



# HIGHER LEARNING COMMISSION

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June 6, 2018

President Paul Robertson  
Tohono O'odham Community College  
Mile Post #125, Highway 86 North  
Sells, AZ 85634

Dear President Robertson:

The interim reports you submitted to our office have now been reviewed. Staff analyses of these reports are attached.

On behalf of the Higher Learning Commission staff received the reports on faculty evaluations, program review, and data management. No further reports are required on these topics. The Standard Pathway Year Four Comprehensive Evaluation is scheduled for 2020 – 2021. The institution's next reaffirmation of accreditation is scheduled for 2026 – 2027.

For more information on the interim report process contact Lil Nakutis, Accreditation Processes Manager, at [lnakutis@hlcommission.org](mailto:lnakutis@hlcommission.org). Your HLC staff liaison is Karen Solomon ([ksolomon@hlcommission.org](mailto:ksolomon@hlcommission.org)); (800) 621-7440 x 127.

Thank you.

HIGHER LEARNING COMMISSION



## STAFF ANALYSIS OF INSTITUTIONAL REPORT

DATE: June 6, 2018

STAFF LIAISON: Karen Solomon

REVIEWED BY: Steven Kapelke

**INSTITUTION:** Tohono O’odham Community College, Sells, AZ

**EXECUTIVE OFFICER:** Dr. Paul Robertson, President

**PREVIOUS COMMISSION ACTION AND SOURCES:** An interim report is required by 1/31/2018 on faculty evaluations.

This interim report derives from the Team Report of the institution’s 2016 Comprehensive Evaluation. The team recommends that the institution submit a specific plan including timeline for evaluating faculty.

**REPORT PRESENTATION AND QUALITY:** The Tohono O’odham Community College interim report on faculty evaluation is clearly written and organized effectively into four parts, with accompanying attachments and appendices.

**REPORT SUMMARY:** The first three parts/sections (1-3) of the TOCC interim report on faculty evaluation provide a brief overview of, and context for, the main content of the document. Part 4 comprises the substance of the report and is presented in two main subsections, A and B.

Subsection A begins with a brief summary of the institution’s efforts with regard to faculty evaluation, then segues into a detailed timeline of these efforts. The summary notes that the “*comprehensive plan for evaluating faculty*” was a joint effort of the Faculty Senate, the Education Division, and the Human Resources Department. Here the report also identifies the range of components that will make up the evaluation plan, as suggested in the 2016 HLC Team Report. The resulting evaluation form for full-time faculty members was approved by the TOCC Faculty Senate in January 2018 and will be employed for calendar year 2017 evaluations.

The timeline provided in the report is comprehensive, commencing in September 2015 with the appointment of a new Assessment Coordinator, who undertook review of the student course evaluation process, and ending in January 2018 with the Faculty Senate approval of the Faculty Evaluation Form. Other key dates presented in the timeline include these:

*October 21, 2016 – President, Vice President of Education, and Academic Chair attend the T-Ba'itk Faculty Senate meeting to discuss classroom visitations. The faculty and administrators agree unanimously that a peer faculty member will participate in classroom visitations along with the Chairs (Academic and Occupational Chairs, as appropriate for each faculty member). The Faculty Senate commits to creating a rubric for the classroom visitations.*

*October 31, 2016 – The Faculty Senate President emails the Faculty Senate's draft rubric for classroom visitation to the Academic Chair, with faculty and other administrators cc'd. See Appendix 4 Faculty Classroom Visitation Rubric 10.30.2016.*

*February 13, 2017 – The Human Resources Director emails the Faculty Evaluation Form to the Academic Chair with instructions for the completed forms to be submitted to the next highest supervisor by February 28, 2017 and back to Human Resources by March 3, 2017. The Faculty Evaluation Form was based on the evaluation form for classified staff.*

*February-May 2017 – Faculty evaluations take place, including classroom visitations (by Academic Chair and peers), completion of the evaluation forms, assembly of portfolios, and evaluation meetings between individual faculty and the Academic Chair. The final classroom visitation form appears as Appendix 8 Final Faculty Classroom Visitation Rubric 03.27.2017.*

*September 1, 2017 – The Faculty Senate Vice President and a Faculty Senate member review the Final Faculty Classroom Visitation Rubric and decide that no changes are needed. They make plans to meet the next week to work on the Faculty Performance Evaluation Plan.*

*September-October 2017 – Faculty Senate Vice President reviews and edits the Faculty Evaluation Form with input from faculty colleagues.*

*January 2018 – Professional development and training for faculty is held on January 9. Adjunct faculty attend an orientation while full-time faculty attend a session on Adult Learning and the Man in the Maze Model. See Appendix 13 Spring 2018 Faculty Enrichment Day for the agenda. Faculty spend the rest of the week before classes start (January 8-12) advising students and preparing for classes. Faculty begin recording their professional development activities for portfolios and to share with the Academic Dean.*

Subsection B of Part 4, provides additional detail about some of the specific activities noted in the timeline, noting in particular the development of the classroom visitation form, which changed from a one-page list of seven questions to a two page form containing standards for various levels of performance and a format for collecting observations pertaining to teaching-learning activities.

In the Spring 2017 semester, all faculty members were evaluated through a process that employed three forms of input: student course evaluations; classroom visitation results; and an evaluation form to be completed by the faculty member and the Academic Dean of Occupational Chair. Subsequently, the Education Division and the Faculty Senate collaborated to revise the form, rendering it more comprehensive and consistent with faculty activity. As noted in the timeline above, the Faculty Senate approved the new Faculty Performance Evaluation Form in January 2018, with implementation to begin in 2018. Here the report also provides an implementation schedule for the new plan, which will also serve as a template for future years. This schedule is shown below.

<p><b>JANUARY 2018 (and each January thereafter) for evaluation of previous calendar year (CY)</b>  The Academic Dean will ensure that these steps are completed:</p> <ul style="list-style-type: none"> <li>• Each faculty member has access to an electronic storage system for a portfolio.</li> <li>• Faculty are randomly assigned to serve as peer visitors for their colleagues.</li> <li>• A classroom visitation schedule is set up; visitations are scheduled for February.</li> <li>• Instructors are encouraged to work on their portfolios and prepare for evaluation.</li> </ul> <p>Each faculty member will propose a time for his or her evaluation meeting with the Academic Dean, to take place during the first half of March.</p>
<p><b>FEBRUARY 2018 (and each February thereafter for evaluation of previous CY)</b>  Steps the Academic Dean will take:</p> <ul style="list-style-type: none"> <li>• Carry out classroom visitations and complete the visitation forms.</li> <li>• Ensure that full-time faculty members have made appointments for evaluation.</li> </ul> <p>Steps the Faculty will take:</p> <ul style="list-style-type: none"> <li>• Carry out classroom visitations as peers and complete the visitation form.</li> <li>• Work on own portfolio and Faculty Evaluation Form.</li> </ul>
<p><b>MARCH 2018 (and each March thereafter)</b>  Steps the Academic Dean will take:</p> <ul style="list-style-type: none"> <li>• Hold individual performance evaluation meetings during March 1-15.</li> <li>• Hold follow-up meetings as needed during March 16-31.</li> </ul>
<p>Steps the faculty members will take:</p> <ul style="list-style-type: none"> <li>• Present own portfolio in the evaluation meeting with the Academic Dean.</li> <li>• Conduct follow-up meetings as needed during March 16-31.</li> </ul>
<p><b>APRIL 2018 (and each April thereafter)</b></p> <ul style="list-style-type: none"> <li>• Academic Dean will turn in evaluation forms and portfolio to next higher supervisor by April 5, 2018.</li> <li>• President will turn in forms and portfolios to H.R. Department by April 15, 2018.</li> </ul>
<p><b>JUNE 2018 (and each June thereafter)</b>  By June 30, 2018, the Human Resources Director will verify that all faculty who were slated to be evaluated for CY 2017 were indeed evaluated. Similar confirmation will be made at the end of each fiscal year.</p>

**STAFF FINDING:**

Note the relevant Criterion, Core Component(s) or Assumed Practice(s): Core Component 3.C

Statements of Analysis (check one below)

- Evidence demonstrates adequate progress in the area of focus.
- Evidence demonstrates that further organizational attention is required in the area of focus.
- Evidence demonstrates that further organizational attention and HLC follow-up are required.
- Evidence is insufficient and a HLC focused visit is warranted.

**REPORT ANALYSIS:** The Tohono O’odham interim report on faculty evaluation provides evidence showing that the institution has made substantial progress in developing evaluation procedures and documents.

The timeline provided in the report, and the narrative complement to the timeline, indicate that the College created an inclusive, collaborative process to address concerns pertaining to faculty evaluation. Working together various campus constituencies, including the faculty, developed workable procedures—a plan—and documents, including the Faculty Evaluation Form and the TOCC Faculty Classroom Visitation Form.

The procedures, which are outlined in the schedule summary shown in the Report Summary section above, and the specific measures by which the faculty are evaluated are provided in the report. This includes a rubric by which faculty performance is graded as part of the classroom visitation process. The Faculty Evaluation Form is a comprehensive six-page document consisting of both evaluation categories and a section on “Definition of Terms,” which should prove useful, particularly to new faculty members or those uncertain about certain distinctions, such as that between Professional Development and Service Activities.

TOCC Faculty Classroom Visitation Form provides both a rubric to measure faculty teaching performance and the component parts of each of the three major evaluation categories represented in the Visitation Form: Teaching and Learning Strategies; Learning Environment; and Student Involvement. The rubric is shown in the graphic below.

### OBSERVATION RUBRIC

Use the following rubric, along with the observation instrument on the back of this sheet to evaluate classroom performance.

Criteria	Commendable Performance	Satisfactory Performance	Performance Needs Improvement
<b>Teaching and Learning Strategies</b>	Demonstrated teaching and learning strategies Appear effective	Demonstrated teaching and learning strategies appear adequate	Demonstrated teaching and learning strategies need adjustments
<b>Learning Environment</b>	Creates a positive and supportive learning environment for students	Learning environment appears comfortable for students	Environment does not appear to be sufficiently conducive to learning
<b>Student Involvement</b>	A majority of students appear Actively engaged in learning	Many students actively engaged in learning	Few students actively engaged in learning

**Analysis Concluding Statement:** Indications are that the TOCC faculty evaluation procedures--with appropriate supporting documents--are in place, and implementation to begin during the Spring 2018 semester. According to the report, faculty members will be evaluated on a calendar year rather than an academic year basis, which is something the institution may wish to re-visit in the future, though it is under no compulsion to do so.

Although the College's evaluation system is in place, it has not been tested over time due to its very newness. This is not a criticism; it is apparent that the institution has made serious efforts to devise and implement a workable, sustainable plan for measuring its faculty's performance. Consequently, the Higher Learning Commission will not require additional reporting on this topic. However, the institution should plan to give ongoing attention to this matter, and assume that the next HLC Peer Review Team, which will conduct the AY2020-2021 Comprehensive Evaluation, will examine the institution's progress and ongoing documentation of faculty performance.

**STAFF ACTION:** Receive the report on faculty evaluations. No further reports are required on this topic.

The Standard Pathway Year Four Comprehensive Evaluation is scheduled for 2020 – 2021. The institution's next reaffirmation of accreditation is scheduled for 2026 – 2027.



## STAFF ANALYSIS OF INSTITUTIONAL REPORT

DATE: June 6, 2018

STAFF LIAISON: Karen Solomon

REVIEWED BY: Steven Kapelke

**INSTITUTION:** Tohono O’odham Community College, Sells, AZ

**EXECUTIVE OFFICER:** Dr. Paul Robertson, President

**PREVIOUS COMMISSION ACTION AND SOURCES:** An interim report is required by 1/31/2018 on program review.

This interim report derives from the Team Report of the institution’s 2016 Comprehensive Evaluation. The team recommends that the report is to include *“completed program reviews consistent with the TOCC Program Review Plan that reflects best practices. Program Review appears to still be planned, rather than implemented.”*

**REPORT PRESENTATION AND QUALITY:** The Tohono O’odham Community College (TOCC) interim report on program review (CC 4.A) is organized effectively into a four-part document. The report is written clearly and supported with relevant and effective documentation situated in extensive appendices.

**REPORT SUMMARY:** The first three parts of the four-part TOCC interim report document are brief and provide context for Part 4, which is where the report addresses HLC concerns pertaining to academic program review. Part 4 comprises two subsections (A and B).

Subsection A in the report’s Part 4 consists of an introductory paragraph that offers an overview of the institution’s efforts at developing and implementing its academic program review system. Specifically, the report notes that the College “adopted its first Program Review Plan in February 2016,” with a subsequent revision in January 2017.

The rest of subsection A consists of a timeline, commencing in January 2017, with the revision of the Program Review Plan, and culminating in January 2018, with the submission of the Building Construction Technologies (BCT) program review draft to the President. Other key points in the timeline include the following:

- *April 28, 2017 – first rough drafts of social services, science, business, and liberal arts program reviews completed and reviewed by Faculty Senate*
- *October and November 2017 – Dean of Academics submits Program Reviews for Science, Liberal Arts, Business, and Social Services to the President.*
- *November 2017 – Board of Trustees reviews and accepts program reviews for TOCC's Science, Liberal Arts, Business, and Social Service degrees...*

Subsection B of the report provides additional details of the processes employed by the College in the development and implementation of its Academic Program Review Plan, noting that since the implementation of the Plan, the four largest academic associate degree programs have completed program reviews. These reviews were drafted by the full-time faculty of the respective instructional programs with assistance from the Dean of Academics, who worked with a consultant to provide support for the faculty. Subsequently, the reviews were submitted to the Faculty Senate and the TOCC Cabinet for approval before being forwarded to the Board of Trustees in November 2017. Here the report notes also that the Building Construction Technologies Program (BCT) submitted its draft review in January 2018.

According to the report, the TOCC administration is considering the findings and recommendations derived from the first round of program reviews. These include, but are not limited to, the following:

- *Neither the four academic programs reviewed, nor the BCT program, have program-specific mission statements. Administration is making that a requirement in AY2018*
- *TOCC needs to track its graduates and learn more about how their experiences at TOCC impacted them and was not able to provide detailed data to the programs for their reports. TOCC's plan to join the National Student Clearinghouse should provide limited but insufficient data;*
- *TOCC programs have sufficient and highly qualified faculty for the immediate future, though in order to achieve growth in business and to better support large numbers of liberal arts majors, TOCC may have to expand numbers of adjuncts and full-time faculty members; ...*

The general consensus among the administration and the Board of Trustees, having studied the completed program reviews, was that each represents a viable program, with adequate levels of support. The recommendations included in the reviews are under consideration by the Education Division, which will provide written responses to the administration.

At this point the report states that the next important step is using program review data during the 2018 review of the Colleges strategic plan, citing specifically the second

strategic initiative in the plan, which focuses on “*curricula that aligns with TOCC’s Mission and Vision.*” Here the report notes the need to modify the initial program review timeline, given the institution’s experience with the first round of reviews.

Finally, the body of the report acknowledges the significance of program review in a number of areas, including budget planning, citing the Board of Trustees participation in consideration of the reviews as an indication of the “*importance of program reviews at TOCC [being] recognized at the higher level.*” The inclusionary review process, involving faculty members, the Faculty Senate, the administration, and the Board of Trustees, among other constituents, supports the institution’s belief that the “*culture of the institution has changed as a result of the process involved in preparing the reviews.*”

### **STAFF FINDING:**

Note the relevant Criterion, Core Component(s) or Assumed Practice(s): Core Component 4.A

Statements of Analysis (check one below)

Evidence demonstrates adequate progress in the area of focus.

Evidence demonstrates that further organizational attention is required in the area of focus.

Evidence demonstrates that further organizational attention and HLC follow-up are required.

Evidence is insufficient and a HLC focused visit is warranted.

**REPORT ANALYSIS:** The evidence provided in the TOCC interim report indicates that the institution has made progress toward establishing and implementing an academic program review system (CC 4.A).

The report shows that the College’s Program Review Plan, which was adopted in 2016 and revised in January 2017, is carefully constructed and contains the elements of an effective review system. The following excerpt from the Program Review Plan provides an overview of the Plan’s goals and procedures.

### ***TOCC PROGRAM REVIEW PLAN***

*Academic program review is designed to ensure that programs align with the mission, and that fiscal, human, and other resources needed to support a program are being wisely and appropriately allocated. This plan formalizes the program review process at TOCC.*

*Program reviews of Certificates and Associate programs will be ongoing, and a formal program review of every offering will be carried out once every four years.*

*During the initial phase, major academic programs (i.e., those with most students, including science, social services, business, and liberal arts) will be reviewed by the end of fall semester 2017, and submitted to the Faculty Senate, Cabinet, and Board of Trustees not later than January 2018. Benchmarks and responsible parties are identified in Chart 1. The four- year schedule for program reviews is described in Chart 2.*

*Reviews will entail formal self-study reports to be completed by lead faculty and full- time faculty in those programs being reviewed. The reviews will address alignment with TOCC’s mission, departmental goals, program learning assessment results, enrollment, faculty credentials and engagement, recommendations, and future plans.*

The Plan also contains two charts, the first of which, shown below, contains the program review schedule overview and the individuals responsible for initiating each of the series of actions in the schedule:

**Chart 1 – Sample time line and benchmarks for Program Review at TOCC - actual dates may vary.**

Action	Date	Responsible Party
Notification by President to Dean of Academics to initiate Program Review	August 1	President
Submit completed review to Faculty Senate for review	January 6	Dean of Academics
Faculty Senate review and recommendations submitted to Dean of Academics	February 10	Dean of Academics
President’s Cabinet reviews program review documents and Senate recommendations and makes recommendations to the Board of Trustees	March 10	President
Board of Trustees reviews self-study recommendations	April 15	Board of Trustees
Administration confers with Dean of Academics regarding implementation of recommendations	April 25	President

The Program Review Plan format/template asks that each program review provide responses to a series of eight prompts, including, but not limited to, the following, as articulated in the Plan:

- *Program alignment with college mission and purposes;*
- *Alignment with community needs;*
- *Student Participation and Success;*
- *Program Learning Outcomes, Curriculum and Instruction.*

Review of the completed self-study reports contained in the report’s appendices shows that the four academic associate degree program reviews—from Liberal Arts, Social

Science, Science, and Business—and the Building Construction Technology program follow the template laid out in the Program Review Plan. The review indicates also that the reports are, generally, thorough with regard to their responses to the eight areas of focus, and that the faculty members responsible for crafting the self-studies have taken seriously their responsibilities with regard to program review. (It should be noted here that the BCT program review included in the appendices is in draft form and waiting for approval.)

Analysis Concluding Statement: TOCC has worked diligently to craft an effective Program Review Plan that includes components that align with program review formats/systems common in higher education. The first completed reviews are, generally, consistent with the format presented in the Plan and appear thorough and written with due consideration of the eight areas of focus designated in the format. Based on the information provided in the two charts included in the Plan, it is also evident that the institution has a clearly defined schedule for all program reviews going forward, with areas of responsibility clearly designated. (Note: the TOCC Program Review Plan does not seek evaluation from external reviewers, which many higher education plans require. This is not a mandatory component, but may be an issue for the institution to consider as it moves forward with program review.)

Because the College's program review system is newly installed and implemented, there is no available data to measure its long-term effectiveness with regard to the data derived from the reviews. This is not a criticism; the institution has demonstrated its initial commitment to the program review process, and the Higher Learning Commission will not require additional reporting on this topic.

Nonetheless, the subject of academic program review, and the means by which the data resulting from the review process is employed within the institution, should receive continuing and significant attention on the part of the College. (Please note the designation in the Staff Finding section above.)

**STAFF ACTION:** Receive the report on program review. No further reports are required on this topic.

The Standard Pathway Year Four Comprehensive Evaluation is scheduled for 2020 – 2021. The institution's next reaffirmation of accreditation is scheduled for 2026 – 2027.



STAFF ANALYSIS OF INSTITUTIONAL REPORT

DATE: June 6, 2018

STAFF LIAISON: Karen Solomon

REVIEWED BY: Steven Kapelke

**INSTITUTION:** Tohono O’odham Community College, Sells, AZ

**EXECUTIVE OFFICER:** Dr. Paul Robertson, President

**PREVIOUS COMMISSION ACTION AND SOURCES:** An interim report is required by 1/31/2018 on data management.

This interim report derives from the Team Report of the institution’s 2016 Comprehensive Evaluation. The team recommends that the report should include the following:

- A detailed plan and timeline for ensuring the security and reliability of data, centralizing data, and making it readily available as appropriate to the College constituency.
- A detailed plan for communicating key data points consistently throughout the College community and for providing data as needed from the Office of Institutional Research.

**REPORT PRESENTATION AND QUALITY:** The Tohono O’odham Community College (TOCC) interim report on data management is organized effectively and presented clearly. Information contained in the appendices is relevant and useful and includes the institution’s Data Management Plan and the Developmental Education Study, 2009-2015, among other documents.

**REPORT SUMMARY:** The College’s report begins with what is, essentially, a three-part introduction (1-3) that provides context for the body of the report, which begins in part 4. This is titled *Addressing Data Management issues at TOCC* and consists of two major sections (A and B).

Part 4 leads with a paragraph that provides a brief summary of the institution’s efforts following the 2016 HLC Comprehensive Evaluation and noting that “*TOCC’s data collection, management, and data use for decision-making—its data management practices—matured rapidly in 2016-2017.*” Included among the list of improvements cited in this paragraph are the formation of a Leadership and Data Team, systematic

review of data sets, and collaboration with Achieving the Dream's data and leadership staff.

Section A under Part 4 consists solely of a timeline that outlines the institution's major actions in addressing concerns about its data management practices. The timeline begins in Spring 2016 and concludes in November 2017. Among the key points cited in the timeline are these:

- *March, April, and May 2016 – Institutional Effectiveness (IE) personnel and TOCC president presented key data, including TOCC graduate survey and demographic data to the eleven District Councils of the Tohono O'odham Nation and to the Tohono O'odham Legislative Council. Result was strong support from the Districts and the Legislative Council culminating in May 31, 2017 decision by the Tohono O'odham Legislative Council to provide TOCC with \$24,266,880 in operating funds available at 20%/annum for Fiscal Years 2018-2022.*
- *Fall 2016 - Central repository for TOCC data established and available through TOCC's new website at [tocc.edu](https://www.tocc.edu/institutional-effectiveness) (see: <https://www.tocc.edu/institutional-effectiveness>).*
- *June 20, 2017 - Leadership and Data team initiated June 20, 2017. Membership of 15 persons represents a mix of persons across divisions and responsibilities (includes Directors, Deans, Administrative Assistants, and others). Goals include data review and use in recommending decisions.*
- *Summer 2017 – Institutional Effectiveness completes Data Management Plan*
- *November 28, 2017 – One-day review of TOCC's IT cyber infrastructure by four-person team from American Indian Higher Education Consortium. As a result, TOCC will seek to join Internet2 in 2018 in order to increase connectivity and reduce costs. The move will help ensure a more stable environment and bolster TOCC's data management capabilities.*

Section B in Part 4 provides what the report terms a "Narrative overview" of the College's efforts to address concerns noted in the 2016 HLC Team Report. Beginning with a summary of the recommendations contained in the Team Report, Section B goes on to describe how it has responded to the recommendations.

First, the report notes that TOCC now possesses a centralized repository for data, which is located on the institution's website and contains an excel list of TOCC Data Reports. The College's Data Management Plan, which is also available on the website, itemizes the types of available data, the means by which to access the data, and the institution's plan for distributing the data among the College's constituencies. The Plan also identified key data that is still not available, citing in particular "*comprehensive data on students who graduate and/or transfer from TOCC to other colleges and universities.*"

In response to the HLC Team Report's emphasis on consistent use of reliable data, the report states that the institution has made progress in this area, citing several meaningful decisions that were "Data-informed." These include, but are not limited to, the following as enumerated in the report:

- 1) *decision to implement the Carnegie Math Pathways program in fall semester 2018 , a decision made pursuant review of developmental education course completions.*
- 2) *the decision to reorganize the Student Services Division by splitting responsibilities...*
- 3) *the decision to move quickly to join the National Clearinghouse was made upon review of alumni tracking survey and in clear recognition of our need to track students who have left TOCC prior to and after graduation...*
- 4) *the decision to place GPC chips in the four TOCC vans that provide student transportation, and to provide an app so that students could track van locations on smart phone which was based on an in-house transportation survey...*

In elaborating on the above, the report describes briefly the data review procedures undertaken by working groups such as the Data and Leadership Team, citing, for example, the Team's study of "*responses to the World Café process where staff and faculty at an All Staff meeting had reviewed the Institutional Capacity Assessment Tool results.*"

Here the report notes also that developmental education is among the seven major initiatives identified for the next five years, and cites the low percentage of students (32%) who completed the developmental course sequence. This led to the decision to take a different tack with regard to developmental math—and, more specifically, the adoption of the Carnegie Math Pathways model, as shown in the list above.

Similarly, the document describes the basis for the reorganization of the Student Services Division, and acknowledges ascertaining the reliability of data as being "*an ongoing process*" involving regular collaboration among several administrative areas, including the Office of Admissions and Records, the Outreach Coordinator the Office of Institutional Effectiveness (IE). IE holds the responsibility for a wide range of activities and initiatives pertaining to data collection, analysis and reporting.

The final statement in the report narrative notes that significant strides the institution has made with regard to data management, while also stating the College's recognition that "*TOCC has a good deal of room to improve in the area...*"

**STAFF FINDING:**

Note the relevant Criterion, Core Component(s) or Assumed Practice(s): Core Component 5.C

Statements of Analysis (check one below)

- Evidence demonstrates adequate progress in the area of focus.
- Evidence demonstrates that further organizational attention is required in the area of focus.
- Evidence demonstrates that further organizational attention and HLC follow-up are required.
- Evidence is insufficient and a HLC focused visit is warranted.

**REPORT ANALYSIS:** The materials presented in the interim report make it evident that TOCC has worked diligently since 2016 to revise and upgrade its procedures and practices in the area of data management. Indications are that these efforts have led to notable improvements.

These improvements include structural changes, such as the formation of the Leadership and Data Team and procedural ones as well, including what the report terms “*systematic review of data sets.*” The institution’s collaboration with the Achieving the Dream’s (ATD) data staff has provided both additional resources for the institution’s work with data management and an external source through which this work can be measured.

In this regard, the College also used its network with the American Indian Higher Education Consortium to undertake an evaluation of its data/cyber infrastructure, which resulted in the in College’s decision to make technological changes that would vastly increase connectivity, lower costs, and, ideally create a more stable technological environment through which to manage data. The activities described here show an effective use of institutional resources that, at the same time, brings additional perspective to the College’s data management challenges.

The timeline provided in the report provides an effective overview of the institution’s key activities pertaining to its data based activities since 2016; several of these are listed in the Report Summary section above. Perhaps the most significant of these, in addition to the formation of the Leadership and Data Team, are the development of the Data Management Plan and the establishment of the central repository for TOCC data on the institution’s website. The Data Management Plan, though succinct in nature, is organized effectively around key topics, such as “*Types of data that are available and that can be created,*” and “*Accessing and requesting data.*”

Review of the website confirms that the institution has created what is, generally, an effective means of communicating key data to its campus constituencies and the general public. The site contains a “Fast Facts” category as well as categories designated as “Surveys,” “Notes,” and “Reports and Data,” the last of which consists of a wide range of current data, including the Data Management Plan, IPED report/data, TOCC Employee Stats Feb. 2018, and the College’s Strategic Plan, among many other items. Each of these are easily accessed by clicking on the appropriate link. Further, review of data such as that provided through a link to, for example, the Graduate Exit Survey, indicate that the institution is working to provide thorough and accurate information through the site.

The following is an excerpt (page one of three) from the overview of TOCC Data Reports provided in the appendices

TOCC Data Reports			
Data Sets/Reports	Description	Data Presented	Decisions
1 Developmental Education Completions - Quantitative	Dev. Ed. Classes - average time in semesters to complete developmental tracks in math, reading and writing, plus percentage of non-completers (50%)	Presented to Cabinet, Leadership and Data Team, Achieving the Dream Coaches on Oct. 27, 2017.	President determined that TOCC will pursue Carnegie Math Pathways and will implement quantway and statway in fall semester 2018 to address high attrition rate.
2 AIMS-AKIS - Quantitative and Qualitative, required by AIHEC (American Indian Higher Education Consortium)	AIMS-AKIS includes data from all tribal colleges and is available for comparison. Comparison with other TCUs in areas of retention, persistence, grad rates, and other dimensions. Definitions differ from IPEDS. TOCC is often first to report.	Presented overview to Cabinet & Leadership and Data Team - 2017. Will present another overview of similar material to BOT during winter 2018 retreat in February.	Continue to share AIMS-AKIS data at regular intervals (per the Data Management Plan) so that College constituencies are aware of the overall picture of TOCC in terms of its statistics and comparisons to other TCUs
3 Southwest TCU Comparison Quantitative	Using the AIMS-AKIS, IE compared southwest TCUs' graduation & retention rates, TOCC falls below Dine and Navajo Tech	Presented to BOT, Cabinet & Leadership and Data Team Summer and Fall 2017	Recognition that TOCC's retention rate of 32% per AIMS-AKIS is unsatisfactory. Organization of Student Services Changed by eliminating VP Student Services and dividing workload into a Director of Residence Life and a Dean of Student Services in November 2017 with BOT support.
4 IPEDS - Quantitative, required by DOE	Differing definitions from AIMS-AKIS, can compare to other schools across US	Retention data, computed on FTE of 15 instead of 12 as in AIMS-AKIS shows 50% retention for 2015.	President conferred with Academic Advisor and Dean of Education and determination made to encourage students to register for 15 or more credits if they are able as opposed to 12 which is the general rule at TOCC and other TCUs as well, but it contradicts data in our reports and nationwide that show that <i>Time is the Enemy</i> .
5 TOCC Enrollment Survey	Survey on why students choose TOCC	Presented to the Cabinet	
6 SENSE - CCSSE (Survey of TOCC students)	Fall 2017 -Results to be available Mar. 2018	Will present to All Staff with student invitees and to Board of Trustees in March or April 2018	Pending
7 Institutional Capacity Assessment Tool (ICAT).	Indirect measures from faculty and staff survey over seven dimensions including leadership and vision, teaching and learning - 100% participation of TOCC faculty and staff in fall semester 2017	World Café event on October 27, 2017 facilitated by Achieving the Dream coaches during TOCC All Staff, reviewed results. Results also discussed during Nov 7 2017 Leadership and Data Team meeting.	A variety of recommendations were made and codified in the November 7, 2017 Leadership and Data team notes. Follow-up is needed.

In addition to the activities noted above, the institution has made strides in employing relevant data for the purposes of decision-making. The report notes several examples of this, with regard to: 1) development education, and particularly in development mathematics; 2) reorganization of the Student Services Division; and 3) the decision to join the National Student Clearinghouse with related efforts to develop comprehensive data on students who graduate and/or transfer from TOCC.

Analysis Concluding Statement: Despite its very positive efforts to date, TOCC still has work to do in continuing to improve its data management system and using the resulting data for the purposes of decision-making; the institution, to its credit, acknowledges this. Although the Higher Learning Commission will not require additional reporting on this subject, it is important that the institution give continued and significant attention to the area of data management. (Please see the Staff Finding section above.) The College should assume that the HLC Peer Review Team conducting the AY2020-2021 Four-Year Comprehensive Evaluation will examine the institution's progress in this area.

**STAFF ACTION:** Receive the report on data management. No further reports are required on this topic.

The Standard Pathway Year Four Comprehensive Evaluation is scheduled for 2020 – 2021. The institution's next reaffirmation of accreditation is scheduled for 2026 – 2027.