			
1988 Site visit based on self-study.			
1988 June Approved as candidate for accreditation.			1990 Oct. Submits progress report. 1990 Dec. Progress report accepted

In the following summaries of the interactions that occurred at the eight tribal colleges in this study, the same information is presented in a different form in Appendices D through K. The data in the appendices are presented as interactions. The first interaction for each college begins with the application for Candidacy Consideration and continues until September 1998. Statements that are used in the narrative are also found where they occur in the interaction appendices.

Interactions are defined as a series of actions that are initiated by one of the three parties in the study—the tribal college, the tribal government or the Commission. The majority of the interactions are initiated by the colleges as they move through the accreditation process. Interactions may also include extraordinary communications such as focused interim reports, special progress or preliminary reports, or responses to show cause orders. These extraordinary actions are counted as a part of the interaction from which they originate.

Five interactions began with actions taken by the tribal governments that affected the governance structure of the tribal colleges. These interactions were given the name “Big Events” by the researcher. A “Big Event” is a series of interactions that involve all three major parties—the college, the tribal government and the accreditation association. “Big Events” involve issues that overlap into all parties’ areas of concern, thereby causing all parties to act and react to each other. All “Big Events” revolve around

accreditation issues and resulted in one probation and two show-cause orders being issued. The “Big Events” studied here all involve governance issues and were resolved by the tribal governments accommodating accreditation needs. “Big Events” includes summaries of information not found in the “interactions” or charter, articles of incorporation, by-laws and tribal resolutions” appendices. All information is presented as summaries to protect the privacy of the authors.

College 1

(Appendix D depicts this College’s accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix M displays the changes that have occurred in the charter and by-laws of College 1 over the years.)

College 1 was one of the first tribal colleges in this study to apply for Consideration for Candidacy in 1979. It was quickly approved for Consideration for Candidacy and for Candidacy status, Stages 1 and 2. The Commission voiced concerns during this period over the College’s finances and other non-governing board issues. After six years in candidate status, due to communication problems between the faculty and the administration, College 1 was denied Initial Accreditation. College officials felt a few college people “torpedoed” the site visit and that the evaluators were misled and deceived. The College was experiencing financial problems, with a substantial deficit reported, prior to not being granted Initial Accreditation.

A pattern has been established at College 1 where individuals often write to the Commission concerning College issues. This has been going on in the past and continues today. Examples of issues brought to the attention of the Commission included a faculty member being non-renewed for dubious reasons, specific board misbehavior, or general dissatisfaction with the College. The pattern of writing to the Commission to air complaints and threaten the College's accreditation has become ingrained. Writers have even suggested that the Commission "yank" accreditation. This pattern is not seen as dramatically at other colleges.

After starting the accreditation process over in 1989 and achieving Candidacy status in 1990, followed by Initial Accreditation in 1996, the college experienced a "Big Event". A "Big Event" is a series of interactions that involve all three major parties-the college, the tribal government and the accreditation association. "Big Events" involve issues that overlap into all parties' areas of concern, thereby causing all parties to act and react to each other. In this case, the tribal government moved to restructure tribal government and reinvigorate all tribal boards, Commissions and committees by uniformly imposing set term lengths and termination dates for members. The tribal government thought this move would make it easier for it to appoint members to all these groups at the same time. The Accreditation Commission saw the actions as violating the independence of the College because governing boards must be independent according to accreditation

standards; thereby placing the College's accredited status in jeopardy. The problem was eventually resolved when the College, supported by the Commission, asked the Tribal Council for and was granted an exemption from the restructuring. College 1 was granted Initial Accreditation in 1996 and has a third year progress report due in 1999.

College 2

(Appendix E depicts this College's accreditation experience. Statements from the College and the Commission displayed when they occurred in the process. Appendix N displays the changes that have occurred in the charter and by-laws of College 2 over the years.)

College 2 applied for Consideration for Candidacy in 1979. The College moved rather smoothly through the first four stages of the accreditation process. During Stage 5, Continuing Accreditation, College 2 experienced the most cataclysmic "Big Event" of the colleges in this study.

In 1985 and 1990 evaluation teams noted that the College has a dedicated and interested Board, but "this intense concern for the College must not move the Board into Administrative roles". In 1993 a struggle between the Board and the President of the College exploded with the relationship with the Tribal Council the flashpoint.

The conflict exploded in 1993 when the Tribal Council was notified by the College President that three of the Board members had been improperly appointed. They were improperly appointed because the Council's Education

Committee, which conducts a paper screening of potential Board members, did not bring all qualified applicants to the Council to be voted on. The Education Committee allowed the Tribal Council to believe that all qualified applicants were being presented. No Council member asked if all applicants were among those being presented. The Council then appointed the Board members, creating a shift in the balance of support for the President. The President received a negative job review from the Board and her contract was not extended. But, after the President informed the Tribal Council of the improprieties concerning the appointment of the College Board members, the Council dismissed the Board, and negated their actions, including the termination of the President.

A "Big Event" resulted when the Commission was apprised of the situation and a show-cause order was issued. The problem, to the Commission, was the removal of the three College Board members and the undoing of a series of actions the College governing board had taken. The Tribal Council insisted that the process that was used to appoint three College Board members was flawed. The Council said that it was used by a political opponent of the President to stack the Board with people who did not support the President. The Commission, on the basis of a fact finding visit, found that in this case the College Board had been improperly appointed by the Tribal Council and that the Council could remove the three Board members and

rescind the board actions without it being considered a violation of accreditation standards.

A few years later, this College was placed on probation because of concerns with its stability in governance. Some community members saw this as history repeating itself as the College Board, while trying to terminate the President, was once again removed by the Tribal Council. The situation in both cases was seen by some as a family-political problem where one family-political group was jockeying for position with another. The President of the College and the Tribal Council Chairperson are related. The President, in this case, informed the Council that many of the College Board members' terms had expired. The technical issue involved whether or not terms had expired. The President said their terms were up, the Board members said they were not. This all was happening as the College Board was attempting to remove the President. The Commission's concerns were with the College's need for complete and full autonomy to govern itself, and the stability and continuity of Board membership through staggered terms, which encourages retention of institutional memory. The Commission also felt that the College needed to establish a clear differentiation between the policy making function of the Board and executive responsibilities of those who carry out the policies. This was a recognition that the problem might be between the Board and the President as well as between the Board and the Council.

Probation was removed in 1997 after an intensive effort, mediated by the Commission, resulting in a new charter and by-laws being written. The College Board, the Commission, and the Tribal Council all accepted the new charter and by-laws. The College also reviewed and revised all policy and procedure documents and all parties accepted these as well. The Tribal Council also reviewed its resolutions. As a result of this review, the Tribal Council passed a new resolution stating its right to delegate powers and review actions of the College. The Tribal Council went on to say that it was formally expressing the intent for the Council and the College to have an autonomous relationship. The Tribal Government also stated that it would not interfere in any way whatsoever with the operations and activities of the College. As a result, College 2 retains continuing accreditation, with an institutional self-study and full-scale visit due in 2000.

College 3

(Appendix F depicts this College's accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix O displays the changes that have occurred in the charter and by-laws of College 3 over the years.)

College 3 applied for Consideration for Candidacy in 1983. The Commission worried that it was not clear if the College Board was truly a governing board, due to contradictory statements regarding its makeup. These statements involved the number of members on the governing and

how they were appointed. These problems, which stemmed from the informality of the initial governing board documents, were addressed with charter changes. The College wrote to the Commission: "The Tribal Council (a meeting of the entire adult tribe members) has ultimate authority over anything that occurs on the reservation. However the Council has rightfully granted unusual authority to the College and does not feel threatened in the least". Since this time, College 3 has moved through the accreditation process with few problems. The College has been led by a strong, long tenured president.

In 1993, there was an attempt by a member of tribal government to fire the president. This action caused a "Big Event". The Tribal constitution and by-laws allow any member to present resolutions to be voted on by the Council. The Council, on this reservation, consists of the entire tribal membership. The direct representation practiced by the tribe is an accurate continuation of its traditional governing system. A more moderate, alternative amendment was presented to address the same concerns by amending the way in which the governing board of the College would be chosen and calling for a review of the College's audits. The Commission wrote to the Council stating that: "If the Tribal council terminated an employee of the College, including the College President, it would clearly indicate that the Board of the College did not have sufficient authority to carry out its responsibility". The Council wrote back to the Commission

saying, "The Council feels that the College belongs to the people. It is with this in mind that the Council amends the election process of the Board. Such actions as taken by the Council are not to be construed to affect the authority of the governing board, nor the accreditation of the College."

The Council overwhelmingly defeated the first Tribal resolution-the one to remove the president. The second resolution passed and the changes were incorporated into the by-laws. The College finished Initial Accreditation, Stage 4, in 1995. The College is scheduled for its first Continuing Accreditation, fifth year interim visit in 2000.

College 4

(Appendix G depicts this College's accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix P displays the changes that have occurred in the charter and by-laws of College 4 over the years.)

College 4 applied for Consideration for Candidacy in 1979, and was approved two months later. It immediately began a self-study and planning for a site visit. It was approved as a Candidate for Accreditation in June 1980. It had taken only six months to move through Stages 1 & 2. The College moved through the Candidacy for Accreditation stage in four years. This College was the largest from early on and has continued to be the largest, most fully developed of the colleges in this set. College 4 has had the same

President since its inception. The College President is widely respected as a local, regional, and national leader in Indian education.

The College has experienced few governing board problems, and no noticeable tribal government interference, though the same basic structures that allow for it in other places are in place here. These structures include the provision that the tribal government has, at all times, power to prescribe such regulations, provisions and limitations as it may deem advisable. This College has worked very closely with two other colleges, and their charters and by-laws contain similar elements. A third college borrowed this section from College 4's charter. These four colleges all have the same provision, which at this point has not been the focus of any "Big Event". College 4 has completed its third-year interim report as part of its Continuing Accreditation Status. It is scheduled for a ten-year institutional self-study and full-scale visit in 2003.

College 5

(Appendix H depicts this College's accreditation experience. Statements from the College and Commission are displayed when they occurred in the process. Appendix Q displays the changes that have occurred in the charter and by-laws of College 5 over the years.)

College 5 initially applied for Consideration as a Candidate and Candidate status in 1980. It was accepted as a Candidate in that year. In 1983, its recognition as a Candidate for Accreditation was discontinued. It reapplied

in 1986. The reasons for discontinuing accreditation were not governing board issues, though those issues had been of concern to the Commission. It reapplied in 1986. The College almost closed after experiencing financial problems, operating under a contract with another college for a few years. Since then, it has undergone a metamorphosis, emerging as the second largest college in this study. The College has experienced sustained leadership since entering this second period, which began about the time the college once again asked to be considered for Candidacy.

During this second Application for Candidacy phase, a "Big Event" began as the Commission exerted sustained pressure on the College to remove "regulatory" provisions found in the Charter. Prior approval was necessary for the College to: borrow funds; enter into business contracts or litigation; utilize the professional advice of consultants or tribal lawyer retained by the Business Council; enter into separate contracts for professional service; or execute leases. The situation was resolved through the writing of thoughtful letters by the College President and the Commission which summarized events and positions in nonthreatening ways; wide dispersal of information concerning the issues, and direct negotiation between the College and the Tribal Government. Sections of the charter and by-laws were revised and all parties accepted them. The new charter included a section borrowed from College 4 that gives the Tribal Council the power to prescribe such regulations, provisions and limitations it may deem advisable.

In 1994, the Tribal Government sought to unify all tribal education programs under one Education Commission with uniform by-laws for all the educational groups. This action created a new set of by-laws that impinged on the independence of the College. The situation was again resolved through the comprehensive analysis of the situation by the President of the College; the solicitation of the Commission's opinion; the sharing of this information with the College Board and the Tribal Council in a positive and supportive manner and then negotiating directly with all parties. College 5 is currently in Stage 4 of the accreditation process, Initial Accreditation. The College will conduct a fifth-year self study and host a site visit in 1998.

College 6

(Appendix I depicts this College's accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix R displays the changes that have occurred in the charter and by-laws of College 6 over the years.)

College 6 applied for Consideration for Candidacy and Candidacy Status in 1981. The College seemed not to understand the process and applied for both Consideration and Candidacy Status at the same time. The College was not approved for either status. There were problems in all areas--finance, physical plant, library, educational program, instructional staff, student services and administration. Within the administration section, the concern was with "the duties and responsibilities of the Board of Directors and its

relationship to the Tribal Council. This needs to be set forth in an official policy statement". There were also serious concerns with the stability of the administration with respect to the president.

The College reapplied for Consideration for Candidacy in 1985. It was accepted for Consideration for Candidacy after a preliminary visit. There were concerns in the area of facilities, student record preparation and maintenance, staff funding, membership of the Board of Directors, and compliance with the requirement that voting members have no "contractual, employment, or personal financial interest in the college". The College responded saying it was felt by the administration and the Board that occasions might arise where the expertise of individual members of the board might be needed to perform a task for the College that was beyond the scope of their role as board member. In such situations, the Board felt that members should be fairly compensated for such services, if needed, through a contract arrangement. The major consideration for the change of this language was the use of Board members as part-time instructors in their particular areas of expertise. The charter language allowed the College to make use of expertise available locally that might not otherwise be available. There were many other charter revisions as the College worked to address the Commission's concerns.

During the next three stages, the College experienced few problems as it gained accreditation and continued to be accredited. Though the reservation

has experienced a severe cutback in jobs generated through three tribal-owned industries, the College has not experienced a "Big Event". College 6 is presently in Continuing Accreditation status; with a fifth-year self study and visit due in 2001.

College 7

(Appendix J depicts this College's accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix S displays the changes that have occurred in the charter and by-laws of College 7 over the years.)

College 7 made application for Consideration for Candidacy in March 1986. It was not apparent to the visiting team, nor stated clearly in the charter nor by-laws, if the College was in compliance with the requirement that Board members have no contractual, employment, or personal interest in the institution. This was not viewed as a major problem and the College was given permission to apply for Candidacy status in June, 1986. The College prepared a self-study and hosted a site visit in October, 1986.

In December, 1986, the decision to grant Candidacy status was deferred until June, 1987:

The concerns were with governance. Although the college and its governing board have no experience to the contrary and believe that the governing board has full authority and independence, the evaluation team is

unsure about the degree of independence should a challenging situation occur. A by-law specifically provides that the Chair of the Council has authority to review and approve all actions of the governing board of the College. Although no contrary experience has been noted, there exists the real possibility that this proviso for veto power by the Council Chairperson could be implemented. If so, then the College Board would not have final authority and its governing independence could be abrogated. As such, it is appropriate to question its full authority to govern the College and its ability to protect the College from undue political interference and pressures. The Commission encourages the two organizations to develop a written understanding, acceptable to both, that would ensure the authority of the College's governing board to carry out the mission of the institution (Commission to College 7, 1986, Appendix J).

The College wrote to the Commission that it was "disappointed, of course, that the Commission on Colleges apparently interprets part of the charter in the most literal sense. As an institution established under the Tribally Controlled Community College Act of 1978, we will always be subject to the jurisdiction and tribal sovereignty of the Council". The College was approved

as a Candidate for Accreditation in 1987. By 1989, at the time of the Biennial report, concerns were resolved when the College successfully persuaded the Tribal Council to approve a resolution in which the authority of the Council was repealed and actions of the College Board of Directors were established to be final.

In 1996, the Council passed a resolution that acted on the recommendations of a task force that had been established the year before. This education task force was one of thirteen separate committees given the mission of reviewing all tribal programs and enterprises to determine areas where "management can be restructured to provide more efficient and cost-effective services". The Tribal government wrote in a press release sent to the Commission: "This review of Tribal government activities was undertaken, as federal cutbacks have substantially impacted the Tribal government, and concerns abound with the people about the operation of the various programs." The Tribal government also stated the college had been successful in obtaining several grants and contracts "under the auspices of the Tribal government and the Council sought to have these grants and contracts "returned" to the Council for administration.

The resolution commented that there was limited cooperation from the College staff and administration "on structure, organization and accountability." The task force found that the "College is developing an inappropriate autonomy that is inconsistent with its status as a tribally

controlled community college. In light of all this, the task force recommended that the Council draft “organizational documents to ensure that the college is a tribally controlled and organized entity; recommend revisions to ensure the Council selection and appointment of Board members”, and do all this in a manner such that the college continues to comply with requirements of the Northwest Association of Schools and Colleges.

A series of letters was written among the Commission Director, the Council Chairman, the College President, and the College governing board. The College Board stated “We as a board know we have to remain autonomous from the Tribal Council. No one understands this better than the board. We fully support the College administration in their endeavors to make our institution grow in a progressive and professional manner”. The Commission acknowledged there was “some inclination to pull the Commission into the middle of the controversy between the College and the Council and that is was not “the business of the Commission on Colleges to make judgments about the authority of the Council”, but if the College is to be accredited it must be autonomous and the College and the Council should jointly prepare a prospectus outlining the proposed changes.

The Council argued its position from the perspective of the need to be in compliance with federal regulations with respect to “tribally controlled” community colleges, and as a sovereign authority with authority over the

College. The Tribal Council did not implement the task force's recommendations even though it continued to see its actions as stabilizing the situation. The Tribal Council believed it had never moved to interfere in the college. The issue died down. The long tenured president was subsequently fired over other issues and was replaced by a president who got fired in just over a year. During these years the College had three Presidents in quick succession.

The most recently fired President informed the Commission that the Board was interfering with her right to hire and fire staff. The Board, she said, had been hiring tribal members who were not qualified especially in light of the need for Masters level faculty. The leadership controversy continues to simmer at this time. The College has successfully completed its third year progress report as part of Stage 4, Initial Accreditation. The College will conduct an institutional self study and host a full-scale visit in 1998.

College 8

(Appendix K depicts this College's accreditation experience. Statements from the College and the Commission are displayed when they occurred in the process. Appendix T displays the changes that have occurred in the charter and by-laws of College 8 over the years.)

In October, 1987, College 8 applied for Consideration for Candidacy status; in December of that year it was denied. Consideration was denied because of concerns over governing board issues, intellectual freedom, and

other Eligibility Requirements. In light of this, in September, 1988, the Tribal Council passed a resolution that acknowledged that the College was an applicant for accreditation and needed to be in compliance with the requirements of the Commission. The Tribal Council acknowledged all actions of the College Board to be final in order to assure the degree of autonomy and independence required for accreditation. The next month the College reapplied for Consideration for Candidacy, was accepted and given permission to proceed with the self-study and planning for the site visit. The College said in its materials to the Commission:

The governance system at College 8 is unique in that there is representation from all areas of the college community: administration, faculty, students, and community. There is very little empire building because the concept which governs all decisions is always 'What is best for the students and the college?' The strength of its governance is the broad representation and student representation. The staff and faculty have brought qualities of leadership and experience in Native American education to the college. Although the governance system is as democratic as possible and results in decisions which have at least a majority

of supporters, it is slow and time consuming. At times, the burden of another meeting seems excessive. Nevertheless, the staff and faculty are quick to point out that it is preferable to the alternative of having decisions made without their input and sometimes lengthy deliberation.

There were a series of charter revisions during this period that amended the charter so that no Board member had "contractual, employment, or personal financial interest in the college". After this time, the College experienced few problems in the accreditation process for a number of years.

In 1992, 1995, and 1996 the College experienced a series of events that are correctly classified as a "Big Event". The Tribal Council moved to change the appointment statutes of the Directors to the College Board to two year, unstaggered terms. It also moved to subsequently appoint the Chair of the College Board of Directors to foster consistency among all tribal sub-committees. The Commission wrote a very mild letter stating its concerns with the Tribal Council's actions and the implications for the College's accreditation status. The College seemed to wrangle its way around the problem with resignations and reappointment of various Board members. College 8 is currently in Stage 4, Initial Accreditation, with its fifth-year study and site visit to be conducted in 1998.

Summary of interactions

Eighty-four formal interactions between the Colleges and the Commission were studied (see Chart 3, below). These interactions represent the ordinary, expected communications such as self-studies, biennial reports and other reports originating at the College, and the responses by the Commission to these communications. These interactions also include extraordinary communications such as focused interim reports, special progress or preliminary reports, and responses to warnings to correct deficiencies, when probation is imposed, when show-cause orders are issued or when accreditation is terminated. Extraordinary actions, in this study, most often involved focused interim reports, where the college responds in writing to specific concerns or problems identified by an evaluation committee site visit. Other possible extraordinary actions by the Commission involve issuing a warning to correct deficiencies, impose probation, issue show-cause or terminate accreditation. Probation was imposed once and two show-cause orders were issued to tribal colleges in this study. A single interaction may include more than one report or communication that was not accepted and then rewritten and accepted, or not accepted and the event escalated. Not included among the interactions were substantive change requests and responses because they did not deal with governance issues.

Twenty-five of the responses by the Commission to the eighty-four interactions involved governance issues, or about 30% of the events.

Governance issues involve Commission concerns about the charters, the governing boards, or intellectual freedom. Standard VII and Eligibility Requirements 1, 2, 3 and 4 are the basis for these concerns (see Appendix B for a complete listing). There were sixty-one ordinary interactions. Twenty ordinary interactions received responses from the Commission that involved governance issues. There were twenty-three extraordinary interactions of which five involved governance issues. The interactions that concerned governance issues occurred more often than if the concerns were evenly spread among all the standards and eligibility requirements.

The Commission issued three major sanctions. The sanctions were two show-cause orders and one probation order. College 2 received a show-cause order and probation order, and both concerned governance issues. College 5 received a show-cause order and had its accreditation discontinued. The College says it allowed the accreditation to lapse when it chose not to respond to the show-cause order. The issue did not involve governance concerns. Six colleges, College 1, 2, 3, 5, 7, and 8, have had tribal council interventions significant enough to be brought to the attention of the Commission. Five of these "Big Events" occurred after Initial Accreditation was granted. Only one incident resulted in formal sanctions being issued, and that was at College 2. All the other "Big Events" had the Commission stating its position in writing, at times directly to the Tribal Council and at other times to the College Boards or administration, which then forwarded the

Commission's letters to the Councils. In two of the six "Big Events" the Tribal Councils wrote directly to the Commission. These interactions produced changes acceptable to the Commission.

Chart 3 Interactions Summary

		Involved governance or administration issues
College 1	10 ordinary actions	1 ordinary actions
Total 13 interactions	3 extra-ordinary actions	0 extra-ordinary actions
College 2	8 ordinary actions	4 ordinary actions
Total 12 interactions	4 extra-ordinary actions	2 extra-ordinary actions
College 3	7 ordinary actions	1 ordinary actions
Total 11 interactions	4 extra-ordinary actions	0 extra-ordinary actions
College 4	7 ordinary actions	0 ordinary actions
Total 9 interactions	2 extra-ordinary actions	0 extra-ordinary actions
College 5	9 ordinary actions	7 ordinary actions
Total 13 interactions	4 extra-ordinary actions	2 extra-ordinary actions
College 6	8 ordinary actions	2 ordinary actions
Total 10 interactions	2 extra-ordinary actions	1 extra-ordinary actions
College 7	6 ordinary actions	4 ordinary actions
Total 7 interactions	1 extra-ordinary actions	0 extra-ordinary actions
College 8	6 ordinary actions	1 ordinary actions
Total 9 interactions	3 extra-ordinary actions	0 extra-ordinary actions
Total 84 interactions	Total 61 ordinary actions 23 extra-ordinary actions	Total 20 ordinary actions 5 extra-ordinary actions

Charters and Bylaws

Tribal governments participate in the accreditation process in three ways. The first is when a tribal government charters a college. A tribal college must be chartered by a tribe in order to be meet the requirements of the Tribally Controlled Community College Assistance Act. For accreditation purposes, a tribal college must have formal authority from the appropriate governmental agency to grant degrees, and the Commission has accepted

tribal charters as fulfilling this requirement. All tribal colleges in this study have received charters from the respective tribal governments of the reservation on which they are located. They are chartered as non-profit organizations established to provide postsecondary educational services to the reservation community.

Three of the tribes who chartered colleges in this study operate under non-Indian Reorganization Act (IRA) constitutions. The other five colleges are chartered by tribes that operate under IRA constitutions. Whether or not a tribal government is organized under the IRA is a way of discerning the political inclinations of the tribe. If a tribe resisted the incentives and pressures that the federal government placed on the tribe to accept the IRA, then one may presume that tribe was and might still be politically dominated by its more traditional members. Therefore, the tribes that operate under IRA constitutions can be categorized as being interested in economic development and creating jobs. But the traditional-split is no indication of how well a tribe operates. The IRA emphasized economic development and this continues to be the main concern of all tribal governments. Economics, especially jobs, becomes the filter through which most reservation issues are viewed and therefore also influence how tribal colleges are viewed by the tribal governments.

The second way a tribal government may become involved in the accreditation process is when the Commission expresses a concern about the

governance structures at a tribal college. There are three areas the Commission frequently identifies as concerns at tribal colleges: 1.) Compliance with the need for a governing board to have sufficient authority to carry out the college's mission; 2.) Compliance with the need for the college governing board to have sufficient autonomy from the chartering organization; 3.) The need for a clear differentiation between the policy-making function of the board and the executive responsibilities of those who carry out those functions, e.g., the President. In the same vein, the Commission is also concerned with the need for board members to have no contractual employment or personal financial interest in the college. This is a concern with the relationship of the governing board and the college rather than the college and the tribal government though tribal government politics are no doubt often a factor. These concerns arise from provisions in the charters and by-laws that define the working relationship between the college and the tribal government or the board and administration.

The Commission identifies the problem to the college. The college must then negotiate changes to the charter and/or the by-laws with the tribal government. These changes modify the relationship between the college and the tribal government. Most often at this point, before Initial Accreditation has been achieved, the tribal governments are more amicable to making changes and in some cases to passing resolutions that affirm the autonomy of the college. Often the Commission must state its position in writing to the

tribal government. It is as though the tribal government doesn't trust the college or at least wants some assurance that the changes the college is requesting are really necessary. Usually this is enough for the Council to capitulate and make changes or write acceptable resolutions.

The third and most visible and volatile time a tribal government may interact in the accreditation process is when a tribal government initiates an action that has a direct impact on the accreditation of the college. At College 2, the Tribal government removed board members. At College 3, the Tribal government was forced, by the conditions of its own constitution, to act on a resolution to remove the college president. Most commonly, tribal governments will, almost unwittingly, bring colleges out of compliance while restructuring their internal tribal organizations as occurred at College 1, 5, 7 and 8. In these cases, when informed that their actions have negatively impacted the Colleges, the tribal governments often perceived that their sovereignty had been challenged and in this situation the issues of power and control fully emerged. Some of the events generated very public crises, as at College 2. In other "Big Events", as at College 5, negotiation and information dissemination were used to resolve the "Big Event". While at College 3, the tribal government came up with a compromise solution and the College President encouraged the Commission to give her time to work out the problem.

"Big Events" Summary

A "Big Event" occurred at College 1, in 1997, after Initial Accreditation was granted. The Tribal Council moved to restructure the Tribal government and rejuvenate all Tribal boards, commissions and committees. The College addressed the situation when it successfully requested that the Tribal Council exempt the College from the restructuring efforts. The Commission wrote a letter supporting the College's position.

College 2 experienced its first "Big Event" in 1992-1993. Initial Accreditation had been granted in 1985. The second "Big Event" occurred in 1996-1997. Both events were triggered by the Tribal Council's removing College governing board members. The "Big Events" resulted in Show-cause and Probation orders being issued. Charter and by-law amendments negotiated with the help of the Commission resolved the situation.

College 3 experienced a "Big Event" in 1992-1993. The event centered around a Tribal Council resolution to terminate the president of the College. A member of the tribe presented the resolution to the Council. The Tribal constitution and by-laws allow any member to present Tribal resolutions. Another amendment was presented to address the same concerns by amending the way in which the governing board of the College would be chosen, and calling for a review of the College's audits. The second more moderate resolution was passed, while the first one failed. The Commission was aware of the situation, but at the request of the College President, did not

become involved. This event occurred after the College received Initial Accreditation.

College 4 did not experience a "Big Event". College 5 experienced a "Big Event" that moved along two lines at the same time. College 5 was a Candidate for Accreditation at the time the events occurred. One issue was the "regulatory" provisions in the charter identified by the Commission. The second issue involved the Tribal Council's moving to unify all tribal education programs. The College successfully reacted to the events by helping all parties make informed decisions through direct negotiation. The Commission played a part in the events by writing "position papers" that became part of the information the Tribal Council and the College referred to in their negotiations.

College 6 did not experience a "Big Event" although it experienced sustained pressure by the Commission to revise its charter and by-laws to insure autonomy. In 1995-1996, College 7 experienced a "Big Event" when the Tribal government, which was experiencing an economic downturn, attempted to reorganize all tribal government to increase efficiency and improve cost effectiveness. The College had gained Initial Accreditation at the time of the "Big Event". The situation was resolved by the College requesting and getting an exemption from the most intrusive changes. The Commission wrote a letter supporting the College's request for an exemption.

College 8 experienced a "Big Event" in 1996, when the Tribal Council attempted to change College Board member terms and appoint a new Chair of the Board. The College had gained Initial Accreditation prior to the "Big Event". The Commission wrote the Council, gently reminding the community that the College needs to have autonomy. The situation is still in progress.

"Big Events" or conflicts where the tribe, the Commission, and the College are all involved, have occurred most often after initial accreditation has been achieved. The Tribal Council, having retained the power to appoint and remove boards, usually acts in these areas. It may act under the guise of efficiency and cost effectiveness; or by bringing all education endeavors into alignment; in bringing uniformity to the terms of all tribal boards, committees and commissions; or in exercising its right to remove board members. As seen in Appendix L, the Tribal governments' interactions with the Tribal Colleges are spread along a continuum from no documented interference to attempts to remove the President and removal of Board members. Most times, the Tribal governments move into conflict situations with the Colleges indirectly. The actions that bring the Colleges out of compliance with accreditation standards seem unwitting, but could in reality, reflect a move by the Tribe to bring the Colleges "back into the fold". College 3 acknowledged that the Tribe had granted the College an unusual amount of

autonomy. The unspoken words were unusual amount of autonomy *when compared to other tribal corporations..*

These events characterize the struggle tribal governments are having to adjust to a new definition of control and the new relationship with the college it brings. The tribal governments need to see and appreciate the colleges as more than a source of jobs for tribal members and a source of funds through grants and contracts. Under the old paradigm, the college represents jobs and the council is in the business of getting as many jobs for tribal members as possible (Lopach, Brown & Clow, 1990). As an example, at College 7, the Tribal Council passed a resolution, that was later rescinded, that would have forced the college to hire more tribal members with minimal concern for the need for advanced degrees. As one college President said "These colleges offer their people and their tribes the opportunity to improve economically, socially, and have a richer and improved tribal life style for everyone" (College 4, 1987) and to achieve this requires the tribal governments to take a longer-term view.

The type of control that the tribal governments are going to have to accept is not going to be direct operational, accounting and supervisory control that they were used to, but indirect control through appointments and oversight. The tribal governments are learning the new system, and each "Big Event" can be seen as a working out of this issue in concrete terms. The Tribal Council that chartered College 2 expressly acknowledged in a

resolution that its relationship with the College is determined by what the Northwest Association of Schools and Colleges and its eligibility requirements and standards dictate. Even though the Tribal Council states that it understands the new relationship and its origins, it seems not to be able to make its actions consistent with its words. This Tribal Council has been involved in the most serious sanctioning situations in this study. On the other hand, Colleges 4, 5 and 8, under the direction of strong leaders, seem to have been able to facilitate the shifts in Tribal government attitudes. At the same time, Colleges 2 and 7 seem locked in a relentless repetition of the same problems with little change in tribal government attitudes.

Tribal governments generally are not able to supply a significant amount of the operating funds for their college. One might think that because there were no funds there would be little control. This is not so. Since tribes don't have money, providing access to funds is tantamount to funding outright. Tribal governments charter tribal colleges. Without the charter, the colleges would not be eligible for TCCCAA funds. Funding does not drive issues for tribal colleges in the same way it does for other colleges, because the tribal governments are not able to demand compliance by withholding funds. Tribal governments move to control the colleges and its funds and jobs for all sorts of reasons. It appears that as a college becomes more successful a tribal government may move to control the college. When a tribal government experiences economic setbacks, the tribal college becomes

an attractive source of potential funds. Sometimes, it seems for no reason other than the tribal college catches the eye of the tribal government, a tribal government may move to reassert control over a tribal college.

Charters and By-laws, a Closer Look

Colleges 4, 7 and 8 each have a separate tribal resolutions that establish the colleges, with the articles of incorporation from the tribe coming later. For all the other colleges, the articles of incorporation are the charters. Sometimes the by-laws and the articles of incorporation are the same document. Provisions found in these documents lay out the official working relationship between the colleges and the tribal governments.

For all the colleges, articles of incorporation follow a general incorporation pattern that involves most of the following: the name of the corporation, the purpose, the powers, the duration, and the address of the corporation being formed. Six of the charters begin with a statement whereby the tribe cites the authority it has for granting this charter or incorporating this organization.

The Charters for Colleges 1 and 2 are similar, suggesting that they may have originally come from the same form. This is also true of Colleges 4, 7, and 8. The first set of Charters is different from the second set. College 2 now has the most consistent and clear charter and by-laws. College 1 continues to operate under an older charter that is one of the more simple in this group. Three colleges have developed unique forms. College 5 has the most detail

concerning business operations and management. College 6 begins with a mission and philosophy statement that includes a poem and continues with a charter that includes many standard by-law type provisions. College 3's charter is Part B of a Tribal resolution that deals with all the educational services on the reservation. The charter is one of the simplest, leaving most of the detail to the by-laws.

Interfering and regulatory provisions were especially noticeable in College 5's charter. A primary concern, in the early years, seems to be that the colleges would accumulate debt in the tribe's name and leave the tribal government to pay off the claim. The tribes also feared that the colleges might be involved in lawsuits and that the tribes would be named. Some of the regulatory and limiting aspects of the charters and by-laws addressed these concerns.

Colleges 4, 7 and 8 use the same standard language, incorporating into the charter a unique provision that "No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing and distribution of statements) any political campaign on behalf of any candidate for public office." College 3 also has the "no propaganda" clause, but is not similar in other ways to Charters at Colleges 4, 7 and 8. Also, these three colleges and College 5 have similar provisions authorizing the Tribal Council, at all times to have "power

to prescribe such regulations, provisions and limitations as it may deem advisable, which regulations, provisos and limitations shall be binding upon any and all corporations subject to the provisions of this ordinance”, and the Tribal Council maintains the power to amend, repeal or modify this ordinance at its pleasure. The “no propaganda” provisions found in Colleges 4, 7 and 8 may have arisen because of the Tribal government’s experience with OEO organizations. In the past, some OEO organizations on reservations had become the power base for opposition candidates to challenge the tribal council.

College 7 is incorporated under the laws of the state of Montana. In 1996, the Tribe’s Community Council suggested changes to the charter that included a section in the resolution that said “should sections of the Articles of Incorporation conflict with the Amended Charter, the Board of Directors must amend the Articles of Incorporation and the by-laws to be in conformance with the law at all times...” (see Appendix R, Charter and By-Law Data, for a listing of the proposed changes). It is unique for a College to incorporate with the state and to be simultaneously chartered by the Tribe. The Tribe is uncomfortable with the situation and when there was a “Big Event” the state charter was mentioned even though it did not directly relate to the issue.

As the colleges matured, they became a political and economic asset, and so the tribal government have sometimes tried reassert its control.

Deloria and Lytle (1984) describe the tribal colleges' fear when talking about tribally created organizations: "By the same token, some of the agencies created by the tribal council are subject to the political whims of council members, to the point where administration of programs is simply a matter of patronage distribution" (Deloria & Lytle, 1984, p. 49).

Chapter 5 Summary, Discussion, and Implications

This study was driven by the comprehensive question: What was the effect of accreditation on the governing board structure and relationship with tribal governments at the eight tribal colleges in the Northwest Association of Schools and Colleges? Subsidiary questions included:

1. When the tribal governments established the original College governing boards how were the following structural questions answered?
 - How were governing board members selected?
 - How many members served on each governing board?
 - For how long did governing board members serve?
 - Were the terms of governing board members staggered?
 - Did students serve on the governing boards and, if so, in what capacity?
 - What powers did the tribal governments retain over the governing boards?
 - Were there unique provisions in the chartering documents?
 - What changed in these areas during the years studied?
2. What did the Northwest Association of Schools and Colleges, through its review of self-studies and site visits, perceive as deficiencies (if any) or commendations (if any) in the College governing board structure at the eight tribal colleges? Were there

problems that affected accreditation in the relationship between the colleges governing boards and the tribal governments?

3. Did the tribal governments take actions that jeopardized the accreditation of the colleges? What were those actions? When did they occur in the accreditation process? Why were the actions taken?

Summary-Original Charters

The original charters, Articles of Incorporation, by-laws, and tribal resolutions created by the tribal governments established the structure of the governing boards at the colleges. These documents also record the important conditions each of the tribal governments placed on its association with its college. The original membership of the governing boards ranged in size from five to twelve. One college had a governing board of six, three had seven member boards and two had eight member boards. The boards served short terms with the average being two and three-quarters years. The range was from one year to four years. At five colleges, the terms served by the board members were not staggered creating the possibility of an all new board with the ensuing loss of institutional memory and the possibility of changes in policy directions and presidents. All governing boards were originally appointed by the tribal government.

After the initial appointments, six tribal governments continued to appoint the college boards. At College 3, the majority of the board members

were elected. Four Colleges had student members on the governing board. In three cases the student members were voting members. At three of the colleges, the students chosen as members of the board were the Student Body Presidents. At the other college, the student member of the board was a person selected by the student body at large.

All tribal governments at this stage retained significant oversight powers. At Colleges 4, 7 and 8, the Tribal governments retained the power to prescribe such regulations, provisions and limitations as they deemed appropriate. At College 5, a wide range of activities required prior approval of the Business Committee. At College 1, the Tribal Council retained the right of final review of all of the College's actions, while at College 3, the Tribal government retained the power to review and reverse College actions. At College 2, the Tribe kept the right to "fire" Board members. At College 6, no mention was made of the Tribal government's powers to review or the need for prior approval.

Six of the colleges were required to make reports to the tribal government. These reports varied from "when asked for" and yearly fiscal reports to periodic reports to the Board and Business Council, with no mention of content. Colleges 4, 7 and 8 were required to make annual reports on finances, enrollment of tribal and non-tribal members, and a general "State of the College" description. At Colleges 1, 3, 4, 6 and 7, a clause that "no substantial part of the activities of the corporation shall be the carrying on of

propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in a (including the publishing and distribution of statements) political campaign on behalf of any candidate for public office" was included in chartering documents.

Commission on Colleges-Reactions to Chartering Documents

When commenting on the charters, Articles of Incorporation, by-laws, or tribal resolutions, the Commission on Colleges focused on four main provisions. The first and most often addressed concern was with the need for organizing documents that assured the college governing board the necessary powers and attendant freedoms to govern the college. This is the essence of the delegated power/retained control issue with the tribal governments. The tribal governments wanted to retain power beyond appointing the governing board of the college, but also wanted to be separate enough to keep the College from involving the tribal government in any fiscal problems or law suits. The Tribal governments also did not want the colleges to become a political force on the reservation. Hence, provisions insisting on neutral positions during elections and prohibiting the carrying out of propaganda or attempting to influence legislation were inserted in many college charters. The tribal governments also wanted the colleges to agree to uphold the tribal code, again to insure that the colleges do not become involved in radical or reform movements that affect tribal government. These provisions did not concern the Commission evaluators.

It was the retained power—such as the power to review all actions of the college, the power to prescribe such regulations, provisions and limitations as the council may deem appropriate, the power to dismiss board members, and the need for the college to get prior approval before hiring a lawyer or consultants, borrowing funds or executing leases—that concerned Commission. These provisions were not of concern if the President of the college exhibited strong leadership skills and the college was operating smoothly. These provisions became points of controversy when “Big Events” occurred.

The Commission also focused on the need for staggered terms for members of the governing board as a means of preserving institutional memory. There was a continued concern with the need for up-to-date, clearly written and defined by-laws, policy manuals, and job descriptions. In an issue that affected the board-college relationship, the Commission sought clear statements that board members will have no contractual relationship with the college.

The charters today

Half of the colleges have kept the same sized board as when they were originally established. One College decreased the size of its board, while the other three increased the size. The boards range in size from the smallest having five members to the largest having fourteen. Two colleges each have six, seven and nine member boards respectively. The term lengths vary from

two years to five years. Four colleges have varying terms for board members. Most colleges now have terms that are staggered. The terms vary from one year for students, to as long as the person holds a certain position. At one college, the Tribal Council members serve until the next "reorganization of the Council". Four colleges do not have a student serving on the Board. Of the four colleges that have students who serve on the board, only two allow them to vote on issues.

Observations and discussion

Tribal colleges exist in an environment composed of other organizations that offer legitimacy and access to funds in return for compliance with organizational relationships and structures. The colleges, being new and in need of legitimacy from the reservation community and the larger community, sought charters from the tribes and accreditation from the Northwest Association of Schools and Colleges. In turn, the charters and accreditation gave the colleges access to funds from the federal government. This has created an environment where conflict is built in by the conflicting rules and missions of the various organizations that make up the tribal colleges' environments.

The significant organizations in the tribal colleges' environment all have written, quasi-legal relationships with the colleges. The colleges must "get" from each organization something they need to exist. Tribal colleges "got" legal existence and local legitimacy from the tribal governments and

thereby access to federal funds. From accreditation, the colleges "got" a wider legitimacy and access to more substantial funds. From the federal government, the colleges "got" funds. With the funds and legitimacy came requirements that tended to conflict with the tribes' ideas of control. The tribal governments kept some control over the colleges. Accreditation required compliance with standards concerning governing boards and their relationship to their chartering entity . The federal government wanted the colleges to stay tribally chartered and accredited.

The tribal colleges don't have many choices. The organizational environment places them in the position where they are squeezed between the expectations of the tribal government and the Accreditation Commission. The Commission's agenda is highly structured and formulated. It is enforceable because of federal funding conditions. The tribal governments have less structured, but highly visible and understood agendas that for the most part predispose them toward a self-interested view revolving around power and jobs. It is also enforceable because of federal requirements for the colleges to be tribally chartered.

From this analysis of the Colleges' environments flows a series of important observations. The Colleges have succeeded and flourished in this environment. The Colleges have changed to accommodate accreditation requirements. The Commission has protected the Colleges from the tribal government. The Colleges paid a price for this "protection". The price was

an “acceptable” governing board structure. In summary, the Colleges lost a piece of their “Indianness” as they lost their intimate connection to the tribal government; but what they lost may be a very dysfunctional piece that jeopardized their survival.

Another observation that emerged from this research is that the most successful colleges reframe their relationship with the tribal governments in terms of sharing the status a viable tribal college brings to the reservation and the resulting improvements in the quality of life. The paradigm shift is from the old ideal of centrally-controlled tribal enterprises or corporations to a more equal, cooperative, and mutually enhancing model of collaborative tribal organizations. Even though the shift is driven by accreditation needs, the shift is singularly important if the colleges are to move from just surviving to being very successful.

The tribal governments are not comfortable with other tribal organizations that are of equal stature, fearing the development of alternative political power bases. The OEO experience taught the tribes that educational and community action programs can quickly become pivotal in reservation politics. The most successful colleges have learned to reassure the tribe that the College’s success is the tribal government’s success and the reservation’s success, not a stepping stone to replace the tribal government. This is a difficult task, as the tribal governments experience frequent turnover and the lesson must be taught and retaught to each succeeding tribal government,

until the College's reputation and separation are firmly established and the new way of interacting is ingrained in the system. Colleges walk an especially fine line between their mission to serve the needs of the community and not stepping on the toes of the tribal government as it tries to serve those same needs.

Implications

This final set of observations is to be thought of as what a tribal college president or board members might learn from this research.

The first piece of information that might be gleaned from this research is that a colleges' relations with a tribal government are never fixed or resolved. There is no way to avoid friction as it is structural. This leads to the need for sustained attention in this area. Therefore, as the college presidents that have had the fewest problems say, there is a need to continually work hard at communication and creating a working relationship with the tribal government.

Information communicated in a neutral, respectful manner, paying attention to all protocol issues is important. It is best to participate in all task forces, fact finding committees and any other information gathering groups. The groups will gather the information with or without the help of the college. By participation the college avoids one source of criticism and the college might be able to get accurate and positive information to the group. When seeking legal advice about an issue, presidents and boards should not

send a copy of the opinion to other parties, unless the comments are part of a well thought out letter designed to be part of a negotiating strategy. Legal language and opinions tend to harden positions leaving little room to work out a solution.

Another implication that flows from this research is that developing good board members is a must. In the United States there is a fundamental belief that there is wisdom generated when a group of people make collective decisions. What is not understood as well is that even though the act of making a collective decision is a natural response, people who are asked to make decisions must be taught how to get to the point where they can make those all important collective decisions wisely. People are not instinctively knowledgeable about the nitty-gritty of being a board member, and need help learning how to be effective board members. Board member selection and training becomes extremely important with the short terms and high turnover experienced in many colleges.

Presidents can be too close to tribal government and this can trigger a "Big Event". Inevitably, with presidents being drawn from the reservation community, there will be situations where the president is related to or part of the family of politically powerful tribal leaders. The inclination might be to tap into this source of support when experiencing difficulties within the college. This is not a good idea, as experience has shown. The reservation community is always quick to separate along historic family and political

lines; and with the college trying to get a new way of interacting going, reverting to family/political power bases sets this new way back

The use and timing of the Commission's clout in tribal government-tribal college power struggles is very important. The fact that the tribal government is in fact limited in its actions toward the college if accreditation is to be attained and kept is a very powerful weapon for college autonomy. But the Commission must not get involved until they are absolutely required. It seems best to ask for the Commission's opinion on a particular governance situation, if one really does not know how certain actions will affect the college's accreditation. But, college leaders should not publish the Commission's opinion while the situation is still fluid. The proper time for the Commission to intervene is when the tribal government has done something that brings the college out of compliance.

The Commission is in the end reactive, not proactive; even though a proactive manner might seem to head off explosive situations. This is not to say that the college sits idly by as the tribal government interferes in college business. The college must monitor the situation, move to prevent major governance intrusions, but without Commission involvement until action has been formally taken. This is because Commission involvement muddies the real issue, which is how the college and the tribal council are going to work together. It is too easy to call on the Commission to say how it thinks the situation should be resolved. This generally inflames the tribal

government who feel this non-governmental association is telling them what to do. The Commission also will advocate a traditional solution to the problem. A traditional solution is one that fits the accreditation standards exactly and completely. The college and the tribe lose the opportunity to develop their own way of doing things, which the Commission is usually willing to go along with if it works. This is especially true when stability and policy making are thereby enhanced.

Suggestions for further research

During the course of this research several new topics emerged that point out how rich and untouched this area of inquiry is. This research focused on one of the six regional accrediting associations that exist in the United States. An interesting and logical extension would be to replicate this study at the other regional accrediting associations, to complete the picture of tribal colleges and the effects of accreditation. Because the study relies on documents and historical analysis, companion studies would be especially effective in generating a more complete picture of this topic.

Another approach to extending this topic would be to use a case study methodology to examine in more detail the principal understandings and insights. The case study provides the opportunity to look at a single college and to study more closely the interactions between the college board and administrators, the tribal governments and the Commission on Colleges.

Tribal governments were active participants in the interactions that were the basis for this study. Tribal governments, themselves, present a rich area to be studied. Tribal governments are most often studied and written about in their relationship with the federal government. There is very little information available about tribal governments in their relationship to the reservation and other organizations at the local level. A suggestion for further research would be to study tribal governments, their environment, and how the tribal governments affect the reservation.

Another area for further study is the relationship of the developmental phase of the college, the accreditation phase and the occurrence of a "Big Event". There are new Tribal Colleges being established every year. It would be especially helpful to them if the factors that precipitate a "Big Event" were more fully understood.

This research focused on the governing board and the pressures that shaped it. Other areas that also were the focus of similar pressure were the curriculum and the faculty. A suggestion for further research would be to focus on how accreditation affected the development of the curriculum and/or the faculty at tribal colleges.

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Appendix A, Enrollment and Budget Data

Information is based on the previous year's enrollment.		Colleges submitted enrollment data the year after they received Candidate for Accreditation status.																	
		1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997
College 1	FTE	69.00	57.00	149.42	143.75		193.00						117.33	150.83	124.40	167.83	128.40	208.33	196.34
	Headcount				141.00	229.00							345.00	225.00	368.00	407.00	378.00	531.00	460.00
College 2	FTE	82.00	105.00	258.75	185.83	186.92	183.41	237.58	232.40	197.00	284.25	256.67	269.42	284.20	377.00	404.00	377.50	395.00	398.75
	Headcount	142.00			272.00	297.00	297.00	270.00	284.00	286.00	320.00	287.00	275.00	435.00	437.00	456.00	565.00	399.00	432.00
College 3	FTE						92.30	87.38	80.00	95.84	104.00	211.95	248.00	200.25	258.00	241.00	271.25	231.00	247.00
	Headcount						142.00	251.00	375.00	375.00	144.00	251.00	260.00	226.00	296.00	452.00	299.00	275.00	
College 4	FTE		151.00	235.00	308.00	257.00	325.00	301.00	499.00	606.00	540.00	540.00	451.00	540.00	511.00	799.00	879.00	610.00	760.00
	Headcount					456.00	561.00	653.00	1077.00	834.00	730.00	730.00	685.00	749.00	715.00	960.00	994.00	953.00	1044.00
College 5	FTE		45.00	37.00						351.42	478.00	509.00	509.00	679.00		559.87	537.07	655.38	560.38
	Headcount									822.00	731.00	979.00	979.00	1207.00	2821.00	1350.00	1416.00	1300.00	1608.00
College 6	FTE								137.00	125.00	124.53	184.25	154.33	219.58	357.92	341.17	337.42	410.58	339.67
	Headcount								287.00	205.00	204.00	187.00	226.00	303.00	395.00	364.00	355.00	412.00	439.00
College 7	FTE									125.25	131.25	129.00	109.33	159.50	174.00	187.42	569.477	580.00	134.40
	Headcount									142.00	148.00	132.00	125.00	243.00	232.00	254.00	559.00	665.00	171.00
College 8	FTE											125.10	118.00	108.83	193.30	205.75	196.75	218.00	173.17
	Headcount											137.00	138.00	130.00	266.00	276.00	276.00	229.00	195.00

YEAR	1989	1990	1991	1992	1993	1994	1995	1996	1997
College 1									
Operating Budget			\$1,478,501	\$1,440,440	\$1,393,116	\$1,505,039	\$1,701,302	\$1,739,741	\$1,595,740
Deficit-operating			\$14,647	\$14,647	\$20,710	\$13,633	\$95,211	\$0	\$0
Deficit-accumulated			\$70,000	\$94,680	\$40,208	\$0	\$95,211	\$0	\$0
College 2									
Operating Budget			\$2,035,000	\$2,510,481	\$2,621,902	\$2,432,985	\$2,734,335	\$3,745,387	\$5,319,345
Deficit-operating			\$0	\$0	\$0	\$0	\$0	\$0	\$0
Deficit-accumulated			\$0	\$0	\$0	\$0	\$0	\$0	\$0
College 3									
Operating Budget			\$1,383,497	\$1,135,817	\$1,699,315	\$890,000	\$2,238,266	\$2,166,072	\$3,543,337
Deficit-operating			\$0	\$0	\$0	\$0	\$0	\$0	\$0
Deficit-accumulated			\$0	\$0	\$0	\$0	\$0	\$0	\$0
College 4									
Operating Budget			\$6,014,443	\$5,918,566	\$8,483,431	\$10,402,164	\$11,671,077	\$12,778,818	\$15,807,133
Deficit-operating			\$0	\$0	\$0	\$0	\$0	\$48,672	\$0
Deficit-accumulated			\$0	\$0	\$0	\$0	\$0	\$1,448,673	\$0
College 5									
Operating Budget			\$1,178,439	\$3,847,614	\$3,598,579	\$4,774,795	\$4,935,502	\$4,400,594	\$1,580,713
Deficit-operating			\$0	\$0	\$0	\$0	\$0	\$0	\$0
Deficit-accumulated			\$0	\$0	\$0	\$0	\$0	\$0	\$0
College 6									
Operating Budget			\$1,242,872	\$2,079,338	\$2,159,279	\$2,169,674	\$1,140,771	\$2,510,772	\$3,787,736
Deficit-operating			\$93,578	\$0	\$0	\$0	\$0	\$31,316	\$65,070
Deficit-accumulated			\$750	\$0	\$0	\$0	\$0	surplus	surplus
College 7									
Operating Budget			\$617,893	\$1,085,885	\$1,615,541	\$1,843,253	\$1,980,153	\$2,830,163	\$2,823,273
Deficit-operating			\$0	\$0	\$0	\$0	\$0	\$0	\$478,189
Deficit-accumulated			\$0	\$0	\$0	\$0	\$0	\$117,856	\$569,045
College 8									
Operating Budget			\$488,996	\$2,679,288	\$3,606,021	\$3,278,647	\$4,257,873	\$4,060,303	\$4,077,940
Deficit-operating			\$34,729	\$0	\$0	\$26,599	\$0	\$0	\$0
Deficit-accumulated			\$0	\$0	\$0	\$57,672	\$0	\$0	\$0

Appendix B, Relevant Eligibility Requirements and Standards from the
Accreditation Handbook, Northwest Association of Schools and
Colleges

Essential Eligibility Requirements

1. It has formal authority from the appropriate governmental agency to grant degrees. If the institution is located in a state which has only minimal requirements for chartering but also a higher level of authorization to operate and grant degrees, this higher level is required.
2. It has a governing board which has the authority to carry out the mission of the institution. The board has at least five voting members, a majority of who have no contractual, employment, or personal financial interest in the institution.
3. Although it is understood that an education institution would be in reasonable harmony with its founding and sustaining organizations, a high degree of intellectual independence of its faculty and students is expected. An institution owned by or related to an outside agency, such as a church, a business organization, or a labor union, should ensure that it maintains an atmosphere in which intellectual freedom and independence exist.
4. It has a chief executive officer whose full-time or major responsibility is to the institution.

Standard Six - Governance and Administration

Standard 6.A - Governance System

The institution's system of governance facilitates the successful accomplishment of its mission and goals.

- 6.A.1 The system of governance ensures that the authority, responsibilities, and relationships among and between the governing board, administrators, faculty, staff, and students are clearly described in a constitution, charter, bylaws, or equivalent policy document.
- 6.A.2 The governing board, administrators, faculty, staff, and students understand and fulfill their respective roles as set forth by the governance system's official documents.

- 6.A.3 The system of governance makes provision for the consideration of faculty, student, and staff views and judgments in those matters in which these constituencies have a direct and reasonable interest.
- 6.A.4 In a multi-unit governance system (state or district), the division of authority and responsibility between the central system office and the institution is clearly delineated. System policies, regulations, and procedures concerning the institution are clearly defined and equitably administered.

Standard 6.B-Governing Board.

The governing board is ultimately responsible for the quality and integrity of the institution (or institutions in the case of the multi-unit system). It selects a chief executive officer, considers and approves the mission of the institution, is concerned with the provision of adequate funds, and exercises broad-based oversight to ensure compliance with institutional policies. The board establishes broad institutional policies, and delegated to the chief executive officer the responsibility to implement and administer these policies.

- 6.B.1 The board includes adequate representation of the public interest and/or the diverse elements of the institution's constituencies and does not include a predominant representation by employees of the institution. The president may be an *ex officio* member of the board, but not its chair. Policies are in place that provide for continuity and change of board membership.
- 6.B.2 The board acts only as a committee of the whole. No member or subcommittee of the board acts in place of the board except by formal delegation of authority.
- 6.B.3 The duties, responsibilities, ethical conduct requirements, organizational structure, and operating procedures of the board are clearly defined in a published policy document.
- 6.B.4 Consistent with established board policy, the board selects, appoints, and regularly evaluates the chief executive officer.
- 6.B.5 The board regularly reviews and approves the institution's mission. It approves all major academic, vocational, and technical programs of study, degrees, certificates and diplomas. It approves major substantive changes in institutional mission, policies, and programs.

- 6.B.6 The board regularly evaluates its performance and revises, as necessary, its policies to demonstrate to its constituencies that it carries out its responsibilities in an effective and efficient manner.
- 6.B.7 The board ensures that the institution is organized and staffed to reflect its mission, size, and complexity. It approves an academic and administrative structure or organization to which it delegates the responsibility for effective and efficient management.
- 6.B.8 The board approves the annual budget and the long-range financial plan, and reviews periodic fiscal audit reports.
- 6.B.9 The board is knowledgeable of the institution's accreditation status and is involved, as appropriate, in the accrediting process.

Appendix C, Data Collection Sheet

DOCUMENT Name and Date

College: _____

Document Id. _____

Location of document _____

Today's Date: _____

Description of Document

Event/ action with which document is associated:

Actors:

Notes:

IS DOCUMENT CONCERNED WITH AND/OR CRUCIAL TO THE TRUSTEE FUNCTION OR AUTONOMY? (other words to describe trustee function-board of trustees or regents, advisory groups board of directors, governing board, governing committee, etc. alternative words that might be used when talking about autonomy--outside influence. academic freedom, need to distance. too much influence, too tightly linked, etc.

Trustee functions

How are board members chosen?

Number on board?

Length of term.

How is the board organized?

Problems or issues.

Autonomy

Significance or importance of document:

Implicit or explicit influence involved?:

Appendix D

College 1. Interaction Data

Action #	Type of Action, by College	Available?	Response by Commission Were governing boards an issue?
Stage 1			
1	1979 May Application for consideration for candidacy. 1979 June Application for consideration approved.	YES	No.
Stage 2			
2	1979 Oct. Site visit based on self-study. 1979 Dec. Approved as candidate for accreditation.	YES	Yes. There is a need to review the charter of the institution for guarantees of institutional autonomy in fiscal planing and budgeting.
Stage 3			
3	1981 Oct. Biennial report and site visit 1981 Dec. Biennial report accepted and candidacy reaffirmed	Yes	No. Concerned with financial stability
4	1983 May. Biennial report and site visit. 1983 June Biennial report accepted and candidacy reaffirmed	YES	No. Concerned with sound financial control system.
5	1985 Oct. Full scale site visit based on self-study (Tried to postpone) 1985 Dec. Denied initial accreditation. Candidacy status terminates January, 1986. Two separate individuals write to encourage Commission not to accredit the College.	YES	No.
6	1986 March Appeal for lose of initial accreditation.	YES	No. The problem appears to be financial.
Stage 1			
7	1989 April Reapplication for consideration for candidacy submitted. 1989 June Application for consideration accepted, okay to proceed with self-study. College claims a few malcontents on staff got the attention of the evaluators and were able to get their negative views heard and "torpedoed " the site visit.	YES	No.

Stage 2

8	<p>1989 Oct. Site visit based on self-study.</p> <p>1989 Nov. Withdrew application for candidacy, with commitment to resolve the visiting teams concerns.</p>	YES	No.
9	<p>1990 April Supplementary report and visit by one Commission member.</p> <p>1990 June Approved as candidate for accreditation.</p>	YES	No.

Stage 3

10	<p>1992 Biennial report and visit.</p> <p>1992 June Biennial report accepted and candidacy reaffirmed.</p>	YES	<p>No. The concern is with well structured board and institutional policies. Also concerned that some of the board members don't understand how policy is initiated, developed and adopted and many are not aware of how where and how it is maintained.</p>
11	<p>1994 Biennial report and visit.</p> <p>1994 June Biennial report accepted and candidacy reaffirmed, with conditions--focused interim report, spring 1995.</p>	YES	<p>No. Concern was with communication between administration and staff.</p>
12	<p>1995 Focused report and visit.</p> <p>1995 June Candidacy reaffirmed.</p>	YES	No.
13	<p>1996 April Full scale site visit based on self-study.</p> <p>1996 June Initial accreditation granted.</p>	YES	No.

Appendix E

College 2, Interaction Data

Action #	Type of Action	Available?	Response by Commission
	Stage 1		Were governing boards an issue?
14	1979 Aug. Application for consideration for candidacy submitted, approved, and site-visit scheduled for	Yes. (Summary of reports).	No. Commission concerned with college finances.
	Stage 2	NO	
15	1979 Oct. Site visit based on self-study 1979 Dec. Approved as candidate for accreditation		
	Stage 3	NO	
16	1981 Oct. Biennial report and visit. 1981 Dec. Biennial report accepted, candidacy reaffirmed with concerns. Request written biennial report and two person site visit		
17	1983 Oct. Biennial report and visit 1983 Dec. Biennial report accepted, candidacy reaffirmed	YES	No
18	1984 Full scale site visit based on self-study 1985 Dec. Initial accreditation granted, with conditions, focused interim report and visit in spring 1988 (making the third year progress report a focused report)	YES	Yes. Our primary concern was the relationship between the college and the tribal council. While you seem to have a good relationship, we see this associations an extremely important one for the college since you derive financial and other support from the council. Probably this relationship is very sound, but we will be looking into verify this when we visit you next.
19	1988 April Focused interim report (and third year report) and visit 1988 June Accreditation reaffirmed with request for progress report, spring 1989	YES	No. Primary concerns included lack of communication and information sharing among and between faculty and staff; series of concerns regarding the deterioration with compliance in financial status and stability in faculty and staff assignments.
	Stage 4		
20	1989 April Written progress report 1989 June Report not accepted. Request report for Oct. 15, 1989 1989 Oct. Resubmit progress report. 1989 Dec. Report <i>received</i> . 1990 June Fail 1989 report accepted.	YES	No. Not enough information. Additional concerns include budget, staffing and space allocation for the library, and adequate physical facilities for new programs.

- | | | | |
|----------------|--|-----|--|
| 21 | <p>1990 Oct. Fifth year self-study and full scale visit</p> <p>1990 Dec. Accreditation reaffirmed with conditions--focused interim report and visit in 1992</p> | Yes | <p>Yes. The college is fortunate to have such a dedicated and interested Board. However, this intense concern for the college must not move the Board into administrative roles. This concern was noted in the 1985 evaluation report and it has arisen again with this evaluation team. General theme--organizational relationships. A clear understanding by all members of the college community of organizational relationships accompanied with the clear realization of policy and administrative roles. A need for clear organizational lines between the Board and administration, staff and faculty... and greater leadership provided by Board. President and deans to accomplish the foregoing.</p> |
| 22 | <p>1992 April Focused interim report and visit.</p> <p>1992 June Accreditation reaffirmed with condition-- report in fall 1992</p> | YES | <p>Yes. With regard to progress towards a clear understanding by all members of the college community of organizational relationships...is perhaps the greatest factor toward progress on this recommendation was the substantial change in senior administration of the College since 1990.</p> |
| Stage 5 | | | |
| 23 | <p>1992 Fall Report submitted.</p> <p>1993 June Show cause, must write response and host small committee in Oct. 1993.</p> <p>1993 Aug. Fact finding committee visits.</p> <p>1993 Nov. Show-cause order removed via telephone.</p> <p>1993 Dec. Affirmed removal of show-cause and requests focused interim report and host visit in spring 1994</p> | YES | <p>Yes The College recognizes that from May 6, 1993 until July, 1993 the College was out of compliance with the Eligibility requirements 2 and 3 and Standard VII. This was due to the extra-ordinary circumstances which evolved during 1992-1993 school year, which resulted in the removal of members and leaving the College without a voting board membership.</p> |

- 24** **1994 April** Focused interim report and site visit.
1994 June. Accreditation reaffirmed **YES**
- Yes. The council does respect the autonomy of the College charter, however, it was necessary for their involvement under these unusual circumstances. The Tribal Council is the authority on the Reservation who has the influence to police the performance of the board memberships whom they appoint.
- The Board indicated that in some respects, the problems of last year and the threat to the College's accreditation had greatly assisted in communicating to the Tribal Council and to the Tribe the importance of The Board's professional role and their autonomy.
- The board said they felt they had removed personal, family, and political issues from their board agendas and focused on the education of students.
- The members of the Tribal Council felt confident that the current relationship between the Tribal Council, The Board and the College is functioning as the Northwest Association of Schools and Colleges eligibility requirements and standards dictate.
- 25** **1995 Dec.** Deferred action on regular interim report and visit. Imposed probation. Imposed probation. Request focused interim report and host evaluation visit. 1996
1996 Dec. Continued probation and deferred action to reaffirm accreditation. Requests special progress report in spring 1997
1997 June Probation removed and reaffirmed accreditation **YES**
- Yes. In removing probation, the Commission noted with satisfaction the cooperative efforts by both the Board and the Council to successfully address the Commission's concerns regarding the governance and administration of the institution.

Appendix F

College 3, Interaction Data

Action #	Type of Action, by College	Available	Response by Commission Were governing boards and issue?
Stage 1			
26	<p>1983 Oct. Application for consideration submitted.</p> <p>1983 Dec. Application for candidacy accepted and goes ahead given to proceed with self-study and preparations for site visit.</p>	YES	Yes. It is not clear if the Board is truly a governing board due to contradictory statements regarding the makeup of the board.
Stage 2			
27	<p>1984 Site visit based on self-study.</p> <p>1984 June Approved as candidate for accreditation with condition--submit written description and confirmation of compliance re: the library.</p>	YES	No. The concern was with the library. The council has ultimate authority over anything that occurs on the reservation. However, the Council has rightfully granted unusual authority to the College, and it does not feel threatened in the least. President regularly submits reports to the Council secretary and chairman even though it is not required.
28	<p>1984 Submitted written description and confirmation of compliance.</p> <p>1984 Dec. Report accepted</p> <p>The Tribal Council (a meeting of the entire adult tribe members) has ultimate authority over anything that occurs on the reservation. However the Council has rightfully granted unusual authority to the College and does not feel threatened in the least.</p>	YES	No.
Stage 3			
29	<p>1986 April Biennial report and site visit.</p> <p>1986 June Biennial report accepted and candidacy reaffirmed with condition report in spring 1997.</p> <p>Response to evaluation committee report, biennial reports and visit. "The very basis of tribal college organizations tribal/local control."</p>	YES	No.
30	<p>1987 Spring Submit progress report.</p> <p>1987 June Progress report accepted</p>	YES	No.

31	<p>1988 Biennial report and site visit. 1988 June. Biennial report accepted and candidacy reaffirmed. Okay given to proceed with self-study and site visit planning.</p>	YES	No.
32	<p>1990 Full-scale visit based on self-study. 1990 June Initial accreditation granted at AA level. Self-study and site visit for initial accreditation. Granted, with focused interim report.</p>	YES	<p>No. The administrative organization is in many ways reflective of the personnel strengths and interests of the personnel rather than of an organizational structure planned first and staffed second.</p>
33	<p>1992 Focused interim report submitted. 1992 Accepted.</p>	YES	No.
Stage 4			
34	<p>1993 April Third year progress report submitted. 1993 June Third year progress report accepted.</p>	YES	No.
35	<p>1995 April Fifth year self-study and full scale visit. 1995 June Accreditation reaffirmed with conditions--focused interim report and visit in spring 1997.</p>	YES	<p>No. In the late 1980's and 1990's there was an indication of very serious attempts by the Council to make Board and management decisions regarding the operation of the college. Those efforts were a very serious matter, and while they were resolved with the charter amendment, there is still the potential for political interference in the governing board's responsibility to establish policy for the college. Since the charter amendment, the relationship seems to have improved and the Board has been left to make the policy decisions regarding the college operation.</p>
36	<p>1997 April Focused interim report and visit 1997 June Accreditation reaffirmed.</p>	YES	No.

Appendix G

College 4. Interaction Data

Action #	Type of Action, by College	Available?	Response by Commission. Were governing boards and issue?
Stage 1			
37	1979 Dec. Application for consideration 1980 Feb. Application for consideration accepted. Okay to proceed with self-study and host site visit.	NO. Actual application not available, but documents referring to it are available.	No.
Stage 2			
38	1980 Self-study and site visit. 1980 June approved as candidate for accreditation	NO. Actual self-study not available, but documents referring to it are available	No.
Stage 3			
39	1982 April Biennial report and site. 1982 June. Biennial report accepted and candidacy reaffirmed. Given okay to proceed with self-study and site visit planning.	NO. Actual report not available, but documents referring to it are available	No.
40	1984 April. Full scale site visit based on self-study. 1984 June Initial accreditation granted at associate degree level, with focused interim report and visit in 1986.	YES	No.
41	1986 April. Focused interim report and visit. 1986 June Accreditation reaffirmed.	NO	
Stage 4			
42	1987 April No third year report as such because the college is involved in substantive changes programs causing focused report and visit. 1987 June Accreditation reaffirmed. These colleges offer their people and their tribes the opportunity to improve economically, socially, and have a richer and improved tribal life style for everyone	YES	No. "It appeared to the visiting committee that the sometimes delicate relationship between the Tribal Council and the Board of Directors and the College Administration was defined and working to the maximum advantage of the College operation."
43	1989 April. Fifth year self-study	YES	No. "The Board of Directors, the Tribal

and full scale visit.

1989 June. Accreditation reaffirmed and extended to baccalaureate degree level to include one program with a progress report to address general recommendations.

Council and the college administration understand their respective roles as defined in accreditation, and very few, if any problems exist. The college President is widely respected as a local, regional and national leader in Indian education."

College 4 gets out of step because the college is submitting changes to its program regularly causing focused reports and visits and eventually leading up to a new comprehensive self-study and full scale site visit.

- | | | | |
|-----------|--|------------|-----|
| 44 | <p>1993 Oct. Full site visit based on self-study.</p> <p>1993 Dec. AA accreditation reaffirmed and BS accreditation granted (1 program only), with a condition--a written progress report in 1996.</p> <p>Stage 5</p> | YES | No. |
| 45 | <p>1996 Fall Progress report submitted responding to 6 recommendations from 1993 self-study and visit. Recommendations did not involve governance issues.</p> <p>1996 Dec. Third year progress report accepted.</p> | YES | No. |

Appendix H

College 5, Interaction Data

Action #	Type of Action, by College	Available	Response by Commission
	Stage 1 & 2		Were governing boards an issue?
46	1980 April Application for consideration for candidacy submitted.	YES	<p>Yes. "All decision so f the Board of trustees are subject to the Tribal Council. In fact, all members of the Board could be members of the Council. Thus, the Board of Trustees is not a "governing" board. Our standard on Administration states that the governing board "should act as a body politic, not subject to pressures (state, political, tribal) and should protect the institution from the same." While the Council may set parameters for the operation of the Board and School in its authorizing or chartering documents, the Board should have authority to govern and not be subject to political or tribal pressures."</p> <p>April 25, 1980 Reply to concerns. "Tribal groups have always been highly political by necessity to maintain their tribal identity, rights and cultures through increasing pressures by the rest of society. This is not unique as all racial groups are faced with similar problems and solve them by development of organizations (schools, churches etc.) that meet their needs. This creates a diverse society and protects the groups from losing their identity. Private schools with special interest are regarded as part of our society. We feel Indian people fit into this category and feel the political nature of Indians makes it impossible for complete separation of tribal politics from schools or other tribal goals and needs. The council itself is governed by general tribal council, the people, who charter the business council, elects them and dictates to them voting powers, similar to the constitutional arrangements of the U.S. where school policies.. are developed as</p>
			<p>May 13, 1980 Yes. In regard to the governing board, your presentation would be strengthened if you would include a letter from an attorney which state that existing written documents insure that the Board of Directors has sufficient autonomy to enable it to actually govern school, is not identical with the Council, and is not subject to political (tribal) pressures.</p>

wishes of the people are elected according to their views. The board does have the authority to govern the school but as with our own education systems listens to the people to develop the educational system which they desire. This is especially true of a community college designed to meet the needs of the community. In this way the school will meet those needs and be in close contact with the people. In order for extensive changes to occur the charter would have to be changed which would require approval of the council as recommended by the Board of Trustees. Adequate safeguards appear to be in place to prevent manipulation of the school. Your theoretical administrative standard for all schools are subject to pressures of funding politics. whether internal or external. and institutes can even be dissolved by legislative action. We feel the tribal structure is no different than the structure which exists in the state of education system in these respects. Members of Board of Trustees are from all facets of life and are intended to represent the community.

47	1980 June Action on application for candidate for accreditation deferred until December. with preliminary visit.	YES	Yes
48	1980 Fall Preliminary visit conducted. 1980 Dec. Approved as candidate for accreditation.	YES	Yes
49	1982 Biennial report and visit.	YES	Yes
50	1982 June Show cause why candidate for accreditation should not be discontinued. No response to show cause order. Accreditation discontinued (allowed to lapse). 1983 June Recognition as candidate for accreditation discontinued.	NO	
Stage 1			
51	1986 Spring Application for consideration submitted. 1986 June Application for consideration deferred--request for	YES	Yes. The concerns at this time are with the audit, establishing goals and objectives for instructional program and

additional information

intellectual freedom and independence

51

1986 Dec. Deferred action. requested preliminary visit.

1987 June Application for consideration accepted. Okay given to proceed with self-study and site visit planning.

April 1987 "Specifically how does the commission determine that 'sufficient intellectual freedom and independence' exist."

YES

The intention and importance of the requirement is to ensure that an institution's governing board has the independence and authority to carry out its responsibilities. Although a governing board obviously must work in harmony with state legislature and state laws, the governing board must have the authority to carry out the institution's mission without interference or inappropriate intrusion by legislators and other state officials. The Commission would be greatly troubled, for example, if an individual legislator attempted inappropriately to influence matters that are the responsibility of the governing board, such as decisions pertaining to personnel or the curricula. The Commission would expect the same autonomy for the governing board of the Northwest Indian College in that it should be free of interference by others in its work of carrying out the mission of the College.

Stage 2

53

1988 Site visit based on self-study for candidate for accreditation.

1988 June Approved as candidate for accreditation.

Stage 3

54

1990 Biennial report and site visit.

1990 June Biennial report accepted and candidacy reaffirmed

YES

Yes. The council approved a revised charter for the college. The visiting team found the charter quite "regulatory" in nature and recommends that more operational procedures, necessary to adequately manage a college, be turned over to the college enterprise.

55

1992 Biennial report and site visit.

1992 June Biennial report accepted and candidacy reaffirmed. Okay given to proceed with self study and site visit.

YES

Yes. Continued concern with the regulatory nature of the charter. Suggested changes.

Response to suggested changes. Can the college be operated as department of the Council?

YES Yes. The Commission must be satisfied that the board is responsible for the institution and that its authority is not contravened by the state or tribal government. It is our conclusion that the college could not be governed by the Council and continue to meet the Eligibility requirements.

Submission of charter revisions. The council agrees that the charter contains operational details that are both unusual and unnecessary. But, some things are very important. The council is concerned that "tribal rights not be determined in litigation to which it is not a party or to which it has not given its consent. Therefore the charter would prevent the board from engaging in litigation without specific authorization of the Council. The Council wants to retain veto power over the selection of the president since the president is an important figure on the reservation. The council must be able to act if the candidate is unacceptable to the broader reservation community. If the college should cease to exist the Council wants it understood how the assets are to be distributed. Finally, the council wants to add the provision, borrowed from another tribal college charter that states: The Tribal Council shall, at all times, have the power to prescribe such regulations, provisions and limitations as it may deem advisable, which regulations, provisions and limitations shall be binding upon any and all corporations subject to the provisions of Tribal law, and the Tribal Council shall have the power to amend, repeal or modify such laws at its pleasure."

YES

- | | | | |
|-----------|---|------------|--|
| 56 | <p>1993 Full scale site visit based on self-study.
 1993 Dec. Initial accreditation granted at AA level, with condition--- focused interim report and visit</p> <p>Stage 4</p> | YES | <p>No. The board has developed a good relationship with the Council, and have developed the understanding with the council that it should stay an arms length away from the administration of the College.</p> |
| 57 | <p>1995 Focused interim report and visit.
 1995 Dec. Accreditation reaffirmed based on report and visit</p> | YES | No. |
| 58 | <p>1996 Third year progress report submitted.</p> | YES | No. |

1996 Dec. Third year progress report accepted with condition--college must clearly document in fifth year self study compliance with recommendations from 1993.

Appendix I

College 6. Interaction Data

Actions #	Type of Action, by College	Available?	Response by Commission Were governing boards an issue?
Stage 1 & 2			
59	<p>1981 Aug. Application for consideration for candidacy submitted.</p> <p>1982 March Site visit based on self study.</p> <p>1982 June Not approved as candidate for accreditation.</p>	YES	<p>Yes. Problems/concerns were in all areas- finance, physical plant, library, educational program, instructional staff, student services and administration. Within the administration section the concern was with "the duties and responsibilities of the Board of Directors and its relationship to the Tribal Council need to be set forth in an official policy statement" and the stability of the administration with respect to the president.</p>
Stage 1			
60	<p>1985 June Accepted for consideration with conditions of preliminary visit and report.</p>	YES	<p>Yes. There were concerns in the area of facilities, student record preparation and maintenance, staff funding and membership of the Board of Directors and compliance with the requirement that voting members have no contractual, employment, or personal financial interest in the college.</p>
<p>Addendum to Application for Candidacy At the time that this section of the charter was written, it was felt by the administration and the Board that occasions might arise where the expertise of individual members of the board might be needed to perform a task for the college that was beyond the scope of their roles as Board member. In such case, the Board felt that they should have the power to provide fair compensation for such services, if needed through a contract arrangement. The major consideration for the change of this language was the use of board members as part-time instructors in their particular areas of expertise. The charter language basically allows the college to make use of expertise available locally that might not otherwise be available.</p>			
61	<p>1985 Oct. Preliminary visit and report accepted. College encouraged to proceed with self study and host on-site visit</p>	YES	<p>Yes. "The unique nature of the sovereignty of the Tribal Council, the appointment of the Board of Directors, and any possible conflicts-of-interest due to employment or financial interest has been addressed. All</p>

parties are constructively sensitive to the issue and appear to have safeguarded against such conflicts."

Stage 2

- 62** 1986 April Site visit based on self study for application for candidacy.
1986 June Approved as candidate for accreditation.

YES

No. Administrative concern with individual members of the administrative team performing to many functions. The continuity and consistent support by the Board of Directors is evident. The apparent excellent relationship between the college and Tribal Council has much to do with the leadership of both Boards.

Stage 3

- 63** 1988 May Biennial report and visit.
1988 June Report accepted with condition--submit a progress report by May 1, 1989.

YES

No. The audit is the main concern. "The evaluation committee noted an unusually supportive relationship existing between the board of Directors and the administration of the College. both the president and the dean of instruction serve on the Tribal Economics Development commission..."

- 64** 1990 March Biennial report and visit and progress report.
1990 June Candidacy reaffirmed. Okay given to proceed with self-study and visit planning.

YES

No.

- 65** 1991 Oct. Full scale site visit based on self study self study.
1991 Dec. Initial accreditation granted at associate degree level with conditions--focused interim report and visit.

X

No.

- 66** 1993 March Focused interim visit based on report.
1993 June Accreditation reaffirmed on basis of report and visit.

X

No.

Stage 4

- 67** 1994 Third year progress report submitted.
1994 June Third year progress report accepted.

X

No. The college is urged to pay particular attention to involvement of faculty, students and the board in the formation of institutional policies (eligibility requirement ") in preparation for the upcoming self-study and site visit.

- 68** 1996 Oct. Fifth year site visit based on self-study.
1996 Dec. Accreditation reaffirmed with condition--progress report fall 1998

X

No.

Appendix J

College 7. Interaction Data

Action #	Type of Action, by College	Available	Response by Commission Were governing boards an issue?
Stage 1			
69	<p>1986 March. Application for consideration submitted.</p> <p>1986 June Application for consideration accepted.</p>	YES	Yes. It is not apparent that the articles of incorporation and bylaws are in compliance with the requirement that board members have no "contractual, employment or personal interest in the institution"
Stage 2			
70	<p>1986 Oct. Site visit based on self study.</p> <p>1986 Dec. Decision deferred on recognition as candidate. (Gov. Board problem)</p> <p>1987 June Approved as candidate for accreditation.</p>	YES	<p>Yes. Although the college and its governing board have no experience to the contrary and believe that the governing board has full authority and independence, the evaluation team is unsure about the degree of independence should a challenging situation occur. A bylaw specifically provides that the chair of the Council, has authority to review and approve all actions of the governing board of the college. Although no contrary experience has been noted, there exists the real possibility that this proviso for veto power by the council chairperson could be implemented. If so, then the college board would not have final authority and its governing independence could be abrogated. As such, it is appropriate to question its full authority to govern the college and its ability to protect the college from undue political interference and pressures.</p> <p>The Commission encourages the two organizations to develop a written understanding, acceptable both, that would ensure the authority of the College's governing board to carry out the mission of the institution.</p>

The College was disappointed, of course, that the Commission on Colleges apparently interprets part of the charter in the most literal sense. As an institution established under the Tribally Controlled:

Community College Act of 1978, we will always be subject to the jurisdiction and tribal sovereignty of the Council.

Written tribal resolutions are the principal formal means of conducting tribal business. I worry that their "tribal sovereignty" or "tribal jurisdiction" is being threatened. Therefore, I hope that the enclosed resolution will be acceptable to the Commission.

Stage 3

- | | | | |
|-----------|--|------------|---|
| 71 | 1989 April Biennial report and site visit.
1989 June Biennial report accepted. | YES | Yes. The concern with the authority of the college board and could tend to reduce its intellectual independence was resolved by a Council resolution in which the authority of the Council was repealed and actions of the College Board of Directors would be final. |
| 72 | 1991 April Second biennial report and visit.
1991 June Biennial report accepted.
Okay given to proceed with self-study and site visit planning. | YES | No. |
| 73 | 1993 Spring Full scale site visit based on self study.
1993 June Initial accreditation granted at AA level, with conditions--interim report and visit in spring 1995. | YES | Yes. Concern with governing board training. |
| 74 | 1995 May Focused interim report and visit.
1995 June Accreditation reaffirmed. | YES | No. |

Stage 4

- | | | | |
|-----------|---|------------|-----|
| 75 | 1996 April Third year progress report submitted.
1996 June Third year progress report accepted | YES | No. |
|-----------|---|------------|-----|

Appendix K

College 8. Interaction Data

Action #	Type of Action, by College	Available?	Response by Commission Were governing boards an issue?
Stage 1			
7 6	1987 Oct. Application for consideration submitted 1987 Dec. Application for consideration not accepted.	YES	Yes. The governing board and intellectual freedom (eligibility requirements 2 & 3), library (eligibility requirements 16) and financial records (eligibility requirements 21) were concerns and deficiencies. The Commission suggests that an official indication the majority of the Board must not have no contractual employment, or personal financial interest in the institution.
7 7	1988 Oct. Resubmitted application for consideration. 1988 Dec. Application for consideration accepted and given okay to proceed with self-study and plan site visit.	YES	No. The business committee in order to demonstrate its faith and support of the College unanimously adopted a formal resolution in September, 1988 acknowledging all actions of the Board to be final in order to assure the degree of autonomy and independence required for accreditation by the Northwest Association of Schools and Colleges"
Stage 2			
7 8	1989 April. Site visit based on self-study. 1989 June. Approved as candidate for accreditation.	YES	No. General education requirements (eligibility requirements 10) and training for the financial aid director were concerns to be reported on in the progress report.
7 9	1990 Oct. Submitted progress report. 1990 Dec. Progress report accepted The governance system at College 8 is unique in that there is representation from all areas of the college community, administration, faculty, students, and community. There is very little empire building because the concept which governs all decision is always "What is best for the students and the college." The strength of its governance is the broad representation and student representation. The staff and faculty have brought qualities of leadership and experience in Native American education to the college. Although the	YES	No

governance system is as democratic as possible and results in decisions which have at least a majority of the supporters. It slow and time consuming. At times, the burden of another meeting seems excessive. Nevertheless, the staff and faculty are quick to point out that it is preferable to the alternative of having decisions made without their input and sometimes lengthy deliberation.

Stage 3

- | | | | |
|-----|---|-----|---|
| 8 0 | <p>1991 April. Biennial progress report and visit.</p> <p>1991 June. Biennial report accepted and candidacy reaffirmed. If college wants to proceed with self-study and full scale visit for initial accreditation in 1993 (two years "ahead of schedule") then must submit progress report in spring 1992.</p> | YES | <p>No. The concern was with stability of full time faculty and library staffing. The visiting team noted an unusually supportive relationship existing between the Board of directors and the administration of the College."</p> <p>"The President has ably served in her role since the college was established. She is an effective leader with strong campus and tribal support."</p> |
| 8 1 | <p>1992 Submitted progress report.</p> <p>1992 June. Report accepted and college approved to proceed with self-study and planning for full scale site visit.</p> | YES | No. |
| 8 2 | <p>1993 March-April. Full scale site visit based on self-study.</p> <p>1993 June. Initial accreditation at the associate degree level granted, with condition--focused interim report spring 1995.</p> | YES | <p>No. Sixteen general recommendations but none involved the governing board or intellectual freedom and independence.</p> <p>The College has experienced unusual stability of its administrative since the opening of its doors. This continues during the critical period of its establishment and development has proved to be a real asset in the College's steady and rapid growth. The team was deeply impressed with the vision and leadership capabilities and the administrative team.</p> <p>Off campus communication should also be emphasized. It needs to be emphasized that the College is rightfully contributing not only to increased knowledge and understanding, but also to the economic development of</p> |

			the Reservation and the surrounding area.
8 3	1995 May Focused interim report and visit. 1995 June Accreditation reaffirmed	YES	No.
	Stage 4		
8 4	1996 April Third year progress report submitted. 1996 June Third year progress report accepted	YES	No. Commission noted need for the college to be in compliance as soon as possible...with eligibility requirements, standards and policies...noted in previous Evaluation Committee Report.

Appendix L. Tribal Government Action Continuum

TRIBAL GOVERNMENT ACTIONS/RESPONSES/FORMS OF APPLYING PRESSURE

All tribal colleges have a similar relationship, through the charters and by-laws, with tribal governments. There is wide variation in the way the tribal government interacts with the tribal college. Actions vary along a continuum. Colleges may have experiences at different parts of the continuum different times.

No interference	Minimal Interference	Interference Under the Guise of Other Issues	Overt Interference
No documented interference (one occurrence).	Noted by Commission and resolved by charter changes (three occurrences).	<ul style="list-style-type: none"> Restructure and rejuvenate boards, commissions, and committees. Unify all tribal education programs especially in the areas of policy and procedures. Review and realign all tribal enterprises in terms of efficiency and cost effectiveness Foster consistency among all tribal "sub-committees". <p>(one occurrence for each)</p>	<ul style="list-style-type: none"> Tribal council attempts to remove President (two occurrences) Sitting governing board removed by tribal council while board is terminating president.
Events driven by leadership style of the president.	Events driven by Commission	Events characterized by political pressure, resolved by negotiation.	Events are personal and political. Resolved procedurally

Appendix M

College I--Charter, Articles of Incorporation and By-law Data

Type of Tribal Government - IRA

College Year of charter	Original 1975	Most Recent 1985
Membership Issues		
Number of Members	6	6
How selected	Recommendations for vacancies shall be made by the existing Board of Directors and the President of the College. The recommendation(s) shall then be forwarded to the Tribal Council President for final selection. This final selection shall then be concurred in by the Tribal Council before the designated person shall be on the Board of Directors. All permanent appointments shall be in the form of a Tribal Council resolution. Until the Tribal Council President gets concurrence of his selection to a vacant Board seat, he may make written temporary appointments.	Same.
Student	No student	Same.
Term	3 years no mention of staggered	1, 2 or 3 year terms
Eligibility Requirements	Tribal members, 18 years old	Same.
Tribal government-retained powers.	All actions of the corporation shall be subject to the review and approval by the Tribal Council President.	It is acknowledged by the Tribal Council that the College is an entity totally distinct and separate from the Tribe, Tribal Administrator and the Tribal Council. The Tribal Council chartered the organization and has a role in the selecting the Board of Directors, but beyond these functions, the Tribe recognizes the autonomy of the College.

Treasurer of Board is to render to the Chairman and to the Board whenever they may require accounts of all transactions as Treasurer and of the financial condition of the corporation.

Same.

No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in, or intervene, (including the publishing or distribution of statements) any political campaign on behalf of any candidate for public office.

Same

The By laws may amended or repealed by the Board as long as it is not inconsistent with Section 501 (c) (3) of the Internal Revenue Code of 1954, as amended.

Same.

The Articles may be amended by the Tribal Council except that no change shall be made of those actions required by Section 501 (c) (3) of the Internal Revenue Code of 1954, as amended.

Same.

Not employed by college provision?

Directors may not be full time or part time employees of the College

Appendix N

College 2 - Charter, Articles of Incorporation and By-laws, Tribal Resolution Data

Type of Tribal Government-Non-IRA

	Original	Most Recent Charter and By-laws
Year	Between 1974 & 1976	1996
Membership Questions		
Number of Members	8	6
How selected	Appointed by tribal council. Student who is serving as student body president. At least two of the members to be Tribal Council members.	Appointed by Tribal Council, from districts.
Term	"Regular" Board members serve 3 years. Tribal Council members serve for 2 years. Student serves for 1 year.	5 years, staggered, except student who serves for 1 year. Limited to two consecutive terms.
Student	Yes, voting	Yes, non-voting
Eligibility Requirements	Member of tribe. Two members must be Tribal Council members. One member is student and is usually the President of Student Body.	Tribal member, 18 years old from a district. Members must live in the district they represent. Members may serve only two consecutive terms.
Tribal government- retained power	By-laws amended by the Tribal Council and the Board. The Business Council has the authority to appoint and "fire" members of its various councils, including the College Board.	"This Charter may be jointly amended by a four-fifths(4/5) vote of the members of the Board of Trustees and approval of the Tribal Council." Pursuant to the Constitution, the business Council has the power to delegate to subordinate boards which are open to all members of the Tribe any power enumerated in the constitution, reserving the right to review any actions taken by virtue of such delegated powers. The Business Council is desirous of formally expressing the tribal intent that the College leave and retain an autonomous relationship with the Tribal Government when in the duly appointed

Board shall have the duty and responsibility to set policies and procedures for the College and otherwise give direction to the College as an academic institution.

The Business Council hereby recognizes and acknowledges the autonomous relationship between the Business Council, the Tribal Government, and the College.

The Business Council further recognizes and acknowledges the need for strict compliance with the policies and procedures set by the Board and the Business Council formally agrees that the Tribal Government shall not interfere in any way whatsoever with the operations and activities of the College.

The College is to provide the Tribal Council, on a quarterly basis, a formal report by the Chair of the Board of Trustees, including but not limited to, information pertaining to enrollment, new programs and financial information

Yes

Not employed by college provision in charter

"Members of the Board shall not serve as full-time or part-time employees of the College."

Appendix O

College 3 - Charter, Articles of Incorporation and By Laws Data

Type of Tribal Government Non-IRA

Year of charter & by-laws	1980 to 1984	1989	1993
Number of Members How selected	1-2 Each member selected by the Education Commission from the District he/she lives in. The Commission is made up of any person who is active in education on the reservation. Also included in this group are the executive officers of the tribe, advocates of education and representatives of Montana college students.	1-2 Nine members shall be elected by the members of the Commission from each of the various districts. Two members to be elected from each of the three more populated districts. One member is to be elected from each of the three less populated districts. The College Board of Trustees and the Commission Board of Directors are now completely separate.	1-4 Twelve members elected (elections called for by the President and Tribal Secretary): two each from six districts. (No longer districts through the Commissions or the more populated less populated distinction). One appointee from the Tribal Chairman's office and one from the college faculty/staff.
Term	1 A person could be both a member of the College Board of Trustees and Commission Board of Directors.	1 or 2 years	2 years, staggered
Student	1 student, voting	Same.	No longer on board.
Eligibility Requirements	All of whom shall be members of the Tribal Council (all enrolled members of the tribe are members of the Council)		

**Tribal government-
retained powers**

This charter may not be amended except by a majority vote of the Tribal Council with the approval of the Secretary of the Interior or his authorized representative

Same

Same

The tribal council has the power to repeal the charter

Same

Same

The Council has no power to review or reverse actions of the College Board

Same

Same

No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing and distribution of statements) and political campaign on behalf of any candidate for public office.

Same

Same

**Not employed by
college provision in
charter?**

Governing board members may be employed by the college and one was.

May be employed by College.

The trustees are not employed by the college, nor do they have contracts for services or any personal financial interest

Appendix P

College 4--Charter, Articles of Incorporation and By-Laws Data

Type of Tribal Government-IRA

	1977	1987
Number of Members	7	7
How selected	Tribal Council appoints.	Tribal Council appoints.
Term	4	4, may serve only two consecutive terms.
Student	No	No
Eligibility Requirements		Must be tribal member.
Tribal government-retained powers	<p>The Tribal Council shall at all times have power to prescribe such regulations, provisions and limitations as it may deem advisable, which regulations, provisions and limitations shall be binding upon any and all corporations subject to the provisions of this ordinance, and the Tribal Council shall have the power to amend, repeal or modify this ordinance at pleasure.</p> <p>Between January 1st and March 1st the corporation shall deliver to the Secretary of the Tribal Council an annual report of the previous program year. Report to include general state of college, budget, number of enrolled tribal members attending college and audits.</p> <p>No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing and distribution of statements) and political campaign on behalf of any candidate for public office.</p>	Same.

Appendix Q

College 5--Charter, Articles of Incorporation and By-laws Data

Type of Tribal Government - Non-IRA

	1980	1988	1992
Year of charter			
Number of Members	5	5	5
How selected	Appointed by the Business Council	Appointed by the Business Council	Appointed by the Business Council
Term	4 years, staggered	4 years, staggered	4 years, staggered
Student	No.	Same	Same
Eligibility Requirements	Each board member shall be a recognized member of the tribe and selected for his qualities of industry, responsibility, honesty, integrity and judgment. Members of the Council may also be members of the Board.	Each board member shall be a recognized member of a participating Indian tribe and shall be selected for his qualities of industry, responsibility, honesty, integrity and judgment. Members or employees of the Business Council may also be members of the Board, however this group may not constitute a majority of the membership.	Same
Tribal Government-retained powers	Director shall be required to make periodic reports to the Board and to the Business Council	President shall be required to make periodic reports to the Board and to the Business Council	The President shall be required to make monthly activity reports and financial reports to the Board and the Business Council.

<p>Prior approval of the Business Council is necessary for the College to borrow funds; enter into business contracts or litigation; utilize the professional advice of consultants or tribal lawyer retained by Business Council; enter into separate contracts for professional service; or execute leases</p>	<p>Same</p>	<p>Prior approval not needed</p>
<p>Board shall have authority to hire a Director. The Director selected is subject to the approval of the Business Council and the Secretary of the Interior or his authorized representative.</p>		<p>The Board of Trustees shall have the authority to hire a president, using a selection process which requires the advice of a broad based search committee, comprised of equal representation from the Board and Business Council plus a representative of the college administration, faculty, staff and students of the main campus. The search committee will submit a list of finalists (3-5 names) for review by the Business Council, which may veto any individual candidate. The remaining candidates (not less than 3) will be referred to the Board for interview and selections</p>
<p>The fifth member of the Board, who shall serve as Chairman of the Board, shall be elected by the Board each year in January. His term should be for as long as determined by the Council. In any case however, his election as Chairman of the Board may be terminated with or without cause on the annual anniversary of the establishment of the college by action of the Business Council</p>		<p>Renewed</p>

The Tribal Council shall, at all times, have power to prescribe such regulations, provisions and limitations as it may deem advisable, which regulations, provisions and limitations shall be binding upon any and all corporations subject to the provisions of Tribal law and the Tribal Council shall have the power to amend, repeal, or modify such laws at its pleasure.

A majority of Board members shall have not contractual, employment or financial interest in the College.

No mention.

No mention

Not employed by college provision in charter?

Appendix R

College 6--Charter, Articles of Incorporation, By-laws and Tribal Resolution Data

Type of Tribal Government - Non-IRA

Year of charter	Original 1978-1980	1982 & 1985	Most Recent 1988 & 1989
Number of Members	7	9	9
Student	1 student, ex officio	1 student, voting member	Same
How selected	6 members appointed by Tribal Executive Board. Student member is Student Body President.	8 members appointed by Tribal Executive Board.	Same
Term	2 years Staggered	Same	Same
Eligibility Requirements	Not more than 3 Board of Directors, also members of Tribal Executive Board. At least 5 members of Board must be members of the Tribe.	Same	Same

**Tribal government-
retained powers**

<p>Thirty days before the beginning of the next fiscal year, the Board of Directors will prepare budget to be delivered and explained to Tribal Executive Board before its adoption</p>	<p>Same</p>	<p>Same</p>
<p>At the end of each academic quarter, President will deliver written report of activities of the College including a quarterly financial statement</p>	<p>Same</p>	<p>Same</p>
<p>Minutes of board meetings to be available to Tribal Executive Board.</p>	<p>Same</p>	<p>Same</p>
<p>College to be audited annually and report sent to Tribal Executive Board. Executive Board may call for audit at any time.</p>	<p>Same</p>	<p>Same</p>
<p>Repeal or amendment of bylaws shall become effective upon adoption of a resolution (a) approved in writing by a two thirds majority vote of the Board of Directors at a meeting notice for that purpose, and (b) approved by a resolution of the Tribal Executive Board.</p>	<p>Same</p>	<p>Same</p>

**Not employed by college
provision in charter?**

<p>No director may be full time employees of the College but otherwise shall not be precluded from serving the College in any other capacity and receiving compensation therefore.</p>	<p>Same</p>	<p>Same</p>
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Appendix S

College 7--Charter, Articles of Incorporation and By Laws and Tribal Resolution Data

Type of Tribal Government - IRA

	Original	Most Recent	Proposed (as of December 1998, could find no evidence that the proposed changes were instituted) 1996
Year of charter	1983	1986 & 1987	
Number of Members	7	Same	Same
Student	1 student, voting	Same	1 student, voting or non-voting
How selected	Appointed by Community Council. Nominated by student government.	Same	Same
Term	3 years for members from geographical areas. Members who represent agencies serve as long as they hold that position (community Council member serves until next reorganization of Council. Student serves a one year term)	Same	
Eligibility Requirements	18 years old, residents of reservation, selected from groups	Same	Same
	1 from Community Council	Same	3 Board members shall be elected from each of the two tribes which make up the reservation
	1 from Education Committee	Same	Removed
	1 student nominated by Student Government	Same	Removed
			Student shall be elected by the Student body of the College and shall be a member as long as that individual is enrolled for classes and represents the students' interests.

<p>Each, from two geographical regions.</p>	<p>Same</p>	<p>Removed.</p>
<p>Non Indian area member nominated by College Board</p>	<p>Non Member of the Tribe.</p>	<p>Removed</p>
<p>Member who is Director of Tribal Education Department</p>	<p>Same</p>	<p>Removed.</p>
<p>All actions of the Corporation shall be subject to review and approval by the Council chairman</p>	<p>All actions of the Corporation shall be final (1987)</p>	<p>Same</p>
<p>The Council shall at all time have the power to prescribe such regulations, provisions and limitations, as it may deem appropriate.</p>	<p>Removed 1987</p>	<p>Same</p>
<p>No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing and distribution of statements) and political campaign on behalf of any candidate for public office</p>	<p>Same.</p>	<p>Same.</p>
<p>The Corporation Directors, officers or employees shall take no actions which violate the Article of Incorporation or the Tribal Code.</p>	<p>Same</p>	<p>Some</p>
<p>Annual report of corporation</p>	<p>Same.</p>	<p>Some.</p>
<p>Nothing here in contained shall be construed to preclude any Director from serving the Corporation in any other capacity and receiving compensation therefor.</p>	<p>The College Board of Directors consists of seven members, the majority of whom have no contractual employment or personal financial interest in the institution (1986)</p>	<p>Members of the Board cannot be employed by the College on a full time basis or where such position creates a conflict of interest between the Board and members as determined by the Board and approved by the Community Council</p>

Not employed by college provision in charter?

Appendix T

College 8--Charter, Articles of Incorporation, By laws and Tribal Resolution Data

Type of Tribal Government - IRA

Year of charter	Original 1984	Most Recent 1992
Number of Members	8 including student	9 (changed in 1989)
How selected	Appointed by the Tribal Business Committee	Appointed by the Tribal Business Committee Approved by College Board (but not followed)
Student	1 student, voting	Same
Term	2, 3 or 4 year term staggered, serving no more than two consecutive terms.	Same
Eligibility Requirements	Enrolled member of the tribe	Same
Tribal government-retained powers	The Tribal Council shall at all times have power to prescribe such regulations, provisions and limitations as it may deem appropriate.	The Business Committee hereby acknowledges all actions of the College board of Directors to be final, in order to assure the necessary level of autonomy and independence required for accreditation by the Northwest Association of Schools and Colleges
	No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing and distribution of statements) and political campaign on behalf of any candidate for public office.	Same
		The College, with upon request, provide technical assistance to any tribal organization. The assistance provided will be in all areas of the College's expertise. This action in no way obligates College operational funds.

No ordinance or other enactment of the Tribe with respect to the operation or disposition of Tribal property shall be applicable to the College in its operation pursuant to this ordinance unless the Council shall specifically so state.

The College shall submit a detailed annual report, signed by the Chairman of the Board to the Council showing information as the College or the Council shall deem pertinent.

The Tribal Council may remove the Tribal Council Representatives to the College Board members for just cause, with two-thirds vote of a legal quorum of the Council at any regular or special Tribal Council Meeting

A majority of the Board (shall) have no contractual employment or personal financial interest in the College.

Annual report, with current address, statement of the character of business, names and addresses of directors and officers of the corporation, statement of annual operating budget, statement of indicating the total number of Tribal members enrolled as full-time and part-time students and the total number of non-tribal full-time and part-time students.

A member of the Board of Directors or other policy making body may submit an application for a staff position providing he/she resigns from the Board upon accepting or being appointed to the position and does not take part in the selection process. The exception to this is for individuals employed as part-time faculty. These individuals will not take part in the selection or confirmation process and need not resign their board position

Not employed by college provision in charter?

Appendix U

Evaluation Committee Confidential Recommendation

Institution: _____

Date of Evaluation: _____

Type of Evaluation: Full-Scale _____ Regular Interim _____ Focused Interim _____

The committee's recommendation to the Commission on Colleges is (Please check action and fill in date; where a choice is indicated, circle it):

_____ Defer action until _____

_____ Grant Candidacy

_____ Continue Candidacy

_____ Deny Candidacy

_____ Grant Initial Accreditation

_____ Grant Initial Accreditation with a progress report/focused interim report in fall/spring 19____.
(New members are expected to submit a progress report in the third year.)

_____ Deny Accreditation

_____ Reaffirm Accreditation

_____ Reaffirm accreditation
with a progress report in fall/spring 19 ____ addressing general recommendation(s) # _____

_____ with a focused interim report and visit in fall/spring 19 ____ addressing general recommendation(s)

_____ Defer reaffirmation of accreditation
until additional information is provided by fall/spring 19 ____ regarding _____

_____ with a focused interim report and visit in fall/spring 19 ____ addressing general recommendation(s)

_____ Issue a Warning to correct deficiencies by _____

_____ Impose Probation until (specify date) _____

_____ Issue Show-Cause until (specify date) _____

_____ Remove: Warning Probation Show-Cause

_____ Terminate Accreditation

Signed _____, Chair, on behalf of the Evaluation Committee

Please summarize, on the reverse side or on a separate sheet, the major considerations that caused the evaluation committee to make the above recommendation(s), being sure that the concerns are included in, and supported by, the evaluation committee report.

Rissa McCullough Wabaunsee

ACADEMIC INFORMATION:

University of Washington. Seattle, Washington
Ed.D., 1998
Educational Leadership and Policy Studies

Seattle University, Seattle, Washington
M.A., 1994
Adult Development and Training

Oberlin College, Oberlin, Ohio
B.A., 1972
Major: History Minor: Sociology

Eastern Oregon State College, La Grande, Oregon
1988 Teacher Certification

Western Oregon State College, Monmouth, Oregon
1974 National Science Foundation Institute on Race Relations

Additional Coursework:

Computer Programming Certificate Program, Chemeketa Community College,
Salem, Oregon, 1982-1983

Graduate School of Education, The Ohio State University, Columbus, Ohio, 1979

Atkinson Graduate School of Administration, Willamette University,
Salem, Oregon, 1976-1977

Urban Semester, Chicago State University, Chicago, Illinois, Fall, 1971

Summer Term, Northwestern University, Chicago, Illinois, 1971

EXPERIENCE:

August, 1994-August, 1995

Graduate Research Assistant

Dr. Al Smith, Director, Center for the Study and Teaching of at Risk Students, University of
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I created and maintained a database that supported ongoing research in four school
districts in Washington. I proof read, typed, formatted and edited various journal
articles and evaluation reports.

June, 1992-July, 1993

Math Instructor/ Assistant to the Director of Instruction
Seattle Vocational Institute 315 22ND Avenue South, Seattle, WA 98144

As an instructor I developed curriculum and taught new courses in Applied Math, Critical Thinking and Problem Solving. As an assistant to the Director of Instruction I maintained and managed 20 station computer lab. I counseled students experiencing academic problems. In my role as manager of the testing program, I evaluated entrance tests for proper placement into programs. I developed and implemented curriculum changes in Business Computer Applications and Allied Health programs. Finally I chaired Adult Basic Education, English as a Second Language, and Workplace Basics faculty meetings.

July, 1990- June, 1991

Workplace Basics and GED Preparation Instructor,
Learning Center, Washington Institute of Applied Technology (now called Seattle Vocational Institute), 315 22ND Avenue South, Seattle, WA 98144

I taught basic math for the workplace and vocational training. I worked with students to develop educational goals and plans.

March, 1990- June, 1990

Adult Basic Education and GED Preparation Teacher,
Adult Indian Alcohol Recovery Program, Small Tribes of Western Washington, P.O. 578,
Sumner, WA 98390-0578

I taught basic skills in writing, literature, social studies, science and math as part of the GED preparation curriculum.

January, 1990-June, 1990

Substitute teacher, Issaquah School District. 565 N. W. Holly, Box 7003,
Issaquah, WA 98027-0700

I taught social studies and math classes at Liberty High School, Issaquah High School, Echo Glenn (including high security locked down classroom) and Tiger Mountain Alternative High School.

August, 1989-October, 1989

Education Program Coordinator
Snoqualmie Tribal Non-Profit Organization, 18525 Novelty Hill Road Redmond, WA 98052

I managed Job Training Partnership Act and King County Community Development Block Grants during a transitional period.

July, 1988-July, 1989

Adult Basic Education and GED Preparation Teacher
Snoqualmie Learning Center, 14740 NE. Street, Redmond, WA 98052

I taught basic skills, writing, literature, social studies, science and math as part of the GED preparation curriculum. I assisted Education Program Coordinator in writing grants.

March, 1988-June, 1988

Substitute Teacher
La Grande Public Schools, La Grande, OR

I substitute taught at Central Elementary School.

January, 1979-June, 1979

Temporary Research Assistant

Asbestos Hazard Research Project. Batelle Memorial Institute, Columbus, OH

I tested experimental asbestos evaluation instruments being developed for use by Public School Districts.

January, 1980-June, 1980

Weather Data Analyst

Council of Educational Facility Planners, International. Columbus, OH

I analyzed weather data to be used to determine building specifications for new construction.

September, 1976-January, 1977

Substitute Teacher

Chemawa Indian School. Salem, OR

I taught classes in all areas of the program.

September, 1973-June, 1975

Social Studies Teacher

Chemawa Indian School, Salem, OR

I taught courses in Modern Problems, College Preparation, Contemporary Indian Leaders and Indian History and Culture.

September, 1972-June, 1973

History and English Teacher

Chicago Indian Center Alternative High School, Chicago Public Schools, Chicago, IL

I taught courses in Indian History, Indian Literature, Developmental Reading and Health.

PERSONAL DATA:

Birthdate: August 9, 1950

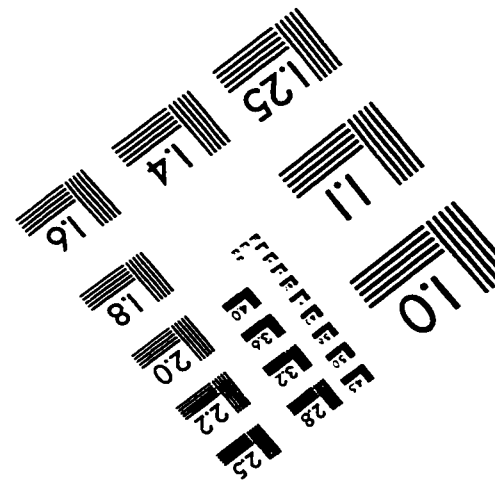
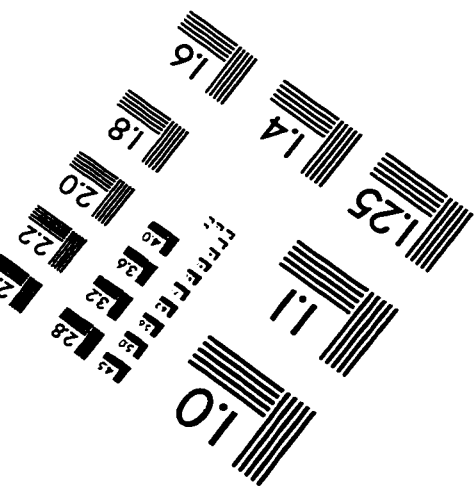
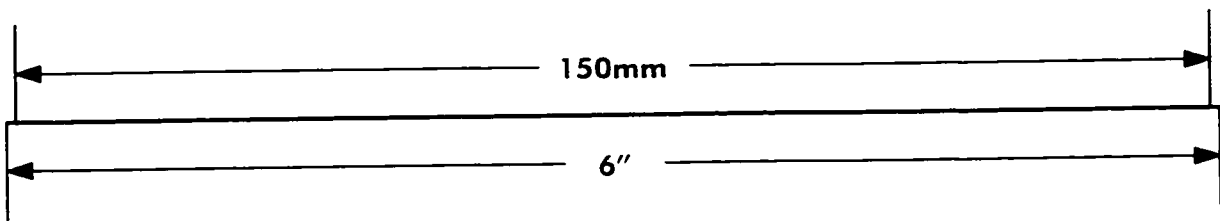
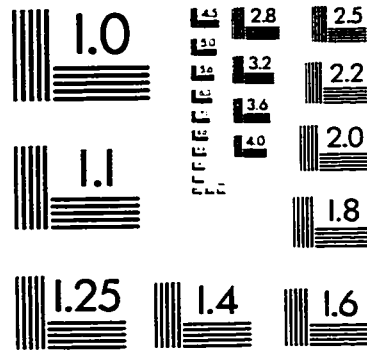
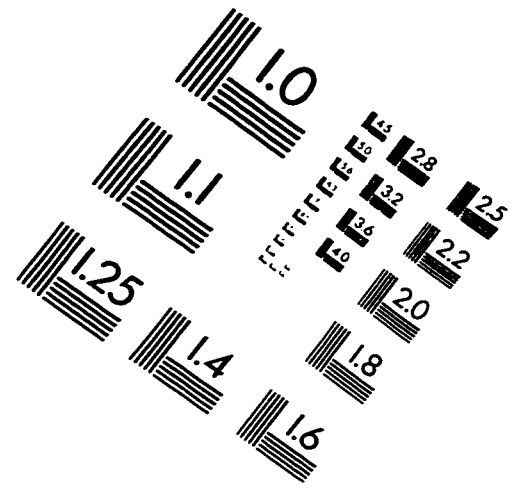
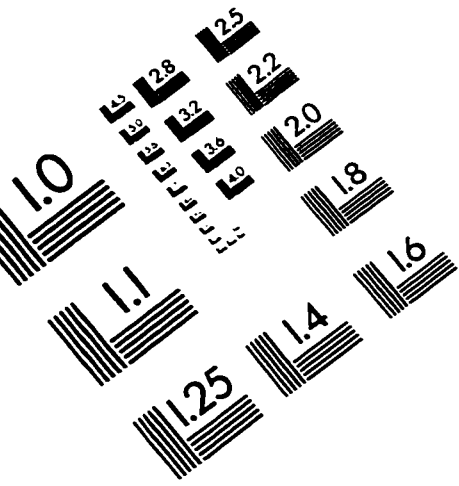
Place of Birth: Winner, South Dakota

Marital Status: Married, two children

Citizenship: US. Citizen

Tribal Membership: Prairie Band Potawatomi (Enrollment papers available through Horton Agency, Horton, Kansas)

IMAGE EVALUATION TEST TARGET (QA-3)



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