

# Distinctive and Connected

**Tribal Colleges and Universities and HLC Accreditation:  
Considerations for Peer Reviewers**

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## Introduction

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HLC is committed to promoting a solid understanding of the unique characteristics of Tribal Colleges and Universities (TCUs) and their contribution to higher education. The primary purpose of this paper is to provide those who serve as peer reviewers with considerations that may be helpful regarding the types of evidence to review to ascertain that TCUs are meeting HLC's Criteria for Accreditation.

As with any evaluation, the peer review team will need to determine whether the institution is aware of and can address any identified challenges; understanding the unique attributes of Tribal Colleges may assist the team in making these judgments.

TCUs accredited by HLC have met the requirements to obtain accreditation and work to maintain quality higher education. However, the challenge for the peer reviewer is in applying and interpreting HLC's requirements in the unique history, mission, culture, and circumstances of the TCUs.

# Part 1: Tribal Colleges and Universities Defined

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Since the beginning, Tribal Colleges and Universities have exemplified Native American tenacity of spirit (Pember, 2012). A combination of historical, economic, social, demographic, and educational forces has shaped the challenges and constraints that Native Americans face. Higher education has not always met the needs of Native American populations owing to their unique traditional, cultural, social, geographic, and economic issues, pedagogical approaches, and measures of success. More than a third of all Native American students are 30 years of age or older, which puts them at risk of dropping out prior to earning a degree. However, TCU students and their colleges contribute to the social health of reservation communities (Institute for Higher Education Policy, 2007).

Today, there are 37 Tribal Colleges and Universities serving more than 20,000 students throughout the United States. More than 75% of the TCUs hold candidate or accredited status with HLC. Since they were first founded, the number of Tribal Colleges has quadrupled and continues to grow; Indian student enrollments have risen by more than 370 percent (American Indian Higher Education Consortium, n.d.).

## Understanding the Context

- **Federal Definition** — Under federal law, a “Tribal college and/or university” is “an institution that qualifies for funding under the Tribally Controlled College or University Assistance Act of 1978 (TCU Act) (25 U.S.C. 1801 et seq.); Diné College, authorized in the Navajo Community College Assistance Act of 1978 (25 U.S.C. 640a note); or is cited in section 532 of the Equity in Educational Land-Grant Status Act of 1994 (7 U.S.C. 301 note). To qualify for funding under the TCU Act, an institution of higher education must: (1) be chartered by the governing body of a federally recognized Indian tribe or tribes; (2) have a governing board composed of a majority of Native Americans; (3) demonstrate adherence to stated goals, a philosophy, or a plan of operation which is directed to meeting the needs of Native Americans; (4) if in operation for more than one year, have students a majority of whom are Native American; and (5) be accredited, or have achieved candidacy status, by a nationally recognized accreditation agency or association. Thirty-five TCUs have been designated by the U.S. Congress as land-grant colleges through the Equity in Educational Land-Grant Status Act of 1994.”
- **Balance of Multiple Roles** — Collectively called “Tribal Colleges and Universities (TCUs)”, the TCUs manage several roles for their tribe, community, and constituents. Essentially, they must cultivate a practical marriage between their role as institutions of higher education and good stewards of their Native culture.
- **Elements of TCUs** — Although TCUs are similar in nature, they vary in their stages of development and differ in their structures, sizes, and other characteristics.
  - Per American Indian Higher Education Consortium (AIHEC) 2024, the average age of TCUs is 43.97 years. This includes Haskell Indian Nations University, the oldest TCU, established in 1884, although not designated a TCU until 1984. In 1884 Haskell Indian Nations University was originally established as a residential boarding school for Native American children. The newest TCUs are California Indian Nations College and San Carlos Apache College, both established in 2017; as of November 2024, both are working towards full AHIEC membership and institutional accreditation. The youngest full member of AHIEC and accredited TCU is College of Muscogee Nations, established in 2004.
  - Most have relatively small student bodies that are predominantly Native American. According to AHIEC 2024, the average fall 2023 student enrollment among all the TCUs was 509.34, with the largest enrollment of 1,834 and the smallest of 103.
  - The majority have open admissions policies in which they serve Native Americans and non-Native Americans. According to AIHEC 2024, the fall 2023 average enrollment for non-Native

Americans was 67 students. The highest was 353, followed by 351. Three institutions had zero non-Native Americans enrolled.

- TCUs have a high number of students that attend part-time. AIHEC fall 2023 data indicated that the average for part-time students was 48% of the overall enrollment, with the high of 82% and the low of 7%.
- Most are located on remote reservations with limited access to other colleges, meaning they are located approximately 100+ miles from an urban area. Their rural isolation also compounds their limited access to other resources and services.
- Most are chartered by one or more tribes, but they maintain their distance from Tribal governments. The exceptions are Haskell Indian Nations University and Southwestern Indian Polytechnic Institute, which are federally chartered and are operated by the Bureau of Indian Affairs, along with The Institute of American Indian Arts, which is governed by a board of trustees appointed by the U.S. president.
- TCUs typically offer lower-cost tuition. The average cost of tuition and fees in 2021-2022 at a TCU was \$3,744, according to AIHEC. In addition, several TCUs do not charge tuition, such as Haskell Indian Nations University in Kansas and Southwestern Indian Polytechnic Institute in New Mexico – two TCUs that only Native students can attend. Some offer tuition discounts.
- All TCUs began as two-year institutions (American Indian Higher Education Consortium, 1999). In 2024, out of the 35 accredited TCUs 25 offer certificates, all 35 offer Associate degrees, 22 offer Bachelor's degrees, nine offer Master's degrees, and one recently added a PhD degree (IPEDs, fall 2024).
- Thirty-one of the 35 accredited TCUs offer dual credit courses for high school students (IPEDs, fall 2024)
- **Role of TCUs** — Often located in the poorest communities in the nation, the TCUs serve first-generation students who juggle their studies with their family and financial responsibilities. TCUs strive to combine the best of two worlds - Tribal and Western - for their students. Maintaining a healthy balance is critical to their success. They want to develop Indigenous students who can serve both Tribal and non-Tribal communities with new skills and abilities. They employ various strategies including work with elders on new initiatives, develop new relationships between Indians and non-Indians, expand strategic partnerships between Indian and non-Indian organizations, and create a curriculum that meets academic standards and includes rich Indigenous content (Bowman, 2009).
- **Vision of TCUs** — The TCU presidents say it is essential for them and their colleges to understand the local communities and their traditions. Community knowledge includes political, social, and family practices; traditional knowledge includes the ancient cultural and linguistic foundations of contemporary, traditional Tribal people (Bowman, 2009).
- **Mission of TCUs** — TCU mission involves the following:
  - Tribal colleges establish a learning environment that supports students who have come to view failure as the norm in any non-indigenous educational system.
  - Tribal colleges celebrate and help sustain Native American traditions.
  - Tribal colleges provide holistic services that enrich surrounding communities.
  - Tribal colleges have become centers for research and scholarship that directly benefit their communities and tribes' economic, legal, and environmental interests (Stein, 2001).

The mission of TCUs continues to focus on the **economic, cultural, and spiritual survival** of Native communities. According to the **American Indian College Fund** and the **American Indian Higher Education Consortium (AIHEC)**, TCUs are instrumental in creating pathways for Native American students to attain higher education while also reinforcing cultural and community values.

- **Culture and Traditions** — Certain classes may be taught by Tribal elders and other non-traditional faculty members. Faculty have developed innovative curricula and teaching methodologies, and the colleges have become centers of Native American research and scholarship. Tribal Colleges also work to instill an appreciation of Tribal culture in non-Indian faculty members through required professional development and cultural awareness programs. Moreover, the colleges have become essential repositories of Tribal knowledge. In many of these cases, the libraries function as Tribal archives. They collect documents and records and record oral histories from Tribal elders (American Indian Higher Education Consortium, 1999).
- **Role of the Elders** — The Native American educational approaches are rooted in Tribal knowledge and are derived from the teachings of their ancestors. Courage, wisdom, generosity, and industriousness are all teachings that the Tribal elders have passed on to the Tribal educators. TCUs are responsible for teaching their people about their relationship with the land, to be a Good Ancestor, and to be dedicated to the self-determination of Indian people and the sovereignty of Native nations (Crazy Bull, 2012). The role of the TCUs and their elders demonstrates a shared commitment to and respect for oral tradition as a critical resource.

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- **Community Programs and Services to the Tribe** — More than 46,000 community members rely upon TCU services, which include libraries, job training and health programs, and Head Start and youth programs (Paskus, 2012).
- **Additional Challenges and Opportunities** — Leaders within the Tribal College movement have a wide range of concerns for the future:
  - Changes in Native populations;
  - Maintaining and growing ties with culture, language, and traditional values;
  - Keeping up with technology;
  - Protecting and managing natural resources;
  - Encouraging entrepreneurship;
  - Finding a proper niche in higher education; and
  - Instilling passion within students and future Tribal College leaders (Pember, 2012).
- **Institutional Accreditation** — Institutional accreditation is a top federal priority; it is required for colleges and universities to be eligible for federal resources, as well as for voting membership in the American Indian Higher Education Consortium (AIHEC).
- **State Authorization** — Pertaining to institutional accreditation, TCUs are eligible to pursue and hold accreditation membership by nature of the recognition of their Tribal sovereignty. TCUs work with their state for NC-SARA certification for offering of distance education courses and programs.
- **Specialized Accreditations** – TCUs may hold specialized accreditation for certain programs such as education, nursing, and social work.

If a TCU is federally authorized and/or supported, these institutions may have different reporting and approval requirements for such things as state authorization and distance learning.

# Part 2: Federal Legislation and Tribal Commitment—Governance

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The relationship between the Tribal College and federal agencies will likely be new to peer reviewers. So, too, is the structure within the tribe and the relationship between the Tribal government and the governing and administrative structures of the college.

## Understanding the Context

- **Role of the Tribe and Its Charter** — There are 574 federally recognized Indian tribes in the United States (Congressional Research, 2024). Each Tribal nation has a unique political relationship with the federal government based on binding treaties signed by Tribal leaders and U.S. government officials in the 1800s. Regarding self-governance, Tribal nations are comparable to individual states and sovereign nations. Each Tribal government is responsible for preserving and protecting its citizens' rights and maintaining the social and physical infrastructure necessary for their well-being.

Although Tribal governments have the right to levy taxes, few do so because of the extreme poverty on their reservations. Most Tribal governments provide police protection, social services, economic development, and educational services. If a tribe cannot offer these services directly, the Bureau of Indian Affairs is ultimately responsible for providing these services through the federal government's treaty obligation. In exercising their rights as sovereign governments, tribes with the resources have established TCUs to provide their Tribal members access to postsecondary education opportunities founded on Tribal values, culture, and language.

- **Role of the Tribal Council** — Tribal Councils need to ensure that chartering mechanisms minimize political interference. The councils have a right to require regular reports and audits and should review accreditation reports. Tribal Councils also need to have processes in place so they do not become a sounding board for employee complaints, which is the responsibility of the college board of trustees via sound institutional policies.
- **Role of the College Board of Trustees** — The selection of the college trustees varies with each tribe. The Tribal Council members may seek applications and select the members, or they may opt to have an election process on the reservation held by each district or clan. The selection process is designated by the tribe at the time the tribe approves the college's charter. Many times, the Tribal Council will require that a Council member be a voting or ad hoc member of the College Board. The charter may also require regular reporting from the college to the Tribal Council to keep the Council apprised of the college's successes and challenges. The College Board is responsible for ensuring that the Tribal Council's role is appropriate and that the board maintains the decision-making responsibility and authority for the college.

A delicate balance must be maintained among the tribe, the politics within the community and on the reservation, the college and its board of trustees, and all other agencies. Indicators that this balance is being maintained successfully include the following: the college board retains its autonomy in the governance of the Tribal College; the board is responsible for policy, strategic planning, and oversight; the board holds full responsibility for the oversight of the college, development of policy, and the selection of the chief executive of the college; board members are trained and made aware of the institution's unique circumstances and needs; the board has a clear set of operating policies and procedures to help guide it; there is effective decision-making that is based on individuals and groups functioning within their designated roles and areas of responsibility. In addition, the Tribal College board may have a statement of ethics based on expressed Tribal values.

- **College Leadership** — One of the most critical, and often the most challenging, responsibilities for a board is selecting the college's president. Hiring preference to a member of their tribe or another Native American has been essential to ensure an understanding of the unique role of the college in

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the community and the importance of the preservation and integration of their culture and traditions, history, and language into the college's programs and curriculum (Archambault & Allen, 2002).

The relationships of boards to administration and the relationship of outside political entities such as the Tribal Councils, community members, and organizations may impact effective college leadership. In addition, inconsistencies may exist in the roles of the senior academic, fiscal, and student services areas, and the college should have processes in place to address such inconsistencies. Evidence of processes to address these issues include a selection process for qualified personnel to ensure consistency and academic quality in college programming and services, job descriptions, hiring practices, and transition planning to support the institution's mission and unique characteristics.

## Part 3: Other Resources

- **American Indian Higher Education Consortium (AIHEC)** - While TCUs and their students face many complex challenges, it is important to note that they represent an important resource to each other. While not constituting one system, as with state-controlled university systems, collectively, the TCUs compose the American Indian Higher Education Consortium (AIHEC). At the national policy level, AIHEC is similar to the American Association of Community Colleges (AACC); however, it differs because it is a member-based organization created, chartered, and governed directly by each accredited TCU in the country. Through AIHEC, the TCUs are able to have a seat at the table in national policy and resource allocation discussions, and most importantly, they can share strategies and best practices in addressing the higher education needs of their students and the communities they serve (His Horse is Thunder, 2012).
- **Role of AIHEC** — The American Indian Higher Education Consortium (AIHEC) is the collective spirit and unifying voice of the nation's Tribal Colleges and Universities (TCUs). AIHEC provides leadership and influences public policy on American Indian higher education issues through advocacy, research, and program initiatives; promotes and strengthens Indigenous languages, cultures, communities, and Tribal nations; and, through its unique position, serves member institutions and emerging TCUs.
- **Membership** - AIHEC has grown to 37 Tribal Colleges and Universities (TCUs) with more than 75 sites in the United States and one in Canada. Each of these institutions was created and chartered by its own Tribal government for a specific purpose: to provide higher education opportunities to Native Americans through locally and culturally based, holistic, and supportive programs. TCUs have become increasingly crucial to educational opportunities for Native American students. They are unique institutions that combine personal attention with cultural relevance to encourage Native Americans—especially those living on reservations—to overcome their barriers to higher education (American Indian Higher Education Consortium, n.d.).
- **Bureau of Indian Education (BIE)** — As stated in Title 25 CFR Part 32.3, BIE's mission is to provide quality education opportunities from early childhood through life, in accordance with a tribe's

needs for cultural and economic well-being, in keeping with the vast diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities. Further, the BIE manifests consideration of the whole person by considering the individual's spiritual, mental, physical, and cultural aspects within his or her family and Tribal or village context. It provides services directly or through contracts, grants, or compacts to 574 federally recognized tribes, with a combined service population of approximately 1.9 million Native Americans and Alaska Natives.

The BIE also serves Native American and Alaska Native post-secondary students through higher education scholarships and support funding for Tribal Colleges and Universities. The BIE directly operates two post-secondary institutions: the Haskell Indian Nations University (HINU) in Lawrence, Kansas, and the Southwestern Indian Polytechnic Institute (SIPI) in Albuquerque, New Mexico.

AIHEC works with the BIE to sustain and increase funding for its member institutions funded under the Tribally Controlled Colleges and Universities Assistance Act of 1978 and other relevant legislation and to identify new funding sources throughout the federal government to advance the collective mission of its member institutions (U.S. Department of the Interior, n.d.).

- **American Indian College Fund**– The American Indian College Fund (the College Fund), a national 501(c)(3) nonprofit, was established in 1989. The purpose of the College Fund is to provide scholarships and programming for Native American and Alaska Native (AIAN) students to access and succeed in higher education. The College Fund also support TCUs with funding, training, and programs. (American Indian College Fund, n.d.)
- **White House Executive Order on Tribal Colleges and Universities (No. 13021)** — Given the Tribal Colleges' chronic underfunding, the first White House Executive Order on Tribal Colleges and Universities (No. 13021) was signed to integrate the colleges into federal programs fully. This document, issued by President Clinton on October 19, 1996, reaffirms the vital role Tribal Colleges play in reservation development by directing all federal departments and agencies to increase their support to the colleges. The initiative hopes to direct more attention toward the colleges, bring in more resources, and create more significant opportunities (AIHEC, 1999). President Bush signed a second order on July 3, 2002 (No.13270), "Improving American Indian and Alaska Native Educational Opportunities and Strengthening Tribal Colleges and Universities." On December 2, 2011, President Obama signed the third Executive Order (No. 13592), which, unlike the previous administrations, incorporates all levels of Native American education into a single executive order.

Under the first term for President Trump, the focus on Tribal Colleges continued, but there was less emphasis on new executive orders specifically aimed at Native education. However, several notable actions included the following:

- Continuing funding support for TCUs: The Trump administration provided funding through various appropriations to support TCUs, although the level of support was inconsistent and often contingent on broader federal budgetary negotiations.
- Supporting Native American Employment and Training: The Trump administration continued to fund workforce training programs for Native communities, which included TCU graduates.
- In 2020, President Trump signed an Executive Order (EO 13928) on "Combating Race and Sex Stereotyping," which impacted diversity training in federal agencies, but this did not directly address Tribal Colleges in the way that the Obama-era executive orders did.

Under the Biden administration there has been support for Indigenous Education Reforms: This included the following:

- Improving broadband access on reservations, which is critical for online education.
- Support for Native language revitalization, which can affect curriculum at TCUs.
- Strengthening the American Indian and Alaska Native Education program to increase opportunities for students at TCUs and other institutions.

## Part 4: Financial Resources

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Flexibility and adaptability are exceptional strengths of the Tribal Colleges and their tribes. They are challenged to address a broad range of financial demands. Their Tribal governments must juggle the myriad monetary demands that go beyond the needs of the college. Moreover, every tribe has a different portfolio of financial, physical, and human resources to leverage. As a result, TCUs must be flexible and adept at leveraging a wide range of resources to support their institution.

TCUs are funded very differently from most private or public higher education institutions. Understanding this support structure and determining its adequacy are essential for the peer reviewers. Securing reliable and consistent funding continues to lead the list of challenges for Tribal Colleges and Universities and remains their primary focus. Most Tribal Colleges rely highly on competitive and formula-based grant resources at the federal level and from private foundations. These resources help them survive, yet they create a significant demand for human resources, including program administration and fiscal management. The award of a significant grant is not an extra resource at TCUs but is part of the “bread and butter” of the institutions.

### Understanding the Context

As a result of the lack of local or state support, Tribal Colleges rely heavily on federal funds for their core operational funding. In particular, their operating expenses rely on the funds distributed by the Bureau of Indian Education (BIE).

**Federal Legislation** — In 1978, the U.S. Congress enacted the Tribally Controlled Community College Assistance Act (P.L. 95-471) (TCCUAA), legislation that would provide a base of operating funding for these institutions.

The Act authorizes funding through several sections:

- **Title I** currently allocates funding to 29 of the colleges through a formula based on the number of Indian students enrolled (called the Indian Student Count or ISC). No funds are distributed for non-Indian students, who comprise a significant percentage of total enrollment at Title I schools on average. The amount of the legislative action was \$8,000 per ISC, as adjusted annually for inflation, and shall not exceed an amount equal to the total cost of the education program provided by the applicable tribally controlled college or university.
- **Additional TCUs with Separate Federal Funding** — Three other TCUs are funded under separate authorities within Interior Appropriations, namely Haskell Indian Nations University, Southwestern Indian Polytechnic Institute, and the Institute of American and Alaska Native Culture and Arts Development. It should also be noted that since they are federally funded by the BIE, they are managed differently from Tribally chartered colleges.
- **Title II** provides funding for core operations for Diné College.
- In addition, funds are authorized through the BIE for **Facilities Renovation and Technical Assistance**.

**Note:** Seeking and maintaining federal funding continues to challenge all TCUs. Their staff and infrastructure are usually relatively small, and everyone wears several hats. The development of grant proposals is rarely that of an individual but the responsibility of many. It would be the exception if a TCU had a grants department or someone solely assigned to seek funding.

- **State Contributions** – Due to the federal government to tribal government relationships, states are under no obligation to fund TCU operations. There are occasions in which states do provide some funding to TCUs. For example, North Dakota provides funding to the TCUs in their state for non-Native students that are degree seeking students. In addition, Minnesota TCUs have received a Tribal College Supplemental Grant Assistance Operations and Maintenance Funding grant from their state.



*The majority of TCU funding is from variable sources.*

- **Tribal Contributions** — Some Tribal governments provide annual support to the TCUs. The amounts vary widely, depending on the resources and wealth of the tribe. The tribes also contribute significant in-kind resources including legal, financial management, human resources management, and facilities management. These in-kind services help the colleges provide the necessary range of services and support on very limited budgets. The tribes may also contribute support through shared facilities.
- **Community Contributions** — Some TCUs located in or near non-Tribal communities may receive support from those communities. That may range from no support at all to provision of such resources as facilities, community library access, accommodations for research/internships, and support in marketing. Support may depend upon the link between the tribe and the non-Tribal community or the existence of other higher education institutions within the non-Tribal community. The support is not expected, but it can contribute additional resources if available.
- **Land Grant Status** — TCUs benefit from 1994 federal legislation, Equity in Educational Land Grant Status Act (Pub. Law 103-382), awarding them land-grant status. They join 55 state universities and 17 Historically Black Colleges and Universities (HBCUs), which were designated as land-grant institutions in the 19th century. This designation helps the Tribal Colleges become more visible and connected to mainstream institutions by sharing projects, resources, and information with other land-grant colleges. With Land Grant Status, the Extension Services provided by TCUs are very important to the Tribal community. Professional development and student research opportunities are valuable components of this status.
- **U.S. Department of Agriculture** — This department also awards rural development grants to colleges to strengthen aspects of the agricultural programs and make them “Centers of Excellence” in the nationwide rural development network. These resources assist the colleges in maintaining their commitment to respect for the environment and sustainability.
- **Title III-A and V under the Higher Education Act** — Some Tribal Colleges—like other minority-serving institutions—receive funding from Title III under the Higher Education Act, including the Aid for Institutional Development program, TRIO, and Pell Grants.
- **Perkins Career and Technical Education Programs** — These programs include the Tribally-Controlled Postsecondary Career and Technical Institutions, the Native American Career and Technical Education Program (NACTEP), and the American Indian Adult and Basic Education (Office of Vocational and Adult Education). This funding is essential for developing technical courses, programs, and professional development.
- **Other sources of grant funding** – TCUs receive support in the form of grants from the National Science Foundation, Department of Health & Human Services, Department of Labor, Department of Energy, and National Endowment for the Humanities, to name a few.

**Notes:**

- The use of a wide range of grant funds is a much higher percentage of their total operating budget than is typically found in other higher education institutions. While this has been occurring for years and is not desirable, TCUs continue to work to become more self-sustaining.
- TCUs are financially supported and monitored by federal agencies and private foundations and must meet their requirements. In addition, the TCUs must also meet the expectations of the Tribal governments that charter them and help support them (Bowman, 2009).

# Part 5: College Curriculum, Programs, and Services to Students

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TCUs play a vital role in the Tribal community, creating educational opportunities, preserving culture and tradition, and providing valuable programs and services. As of 2022, the poverty rate for American Indians and Alaska Natives (AI/AN) is estimated at 25.4%, according to the U.S. Census Bureau's American Community Survey. This is significantly higher than the national poverty rate of 11.6% for the general population. On reservations, poverty rates can be even higher, with estimates often exceeding 30-40% in certain rural areas.

The American Indian and Alaska Native population continues to be among the youngest in the U.S. According to the 2020 Census, approximately 26% of AI/AN individuals are under the age of 18. TCUs continue to serve a large portion of Native students, with more than 60% of first-time entering students being between the ages of 16-24. This age range aligns with the growing need for accessible higher education among younger Native Americans. The American Indian College Fund reports that enrollment at Tribal Colleges has been steadily increasing in recent years, and enrollment growth has been recorded at 11% over the past decade.

The increase in full-time college enrollment among Native Americans continued into the 2020s. According to National Center for Education Statistics) TCU enrollment have been rising as a pathway out of poverty.

Tribal College Journal editor Marjane Ambler noted, "Tribal colleges and universities understand the value of two worldviews; they serve students ... who seek respect for and a deeper knowledge of Tribal traditions. They also serve students who know little about their tribes' language, spiritual beliefs, scientific knowledge, or leadership traditions." (Wheeler, 2004)

The Native American spirit is so connected to the tribe and the land that they could not survive any other way. As they face these issues together, they will also find strength together. Their greatest strength comes through education. In a Tribal community, the knowledge of one quickly becomes the knowledge of many. On this scale, education becomes exponentially powerful. It can reverse generations of health and social problems. It can create jobs. It can revitalize a language. Even though students at TCUs pursue vastly different subjects, they unanimously share the same hope for a better life, a better home, and a better future for their tribe (American Indian College Fund, 2013).

## Understanding the Context

- **Academic Programs** — TCUs are open admissions institutions, and many students who come to the college are underprepared. As a result, colleges invest significant energy in meeting the needs of these students and developing programs focused on developmental education. TCUs also offer certificate, associate, baccalaureate, and graduate programs. Their programs include various academic programs, a general education core, and vital occupational programs in technology, education, business, and natural resources.

The COVID 19 pandemic required TCUs to pivot from face-to-face course offerings to distance education courses and/or programs. TCUs have taken advantage of what was learned and the technology that was put in place during the pandemic to continue to expand distance education offerings as a means of increasing enrollment. IPEDs data for fall 2024 indicate that all but two of the 35 accredited TCUs offer distance education courses, and 15 offer distance education programs.

TCUs have always had a collaborative working relationship among themselves, with AIHEC, and The College Fund to develop resources for faculty and academic leaders, and to develop programs that meet the needs and support services of their students and the needs of their communities. An example of this includes AIHEC's publication, "Breaking through Tribal Colleges and Universities."

The publication provides the tools and thought processes for colleges to create a framework for appropriate programs and services at their colleges (His Horse is Thunder, 2012).

In addition, TCUs hold a summer conference for Chief Academic Officers, Student Services, Financial Aid, Admission/Registrars, and Institutional Research where best practices are shared along with providing accreditation and federal updates. In 2023 the Human Resources Directors group was added and in 2024 the Chief Financial Officers joined. This is a way for TCUs to share and learn in a collaborative effort among themselves.

The College Fund and AIHEC developed the Cultivating Native Student Success opportunity as a way for TCUs to examine their current approaches and design long-term strategies that include holistic, place-based, and collaborative student support to promote transformative and systemic change that impacts Native student success.

Particular areas of attention include ensuring appropriate academic rigor, meeting general education requirements, having appropriate prerequisites, and having appropriate student assessment and learning outcomes in place. Related considerations might include strategic planning for program development and sustainability, assessment plans, faculty credentials, technology integration, cultural components, and service to the Tribal communities.

- **Tribal College Innovations:** TCUs create a learning environment where students are encouraged to incorporate their cultural identity into their academic pursuits. Native American students at TCUs are more likely to persist in their education, according to studies from American Indian College Fund (2021), when compared to retentions rates at mainstream institutions.
- **Workforce Development and Economic Empowerment:** TCUs have increasingly focused on workforce development to address economic challenges in Native communities. Programs such as job training and career readiness have been enhanced in recent years to include high-demand fields like renewable energy, health care, and digital technology. A 2021 study by the National Indian Education Association (NIEA) found that TCUs are instrumental in providing skills training that is tailored to local economic needs, leading to higher employment rates in Native communities (NIEA, 2021).
- **Student Services** – In the fall 2019, a survey was conducted by the Hope Center and The College Fund with approximately 1,050 students at seven TCUs in the Great Plains and Midwest regions of the United States. The survey indicated a high level of food and housing insecurity (Crazy Bull & Goldrick-Rab, 2020). These are all too common situations that occur within the TCUs student population. As a result, TCUs have developed wraparound services, like tutoring, childcare, counseling, food pantries, emergency aid, and financial aid support to help students succeed. In addition, TCUs provide support services that are grounded in cultural activities, ceremony and spirituality.
- **Faculty and Staff** — Because many TCUs are in remote areas of the country, they experience difficulty attracting well-qualified staff and faculty. These remote locations have led to a practice of growing your own being utilized. It is not uncommon for TCU staff to be graduates from their TCU.
- **Sports** – Not all TCUs offer collegiate sports for their students. Basketball is the most popular, with some having cross country and a number moving into E-Sports. Remote locations and costs are the major barriers. To promote the role of sports, AIHEC has established an Athletic Commission.
- **Preservation of Language and Culture** — TCUs employ Tribal Elders, as well as some Tribal “experts” in Tribal culture who are not yet considered to be “elders.” They may have expertise in such areas as Tribal language or arts but may not be designated as “elders.” In either case, the college should have an established minimum threshold of experience based on the tribe’s defined role of elders and some documentation reflecting those minimum experiences.

Elders often serve as faculty and as resources for the college and the curriculum. All TCUs have the preservation and revitalization of their traditions, language, and culture as a core value and priority for their college. Elders, those individuals within the tribe who carry that designation and role, are often active as faculty in integrating the culture and values into the curriculum and teaching the language and culture classes.

- **Assessment** — TCUs are committed to assessment to improve student learning and demonstrate accountability to their communities and accreditation bodies. They are committed to a foundation of assessment grounded within the unique Tribal cultures and traditions.

In response to the emphasis on outcomes, Tribal Colleges created their own measures of success and, therefore, their own curricular and pedagogical values and approaches in more culturally appropriate ways. By using their mission statements to set their own standards of measuring success, Tribal Colleges can view assessment programs as a means of pursuing their missions, building local capacity, and advancing processes of self-empowerment, self-determination, and decolonization among Native peoples (Karlberg, 2010). AIHEC in 2010 commissioned a publication to be a resource to TCUs in developing their learning outcomes and appropriate measures sensitive to their culture and traditions, entitled “Assessment Essentials for Tribal Colleges.” The publication is still very relevant to the assessment practices for TCUs.

- **AIHEC American Indian Measures for Success (AIMS).** This initiative is creating a national database on Tribal Colleges and an effort to develop culturally relevant indicators of success for TCUs and their communities. Their comprehensive data collection processes are utilized to inform their unique constituents. TCUs understand the principles of data collection and analysis. The initiative is working to collect data on Tribal College enrollment, budgets, curricula, facilities, services, and student outcomes to inform the colleges, AIHEC, the College Fund, and the White House Initiative on Tribal Colleges and Universities.
- **Research and Scholarship** — TCUs have increasingly become centers for research that directly benefit Native communities, including research focused on economic development, tribal sovereignty, and environmental stewardship. Studies conducted by TCU researchers often address critical issues such as land rights, environmental protection, and legal advocacy for Native communities.

TCUs have a growing involvement with scholarly work that directly impacts tribal policy and economic development. TCUs are now recognized as key players in sustainable development and indigenous knowledge systems that are central to addressing both local and global challenges.

TCUs encourage ongoing research by faculty, staff, students, and other affiliated investigators that is consistent with the mission of the College, their tribe, and their community.

All research involving human subjects, for whom students, faculty, and staff are subjects or investigators, whether on campus or elsewhere, is subject to review by the college Institutional Review Board (IRB) to ensure that the research activities meet ethical and legal standards. The college IRB should be designated to ensure that research conducted under its auspices does not individually or collectively harm members of the tribe through the misuse of cultural or other resources.

TCUs are expected to comply with the U.S. Department of Health and Human Services regulations for the protection of human subjects involved in research (Code of Federal Regulations Title 45 Part 46 as revised June 23, 2005). The definition of research used in this policy follows 45 CFR 46.102(d). The regulations define research as “a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge” [Federal Policy § .102(d)] (U.S. Department of Health and Human Services, 2013).

# Part 6: Cultural Competencies/Awareness and Visit Logistics for HLC Peer Reviewers

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Peer reviewers need to recognize and acknowledge that they are guests on the reservation. This section offers guidance on the cultures, customs, and protocols the team should observe while visiting the college.

## Understanding the Context

- **Special Ceremonies and Cultural Customs** — Showing respect and appropriate protocol is essential for the ceremonies that might be performed, prayers offered, and any special recognition of the team that is likely to be included in some aspect of the agenda for the visit. Food will be included and should be accepted. It is appropriate and expected that everyone at the meeting will be allowed to speak if they choose. While the pace at meetings is slower than at a Western institution, it is important to respect the process.

It is not uncommon for members of the TCU community to be wearing ribbon skirts for women and ribbon shirts for men. Ribbon skirts and shirts are deeply significant cultural garments for many Native American communities, particularly for Indigenous women, and they hold a variety of meanings tied to history, identity, spirituality, and tradition. They represent a connection to Native heritage, and their designs and styles are influenced by the particular traditions of a tribe or community. The choice of colors, patterns, and ribbons can carry specific meanings, often tied to the natural world, seasons, or spiritual beliefs.

- **Role of the Team Chair** — The HLC team chair is strongly encouraged to provide appropriate training and information to team members about the unique aspects of visiting a Tribal college. Throughout the visit, the chair should continue ongoing dialogue with team members about their unique experiences during the visit and develop an awareness of distinct aspects of the college's operations that may need further clarification or sensitivity to the college's culture and traditions.

The HLC team chair should be in contact with the TCU and ask about any cultural experiences or norms that the team should be aware of, including a blessing with sage and/or tobacco or other special ceremonies or extending compliments about items that they could potentially lead the Native person to give them the item of compliment. It is also appropriate to ask the college president about the proper protocol for any of the ceremonies so that the college knows the team recognizes their importance.

- **Communication** — Communication in Native American cultures is often distinct from the more competitive, individualistic communication style common in mainstream American society. Native American communication tends to prioritize cooperation, patience, and respect, which are reflected in many aspects of their social interactions and broader cultural values. In conversation, many Native Americans practice active listening, which is often expressed through non-verbal cues such as looking down rather than making direct eye contact with the speaker. This approach to listening signifies attentiveness and respect for the speaker's words (Baker, 2009). Importantly, it is common in many Native communities for individuals to wait until the speaker has finished their entire thought before responding, reflecting a value for uninterrupted discourse and ensuring that each person has the space to fully express themselves without competition or interruption (Galla, 2006; Rogers, 2014). This communication style contrasts with the more interruptive and competitive patterns often observed in Western cultures, where the emphasis may be on asserting one's own perspective or quickly advancing the conversation. The practice of listening and waiting to speak is not only a matter of politeness but is deeply connected to broader cultural principles of balance and mutual respect (Sue & Sue, 2013).

TCU board members, staff, faculty, students and community members may introduce themselves in their Native language. This is an important practice as it honors their cultural heritage and fosters an inclusive environment. When someone introduces themselves in their Native language, listen attentively, even if you do not understand the words. Express genuine interest and respect for their heritage.

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# Acknowledgements

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