



## Federal Compliance Worksheet for Review Panels and Evaluation Teams

Effective September 1, 2014 – August 31, 2016

### Evaluation of Federal Compliance Components

The panel reviews each item identified in the Federal Compliance Guide and documents its findings in the appropriate spaces below. The panel should expect the institution to address these requirements with brief narrative responses and provide supporting documentation, where necessary. If the panel finds in the course of this review that there are substantive issues with the institution's fulfillment of these requirements, it should document them in the space provided below.

This worksheet outlines the information the panel should review in relation to the federal requirements and provides spaces for the team's conclusions in relation to each requirement. The panel should refer to the Federal Compliance Guide for Institutions and Evaluation Teams in completing this worksheet. The Guide identifies applicable Commission policies and an explanation of each requirement. **The evaluation team will review the areas the panel identified for further review and will consider the panel's work in light of information gained in the on-ground visit.**

**Institution under review: Tohono O'odham Community College**

**Panel Members:**  
**Donald Johns, PhD**  
**Sandra Gautt, PhD**

## DETAILED REVIEW OF FEDERAL COMPLIANCE

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### Assignment of Credits, Program Length, and Tuition

*Address this requirement by completing the “Team Worksheet for Evaluating an Institution’s Assignment of Credit Hours and on Clock Hours” in the Appendix at the end of this document.*

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### Institutional Records of Student Complaints

*The institution has documented a process in place for addressing student complaints and appears to be systematically processing such complaints as evidenced by the data on student complaints since the last comprehensive evaluation.*

1. Review the process that the institution uses to manage complaints as well as the history of complaints received and processed with a particular focus in that history on the past three or four years.
2. Determine whether the institution has a process to review and resolve complaints in a timely manner.
3. Verify that the evidence shows that the institution can, and does, follow this process and that it is able to integrate any relevant findings from this process into its review and planning processes.
4. Advise the institution of any improvements that might be appropriate.
5. Consider whether the record of student complaints indicates any pattern of complaints or otherwise raises concerns about the institution’s compliance with the Criteria for Accreditation or Assumed Practices.
6. Check the appropriate response that reflects the team’s conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission’s requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission’s requirements and recommends Commission follow-up.

The team also has comments that relate to the institution’s compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

#### Comments:

**The process and procedures for reporting and addressing academic policy complaints are detailed in the Student Handbook. The handbook specifies the reporting process for sexual harassment complaints as well as other misconduct or unprofessional conduct of TOCC employees. The institution has had a total of 3 complaints between 2011 and 2015. There is no discernable pattern due to the small number. All complaints were identified as being resolved through the grievance process.**

#### Team Follow-up

The team reviewed two actual complaint logs and found that they had been handled appropriately.

Additional monitoring, if any:

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### Publication of Transfer Policies

*The institution has demonstrated it is appropriately disclosing its transfer policies to students and to the public. Policies contain information about the criteria the institution uses to make transfer decisions.*

1. Review the institution's transfer policies.
2. Review any articulation agreements the institution has in place, including articulation agreements at the institution level and program-specific articulation agreements.
3. Consider where the institution discloses these policies (e.g., in its catalog, on its web site) and how easily current and prospective students can access that information.

Determine whether the disclosed information clearly explains the criteria the institution uses to make transfer decisions and any articulation arrangements the institution has with other institutions. Note whether the institution appropriately lists its articulation agreements with other institutions on its website or elsewhere. The information the institution provides should include any program-specific articulation agreements in place and should clearly identify program-specific articulation agreements as such. Also, the information the institution provides should include whether the articulation agreement anticipates that the institution under Commission review: 1) accepts credit from the other institution(s) in the articulation agreement; 2) sends credits to the other institution(s) in the articulation agreements that it accepts; or 3) both offers and accepts credits with the other institution(s).

4. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

#### Comments:

**The TOCC policy for transfer of academic credits is an addendum to the 2014-2016 TOCC College Catalog, and is accessible online. Articulation agreements are through AZ Transfer, the coordinating body of the articulation and transfer system serving the state's public secondary and post-secondary educational institutions including its tribal colleges. The website home page includes a link to AZTransfer. Courses are transferable from institution to institution participating in the network. The catalog addendum more clearly identifies the process and criteria by which other transfer credit will be evaluated, clarifies the timeframe in which courses could be taken and specifies the exclusion of developmental courses.**

Additional monitoring, if any:

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### Practices for Verification of Student Identity

*The institution has demonstrated that it verifies the identity of students who participate in courses or programs provided to the student through distance or correspondence education and appropriately discloses additional fees related to verification to students and to protect their privacy.*

1. Determine how the institution verifies that the student who enrolls in a course is the same student who submits assignments, takes exams, and earns a final grade. Consider whether the institution's approach respects student privacy.
2. Check that any fees related to verification and not included in tuition are explained to the students prior to enrollment in distance courses (e.g., a proctoring fee paid by students on the day of the proctored exam).
3. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

#### Comments:

**All of Tohono O'odham Community College's course work is provided on campus; the institution does not offer distance or correspondence courses**

Additional monitoring, if any:

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### Title IV Program Responsibilities

*The institution has presented evidence on the required components of the Title IV Program.*

**This requirement has several components the institution and team must address:**

- **General Program Requirements.** *The institution has provided the Commission with information about the fulfillment of its Title IV program responsibilities, particularly findings from any review activities by the Department of Education. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area.*
- **Financial Responsibility Requirements.** *The institution has provided the Commission with information about the Department's review of composite ratios and financial audits. It has, as*

*necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area. (Note that the team should also be commenting under Criterion Five if an institution has significant issues with financial responsibility as demonstrated through ratios that are below acceptable levels or other financial responsibility findings by its auditor.)*

- **Default Rates.** *The institution has provided the Commission with information about its three year default rate. It has a responsible program to work with students to minimize default rates. It has, as necessary, addressed any issues the Department raised regarding the institution's fulfillment of its responsibilities in this area. Note for 2012 and thereafter institutions and teams should be using the three-year default rate based on revised default rate data published by the Department in September 2012; if the institution does not provide the default rate for three years leading up to the comprehensive evaluation visit, the team should contact Commission staff.*
- **Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures.** *The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations.*
- **Student Right to Know.** *The institution has provided the Commission with information about its disclosures. It has demonstrated, and the team has reviewed, the institution's policies and practices for ensuring compliance with these regulations. The disclosures are accurate and provide appropriate information to students. (Note that the team should also be commenting under Criterion One if the team determines that disclosures are not accurate or appropriate.)*
- **Satisfactory Academic Progress and Attendance.** *The institution has provided the Commission with information about policies and practices for ensuring compliance with these regulations. The institution has demonstrated that the policies and practices meet state or federal requirements and that the institution is appropriately applying these policies and practices to students. In most cases, teams should verify that these policies exist and are available to students, typically in the course catalog or student handbook. Note that the Commission does not necessarily require that the institution take attendance but does anticipate that institutional attendance policies will provide information to students about attendance at the institution.*
- **Contractual Relationships.** *The institution has presented a list of its contractual relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for contractual relationships (If the team learns that the institution has a contractual relationship that may require Commission approval and has not received Commission approval the team must require that the institution complete and file the change request form as soon as possible. The team should direct the institution to review the Contractual Change Application on the Commission's web site for more information.)*
- **Consortial Relationships.** *The institution has presented a list of its consortial relationships related to its academic program and evidence of its compliance with Commission policies requiring notification or approval for consortial relationships. (If the team learns that the institution has a consortial relationship that may require Commission approval and has not received Commission approval the team must require that the institution complete and file the form as soon as possible. The team should direct the institution to review the Consortial Change Application on the Commission's web site for more information.)*

1. Review all of the information that the institution discloses having to do with its Title IV program responsibilities.

2. Determine whether the Department has raised any issues related to the institution's compliance or whether the institution's auditor in the A-133 has raised any issues about the institution's compliance as well as look to see how carefully and effectively the institution handles its Title IV responsibilities.
3. If an institution has been cited or is not handling these responsibilities effectively, indicate that finding within the federal compliance portion of the team report and whether the institution appears to be moving forward with corrective action that the Department has determined to be appropriate.
4. If issues have been raised with the institution's compliance, decide whether these issues relate to the institution's ability to satisfy the Criteria for Accreditation, particularly with regard to whether its disclosures to students are candid and complete and demonstrate appropriate integrity (*Core Component 2.A and 2.B*).
5. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

**Comments:**

**Tohono O'odham Community College has no adverse findings for its Title IV program, including no limitation suspension or termination actions from the U.S. Department of Education. There are no fines, letters of credit, or heightened monitoring arising from the Department of Education, and therefore, no necessary responses or corrective actions. The College Audited Financial Statements from fiscal years 2011-2015 did not identify any material weaknesses in the processing of financial aid.**

**Recent composite ratio score above 1.5 threshold of financial responsibility – the most recent HLC financial indicator document noted increasing CFI scores significantly above the 1.5 threshold – 2009 (5.0), 2010 (6.6) and 2011 (7.2).**

**Tohono O'odham Community College statement that it does not participate in any student loan programs; therefore, the default rates of student loans do not apply was verified through Financial Aid information in the College Catalog and federal cohort default rate data from the Federal Student Aid Cohort Default Rate database.**

**Review of the Tohono O'odham Community College website documented that the institution complies with the required disclosures for campus crime information, its gainful employment programs, tuition and fees, accreditation, and transfer policies. These disclosures are accessible directly from TOCC website. Disclosure of information relating to athletic participation, scholarships and other activities is through a link to the Department of Education's Equity in Athletics Data Analysis website. Graduation/completion by gender, ethnicity, receipt of Pell grants are in the IPEDS section of the TOCC website.**

**Policies on ADA, Drug Free Schools and Communities Act, FERPA, and sexual harassment are found in the College Catalog. A more extensive presentation of disclosures addressing academic**

**policies, sexual harassment, student complaints and due process is located in the Student Handbook. The handbook is accessible on the website and can be downloaded as a pdf. Financial aid information is detailed in both the Catalog and Student Handbook, which are directly accessible from TOCC's home page.**

**There have been no Department of Education findings regarding compliance with its satisfactory academic progress regulations. At the beginning of each semester, the Financial Aid Director matches the SAP rules against student grades to verify that they have met the SAP criteria. The Satisfactory Academic Progress and Attendance policies are published in both the college catalog and the student handbook.**

**TOCC's has not relationships that require disclosure under the Commission's contractual or consortial relationship policies.**

**A review by the Team of the independent auditor's reports and A-133 audits raised no issues.**

Additional monitoring, if any:

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### **Required Information for Students and the Public**

1. Verify that the institution publishes fair, accurate, and complete information on the following topics: the calendar, grading, admissions, academic program requirements, tuition and fees, and refund policies.
2. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

### **Comments:**

**TOCC publishes information regarding its calendar, grading, admissions, academic program requirements, and tuition, fees and refund policies in both the College Catalog and Student Handbook. The information is consistent these formats and between with information on specific websites addressing these areas. The information is easily accessible to students from a drop-down menu on the TOCC home page.**

Additional monitoring, if any:

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### **Advertising and Recruitment Materials and Other Public Information**

*The institution has documented that it provides accurate, timely and appropriately detailed information to current and prospective students and the public about its accreditation status with the Commission and other agencies as well as about its programs, locations and policies.*

1. Review the institution's disclosure about its accreditation status with the Commission to determine whether the information it provides is accurate and complete, appropriately formatted and contains the Commission's web address.
2. Review institutional disclosures about its relationship with other accrediting agencies for accuracy and for appropriate consumer information, particularly regarding the link between specialized/professional accreditation and the licensure necessary for employment in many professional or specialized areas.
3. Review the institution's catalog, brochures, recruiting materials, and information provided by the institution's advisors or counselors to determine whether the institution provides accurate information to current and prospective students about its accreditation, placement or licensure, program requirements, etc.

4. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

**Comments:**

**The home TOCC page clearly identifies its affiliation with the Higher Learning Commission in both text format and the inclusion of the HLC mark of affiliation with a verification link to the HLC website. The College Catalog contains a statement detailing the institution's relationship with HLC. TOCC does not have a relationship with other accrediting agencies.**

Additional monitoring, if any:

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**Review of Student Outcome Data**

1. Review the student outcome data the institution collects to determine whether it is appropriate and sufficient based on the kinds of academic programs it offers and the students it serves.
2. Determine whether the institution uses this information effectively to make decisions about academic programs and requirements and to determine its effectiveness in achieving its educational objectives.
3. Check the appropriate response that reflects the team's conclusions:

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.**

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion 4.A

**Comments:**

**The federal compliance document provided employment data or transfer to other higher education institutions for students earning AA, AS or AAS degrees from 2012 to 2015. Systematic collection of data was not described, although the document noted the recent establishment of a new position, Recruiter/Transition Coordinator responsible for gathering such outcome data. Placement data for students receiving certificates was not provided, although a large percentage of the student population enrolls in these programs. The federal compliance document acknowledged the need for continuous improvement in this area and outlined specific steps the institution is taking in regard to the more systematic collection of data and tracking graduates, i.e., hiring staff specifically responsible for institutional research and joining the National Student Clearinghouse.**

**Evaluation of the assurance argument and supporting evidence for Criterion 4 does provide some evidence of the use of measures to improve student learning. The College has put in place a Program Review plan, but has not yet implemented it. Outcomes assessment has taken place for only one program.**

**Additional monitoring, if any:**

**The team recommends that Tohono O'odham Community College, by January 31, 2018, provide to HLC a monitoring report including completed program reviews consistent with the TOCC Program review Plan that reflects best practices such as those listed below. Program Reviews were also a topic of the 2012 Report. At that time it was suggested that "the college could develop a comprehensive plan for the review of all programs." Program Review appears to still be planned, rather than implemented.**

**This deadline is consistent with the evidence presented in the Tohono O'odham Community College Assurance Argument (TOCC Program Review Plan adopted February 2016):**

**Best practice by other institutions often includes the following elements::**

- **Programmatic outcomes assessment**
- **An analysis based on data of program strengths and weaknesses**
- **Strategies for building on strengths and weaknesses**
- **Plans for future directions for the programs, for all Associate Degrees and Certificates**
- **Assessment of the outcomes of the Arizona AGEC certificate**
- **A schedule for ongoing program reviews for both curricular and co-curricular offerings.**
- **Program persistence and completion rates, enrollment and/or participation for each program,**
- **Program employment and transfer data.**

## Standing with State and Other Accrediting Agencies

*The institution has documented that it discloses accurately to the public and the Commission its relationship with any other specialized, professional or institutional accreditor and with all governing or coordinating bodies in states in which the institution may have a presence.*

*The team has considered any potential implications for accreditation by the Higher Learning Commission of sanction or loss of status by the institution with any other accrediting agency or loss of authorization in any state.*

***Important note: If the team is recommending initial or continued status, and the institution is now or has been in the past five years under sanction or show-cause with, or has received an adverse action (i.e., withdrawal, suspension, denial, or termination) from, any other federally recognized specialized or institutional accreditor or a state entity, then the team must explain the sanction or adverse action of the other agency in the body of the Assurance Section of the Team Report and provide its rationale for recommending Commission status in light of this action. In addition, the team must contact the staff liaison immediately if it learns that the institution is at risk of losing its degree authorization or lacks such authorization in any state in which the institution meets state presence requirements.***

1. Review the information, particularly any information that indicates the institution is under sanction or show-cause or has had its status with any agency suspended, revoked, or terminated, as well as the reasons for such actions.
2. Determine whether this information provides any indication about the institution's capacity to meet the Commission's Criteria for Accreditation. Should the team learn that the institution is at risk of losing, or has lost, its degree or program authorization in any state in which it meets state presence requirements, it should contact the Commission staff liaison immediately.
3. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

Comments:

**The institution reported that it does not have a relationship with any accrediting agencies.**

Additional monitoring, if any:

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## Public Notification of Opportunity to Comment

*The institution has made an appropriate and timely effort to solicit third party comments. The team has evaluated any comments received and completed any necessary follow-up on issues raised in these comments. Note that if the team has determined that any issues raised by third-party comment relate to the team's review of the institution's compliance with the Criteria for Accreditation, it must discuss this*

**information and its analysis in the body of the Assurance Section of the Team Report.**

1. Review information about the public disclosure of the upcoming visit, including sample announcements, to determine whether the institution made an appropriate and timely effort to notify the public and seek comments.
2. Evaluate the comments to determine whether the team needs to follow-up on any issues through its interviews and review of documentation during the visit process.
3. Check the appropriate response that reflects the team's conclusions:

**The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements.**

The team has reviewed this component of federal compliance and has found the institution to meet the Commission's requirements but recommends Commission follow-up.

The team has reviewed this component of federal compliance and has found the institution not to meet the Commission's requirements and recommends Commission follow-up.

The team also has comments that relate to the institution's compliance with the Criteria for Accreditation. See Criterion (insert appropriate reference).

**Comments:**

**The institution provided documentation that it met the Commission's requirements for public disclosure of the upcoming visit in appropriate venues and in a timely manner for comments. A public notice ran monthly for six months in the local tribal newspaper for the period October 2015 through February 2016. The notice provided for both electronic and written comment directly to the Commission.**

Additional monitoring, if any:

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**Institutional Materials Related to Federal Compliance Reviewed by the Panel**

Provide a list materials reviewed here:

Federal Compliance Form  
2014-2016 Catalog  
Student Handbook 2016

TOCC Websites – home page <http://www.tocc.edu/>  
[http://www.tocc.edu/CatalogFinal2014-6\(1\).pdf](http://www.tocc.edu/CatalogFinal2014-6(1).pdf)  
<http://www.tocc.edu/accreditation.htm>  
<http://www.tocc.edu/Catalog%20Addendum%20-%20Transfer%20of%20Credits%20FINAL%201%205%202016.pdf>  
<http://www.tocc.edu/Final%20for%20WEB%20AnRept2014%20as%20of%205.5.pdf>  
<http://www.tocc.edu/updated%2010-12-15%20TOCC-Campus-Safety-Report-20144.pdf>  
<http://www.tocc.edu/Student%20Handbook%202016.pdf>  
[http://www.tocc.edu/schedule\\_of\\_classes.htm](http://www.tocc.edu/schedule_of_classes.htm)  
[http://www.tocc.edu/academic\\_calendar.htm](http://www.tocc.edu/academic_calendar.htm)  
[http://www.tocc.edu/admissions\\_policies.htm](http://www.tocc.edu/admissions_policies.htm)  
[http://www.tocc.edu/tuition\\_and\\_fees.htm](http://www.tocc.edu/tuition_and_fees.htm)

**External Websites**

<http://ope.ed.gov/athletics/>

<http://nces.ed.gov/collegenavigator/?q=Tohono+O%27odham+Community+College&s=all&id=442781#finaid>

[https://www.nslsds.ed.gov/nslsds/nslsds\\_SA/defaultmanagement/cohortdetail\\_3yr.cfm?sno=61&ope\\_id=037844](https://www.nslsds.ed.gov/nslsds/nslsds_SA/defaultmanagement/cohortdetail_3yr.cfm?sno=61&ope_id=037844)

#### Course Syllabi

ACC 101 Financial Accounting  
ANR 186 Water Resources  
ART 205 Painting I  
BIO 100N Biology Concepts  
BIO 109N Natural History of the Southwest  
BUS 200 Business Law  
HIS 142 History of the US II  
HIS 274 History of the Holocaust  
LIT 274 Native American Literature  
MAT 122 Intermediate Algebra - Section 1  
MKT 111 Introduction to Marketing  
PHI 123 History and Philosophy of Science  
SPE 110 Public Speaking  
SSE 110 Introduction to Social Work  
WRT 102 Writing II - Sections 1 and 2

#### Degree Program Plans

Associate of Business in Business Administration (ABUS-BUSA)  
Associate of Arts in Liberal Arts, Open Pathway Option (AALA-OP)  
Associate of Science, Life Science Option (AS-LS)  
Associate of Science, Tohono O'odham Agriculture and Natural Resources Option (AS-TOANR)  
AAS in Tohono Agriculture and Natural Resources (AAS-TOANR)  
AAS in Carpentry (AAS-CAR) (no courses offered current semester)  
AAS in Plumbing (AAS-PLM) (no courses offered current semester)  
AAS in Business Management (AAS-BUSMAN) (Identified later in catalog as AAS in Business)

#### Certificate Requirements

Certificate in Social Services (CRT-SSE)  
Certificate in Child Development Associate Preparation (CRT-CDAP)  
Certificate in Office and Administrative Professions (CRT-OAP)

## Team Worksheet for Evaluating an Institution's Program Length and Tuition, Assignment of Credit Hours and on Clock Hours

**Institution under review: Tohono O'odham Community College**

### Part 1: Program Length and Tuition

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#### Instructions

The institution has documented that it has credit hour assignments and degree program lengths within the range of good practice in higher education and that tuition is consistent across degree programs (or that there is a rational basis for any program-specific tuition).

Review the "*Worksheet for Use by Institutions on the Assignment of Credit Hours and on Clock Hours*" as well as the course catalog and other attachments required for the institutional worksheet.

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### Worksheet on Program Length and Tuition

#### A. Answer the Following Questions

Are the institution's degree program requirements within the range of good practice in higher education and contribute to an academic environment in which students receive a rigorous and thorough education?

Yes                       No

Comments:

Are the institution's tuition costs across programs within the range of good practice in higher education and contribute to an academic environment in which students receive a rigorous and thorough education?

Yes                       No

Comments:

#### B. Recommend Commission Follow-up, If Appropriate

Is any Commission follow-up required related to the institution's program length and tuition practices?

Yes                       No

Rationale:

Examination of the identified degree and certificate programs and a scan of the other degree and certificate programs showed that requirements for associate degree and certificate programs are well within the range of good practice, and TOOC's continued participation in the Arizona Statewide Articulation and Transfer System shows statewide acceptance of the quality of the education provided.

TOOC's tuition is consistent across programs and is at the lower end of the tuition range charged by Arizona community colleges. The out-of-state tuition rate is especially low. All members of the Tohono O'odham nation qualify for the resident tuition rate.

Identify the type of Commission monitoring required and the due date:

## Part 2: Assignment of Credit Hours

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### Instructions

In assessing the appropriateness of the credit allocations provided by the institution the team should complete the following steps:

1. Review the Worksheet completed by the institution, which provides information about an institution's academic calendar and an overview of credit hour assignments across institutional offerings and delivery formats, and the institution's policy and procedures for awarding credit hours. Note that such policies may be at the institution or department level and may be differentiated by such distinctions as undergraduate or graduate, by delivery format, etc.
2. Identify the institution's principal degree levels and the number of credit hours for degrees at each level. The following minimum number of credit hours should apply at a semester institution:
  - Associate's degrees = 60 hours
  - Bachelor's degrees = 120 hours
  - Master's or other degrees beyond the Bachelor's = at least 30 hours beyond the Bachelor's degree
  - Note that one quarter hour = .67 semester hour
  - Any exceptions to this requirement must be explained and justified.
3. Scan the course descriptions in the catalog and the number of credit hours assigned for courses in different departments at the institution.
  - At semester-based institutions courses will be typically be from two to four credit hours (or approximately five quarter hours) and extend approximately 14-16 weeks (or approximately 10 weeks for a quarter). The description in the catalog should indicate a course that is appropriately rigorous and has collegiate expectations for objectives and workload. Identify courses/disciplines that seem to depart markedly from these expectations.
  - Institutions may have courses that are in compressed format, self-paced, or otherwise alternatively structured. Credit assignments should be reasonable. (For example, as a full-time load for a traditional semester is typically 15 credits, it might be expected that the norm for a full-time load in a five-week term is 5 credits; therefore, a single five-week course awarding 10 credits would be subject to inquiry and justification.)

- Teams should be sure to scan across disciplines, delivery mode, and types of academic activities.
  - Federal regulations allow for an institution to have two credit-hour awards: one award for Title IV purposes and following the above federal definition and one for the purpose of defining progression in and completion of an academic program at that institution. Commission procedure also permits this approach.
4. Scan course schedules to determine how frequently courses meet each week and what other scheduled activities are required for each course. Pay particular attention to alternatively-structured or other courses with particularly high credit hours for a course completed in a short period of time or with less frequently scheduled interaction between student and instructor.
5. **Sampling.** Teams will need to sample some number of degree programs based on the headcount at the institution and the range of programs it offers.
- At a minimum, teams should anticipate sampling at least a few programs at each degree level.
  - For institutions with several different academic calendars or terms or with a wide range of academic programs, the team should expand the sample size appropriately to ensure that it is paying careful attention to alternative format and compressed and accelerated courses.
  - Where the institution offers the same course in more than one format, the team is advised to sample across the various formats to test for consistency.
  - For the programs the team sampled, the team should review syllabi and intended learning outcomes for several of the courses in the program, identify the contact hours for each course, and expectations for homework or work outside of instructional time.
  - The team should pay particular attention to alternatively-structured and other courses that have high credit hours and less frequently scheduled interaction between the students and the instructor.
  - Provide information on the samples in the appropriate space on the worksheet.
6. Consider the following questions:
- Does the institution's policy for awarding credit address all the delivery formats employed by the institution?
  - Does that policy address the amount of instructional or contact time assigned and homework typically expected of a student with regard to credit hours earned?
  - For institutions with courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy also equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the timeframe allotted for the course?
  - Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)
  - If so, is the institution's assignment of credit to courses reflective of its policy on the award of credit?

7. If the answers to the above questions lead the team to conclude that there may be a problem with the credit hours awarded the team should recommend the following:
- If the problem involves a poor or insufficiently-detailed institutional policy, the team should call for a revised policy as soon as possible by requiring a monitoring report within no more than one year that demonstrates the institution has a revised policy and evidence of implementation.
  - If the team identifies an application problem and that problem is isolated to a few courses or single department or division or learning format, the team should call for follow-up activities (monitoring report or focused evaluation) to ensure that the problems are corrected within no more than one year.
  - If the team identifies systematic non-compliance across the institution with regard to the award of credit, the team should notify Commission staff immediately and work with staff to design appropriate follow-up activities. The Commission shall understand systematic noncompliance to mean that the institution lacks any policies to determine the award of academic credit or that there is an inappropriate award of institutional credit not in conformity with the policies established by the institution or with commonly accepted practices in higher education across multiple programs or divisions or affecting significant numbers of students.

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## Worksheet on Assignment of Credit Hours

**A. Identify the Sample Courses and Programs Reviewed by the Team** (see #5 of instructions in completing this section)

**Courses:**

**Summer 2014**

HIS 142 Syllabus

MAT 122 Syllabus

Math122Syllabus\_

**Spring 2016**

ACC 101 Financial Accounting

ANR 186 Water Resources

ART 205 Painting I

BIO 100N Biology Concepts

BIO 109N Natural History of the Southwest

BUS 200 Business Law

HIS 142 History of the US II

HIS 274 History of the Holocaust

LIT 274 Native American Literature

MAT 122 Intermediate Algebra - Section 1

MKT 111 Introduction to Marketing

PHI 123 History and Philosophy of Science

SPE 110 Public Speaking

SSE 110 Introduction to Social Work

WRT 102 Writing II - Sections 1 and 2

**Degree Programs**

Associate of Business in Business Administration (ABUS-BUSA)

Associate of Arts in Liberal Arts, Open Pathway Option (AALA-OP)

Associate of Science, Life Science Option (AS-LS)

Associate of Science, Tohono O'odham Agriculture and Natural Resources Option (AS-TOANR)  
AAS in Tohono Agriculture and Natural Resources (AAS-TOANR)  
AAS in Carpentry (AAS-CAR) (no courses offered current semester)  
AAS in Plumbing (AAS-PLM) (no courses offered current semester)  
AAS in Business Management (AAS-BUSMAN) (Identified later in catalog as AAS in Business)

**Certificates**

Certificate in Social Services (CRT-SSE)  
Certificate in Child Development Associate Preparation (CRT-CDAP)  
Certificate in Office and Administrative Professions (CRT-OAP)

**B. Answer the Following Questions**

**1) Institutional Policies on Credit Hours**

Does the institution's policy for awarding credit address all the delivery formats employed by the institution? (Note that for this question and the questions that follow an institution may have a single comprehensive policy or multiple policies.)

Yes                       No

Comments:

Does that policy relate the amount of instructional or contact time provided and homework typically expected of a student to the credit hours awarded for the classes offered in the delivery formats offered by the institution? (Note that an institution's policy must go beyond simply stating that it awards credit solely based on assessment of student learning and should also reference instructional time.)

Yes                       No

Comments:

For institutions with non-traditional courses in alternative formats or with less instructional and homework time than would be typically expected, does that policy equate credit hours with intended learning outcomes and student achievement that could be reasonably achieved by a student in the timeframe and utilizing the activities allotted for the course?

Yes                       No

Comments:

Is the policy reasonable within the federal definition as well as within the range of good practice in higher education? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

Yes                       No

Comments:

## 2) Application of Policies

Are the course descriptions and syllabi in the sample academic programs reviewed by the team appropriate and reflective of the institution's policy on the award of credit? (Note that the Commission will expect that credit hour policies at public institutions that meet state regulatory requirements or are dictated by the state will likely meet federal definitions as well.)

Yes  No

Comments:

Several syllabi examined explicitly alluded to the policy's requirements for the amount of time students should be engaging in course material. Most of the syllabi examined had enough detail regarding requirements and assignments to determine that the course complied with TOOC's policy on award of credit.

Are the learning outcomes in the sample reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit?

Yes  No

Comments:

**The amount of detail in learning outcomes varied widely between syllabi.**

If the institution offers any alternative delivery or compressed format courses or programs, were the course descriptions and syllabi for those courses appropriate and reflective of the institution's policy on the award of academic credit?

Yes  No

Comments:

**Only summer-school sessions were compressed in format and consisted of either a 5-week or an 8-week term. Summer-school syllabi examined were comparable in requirements to the same course syllabi offered during regular semesters. Two summer syllabi explicitly mentioned the amount of time a student was expected to devote to the course outside of FTF class sessions.**

If the institution offers alternative delivery or compressed format courses or programs, are the learning outcomes reviewed by the team appropriate to the courses and programs reviewed and in keeping with the institution's policy on the award of credit? Are the learning outcomes reasonably capable of being fulfilled by students in the time allocated to justify the allocation of credit?

Yes  No

Comments:

Learning outcomes for summer school syllabi were comparable to those in regular semesters.

Is the institution's actual assignment of credit to courses and programs across the institution reflective of its policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

Yes                       No

Comments:

**C. Recommend Commission Follow-up, If Appropriate**

*Review the responses provided in this section. If the team has responded "no" to any of the questions above, the team will need to assign Commission follow-up to assure that the institution comes into compliance with expectations regarding the assignment of credit hours.*

Is any Commission follow-up required related to the institution's credit hour policies and practices?

Yes                       No

Rationale:

**The institution's policy follows the standard federal guidelines; syllabi examined showed that the expectations of the policy are being followed; course learning objectives reflect good practice for each course syllabus examined.**

Identify the type of Commission monitoring required and the due date:

None

**D. Identify and Explain Any Findings of Systematic Non-Compliance in One or More Educational Programs with Commission Policies Regarding the Credit Hour**

## Part 3: Clock Hours

Does the institution offer any degree or certificate programs in clock hours?

Yes

No

Does the institution offer any degree or certificate programs that must be reported to the Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs?

Yes

No

If the answer to either question is “Yes,” complete this part of the form.

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### Instructions

**This worksheet is not intended for teams to evaluate whether an institution has assigned credit hours relative to contact hours in accordance with the Carnegie definition of the credit hour. This worksheet solely addresses those programs reported to the Department of Education in clock hours for Title IV purposes.**

Complete this worksheet **only if** the institution offers any degree or certificate programs in clock hours OR that must be reported to the U.S. Department of Education in clock hours for Title IV purposes even though students may earn credit hours for graduation from these programs. Non-degree programs subject to clock hour requirements (an institution is required to measure student progress in clock hours for federal or state purposes or for graduates to apply for licensure) are not subject to the credit hour definitions per se but will need to provide conversions to semester or quarter hours for Title IV purposes. Clock-hour programs might include teacher education, nursing, or other programs in licensed fields.

For these programs Federal regulations require that they follow the federal formula listed below. If there are no deficiencies identified by the accrediting agency in the institution’s overall policy for awarding semester or quarter credit, accrediting agency may provide permission for the institution to provide less instruction provided that the student’s work outside class in addition to direct instruction meets the applicable quantitative clock hour requirements noted below.

Federal Formula for Minimum Number of Clock Hours of Instruction (34 CFR §668.8)

1 semester or trimester hour must include at least 37.5 clock hours of instruction

1 quarter hour must include at least 25 clock hours of instruction

Note that the institution may have a lower rate if the institution’s requirement for student work outside of class combined with the actual clock hours of instruction equals the above formula provided that a semester/trimester hour includes at least 30 clock hours of actual instruction and a quarter hour include at least 20 semester hours.

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## Worksheet on Clock Hours

### A. Answer the Following Questions

Does the institution’s credit to clock hour formula match the federal formula?

Yes

No

Comments:

If the credit to clock hour conversion numbers are less than the federal formula, indicate what specific requirements there are, if any, for student work outside of class?

Did the team determine that the institution's credit hour policies are reasonable within the federal definition as well as within the range of good practice in higher education? (Note that if the team answers "No" to this question, it should recommend follow-up monitoring in section C below.)

Yes

No

Comments:

Did the team determine in reviewing the assignment of credit to courses and programs across the institution that it was reflective of the institution's policy on the award of credit and reasonable and appropriate within commonly accepted practice in higher education?

Yes

No

Comments:

**B. Does the team approve variations, if any, from the federal formula in the institution's credit to clock hour conversion?**

Yes

No

(Note that the team may approve a lower conversion rate than the federal rate as noted above provided the team found no issues with the institution's policies or practices related to the credit hour and there is sufficient student work outside of class as noted in the instructions.)

**C. Recommend Commission Follow-up, If Appropriate**

Is any Commission follow-up required related to the institution's clock hour policies and practices?

Yes

No

Rationale:

Identify the type of Commission monitoring required and the due date:



**STATEMENT OF AFFILIATION STATUS WORKSHEET**

**INSTITUTION and STATE:** Tohono O'odham Community College AZ

**TYPE OF REVIEW:** Comprehensive Evaluation

**DESCRIPTION OF REVIEW:** Comprehensive evaluation includes a federal compliance panel.

**DATES OF REVIEW:** 03/28/2016 - 03/29/2016

No Change in Statement of Affiliation Status

**Nature of Organization**

**CONTROL:** Tribal

**RECOMMENDATION:** nc

**DEGREES AWARDED:** Associates, Certificate

**RECOMMENDATION:** nc

**Conditions of Affiliation**

**STIPULATIONS ON AFFILIATION STATUS:**

Prior Commission approval is required for substantive change as stated in Commission policy.

**RECOMMENDATION:** nc

**APPROVAL OF NEW ADDITIONAL LOCATIONS:**

Prior Commission approval required.

**RECOMMENDATION:** nc

**APPROVAL OF DISTANCE EDUCATION DEGREES:**

The institution has not been approved for distance education. The institution has not been approved for correspondence education.

*Recommendations for the  
STATEMENT OF AFFILIATION STATUS*

**RECOMMENDATION:** nc

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**ACCREDITATION ACTIVITIES:**

**RECOMMENDATION:**

Interim Report due on 1/31/2018 regarding faculty evaluations, program review, and data management.

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**Summary of Commission Review**

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**YEAR OF LAST REAFFIRMATION OF ACCREDITATION:** 2010 - 2011

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**YEAR FOR NEXT REAFFIRMATION OF ACCREDITATION:** 2015 - 2016

**RECOMMENDATION:** 2026-27

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**ORGANIZATIONAL PROFILE WORKSHEET**

**INSTITUTION and STATE:** 2845 Tohono O'odham Community College AZ

**TYPE OF REVIEW:** Standard Pathway: Comprehensive Evaluation

**DESCRIPTION OF REVIEW:** Comprehensive evaluation includes a federal compliance panel.

No change to Organization Profile

**Educational Programs**

	<u>Program Distribution</u>
Programs leading to Undergraduate	
Associates	10
Bachelors	0
 Programs leading to Graduate	
Doctors	0
Masters	0
Specialist	0
 Certificate programs	
Certificate	10

**Recommended Change:**

**Off-Campus Activities:**

In State - Present Activity

Campuses:

West Campus - Sells, AZ

Additional Locations:

Tohono O'odham Community College, Central Campus - Sells, AZ

**Recommended Change:**

Out Of State - Present Activity

Campuses: None.

**ORGANIZATIONAL PROFILE WORKSHEET**

Additional Locations: None.

**Recommended Change:**

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Out of USA - Present Activity  
Campuses: None.

Additional Locations: None.

**Recommended Change:**

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**Distance Education Programs:**  
Present Offerings:  
None.

**Recommended Change:**

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**Correspondence Education Programs:**  
Present Offerings:  
None.

**Recommended Change:**

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**Contractual Relationships:**  
Present Offerings:  
None.

**Recommended Change:**

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**Consortial Relationships:**  
Present Offerings:  
None.

**Recommended Change:**

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