January 26, 2018

Dr. Paul Robertson
President
Tohono O’odham Community College
Mile Post #125.5, Highway 86 North
PO Box 3129
Sells, AZ 85634

Dear President Robertson:

A Non-financial Panel has reviewed Tohono O’odham Community College’s recent Interim Report. The Panel’s analysis and recommendation are attached; no further monitoring by the Higher Learning Commission (HLC) is required at this time. You are encouraged to review the Panel’s comments and to contact your HLC liaison if you have questions.

Sincerely,

Higher Learning Commission

cc: Ms. Annabah Conn, Accreditation Liaison Officer
Karen Solomon, HLC Staff Liaison
INSTITUTION: Tohono O’odham Community College (TOCC)

EXECUTIVE OFFICER: Dr. Paul Robertson

PREVIOUS HLC ACTION RE: REPORT (If applicable):

ITEMS ADDRESSED IN REPORT: HLC received the institution’s report on the above topic on:

___ 1. Enrollment Changes – Three-year increase or decrease of 80% or more in enrollment for small institutions or 40% or more for large institutions. The three-year change is determined by comparing the current NFI year with the data from three years ago.

__ 2. Degrees Awarded – Three-year increase or decrease of 75% or more in degrees awarded for small institutions and 65% or more for large institutions. The degrees do not include certificates.

___ 3. Full-time Faculty Changes – Three year decrease of 75% or more for small institutions or 50% or more for large institutions in the headcount of full-time faculty (not full-time equivalent).

___ 4. Student Default Rates - Three-year student loan default rate of 30% or more for 2-year institutions or 25% or more for other institutions.

___ 5. Minimal Full-time Faculty - The headcount of full-time faculty (not full-time equivalent) divided by the number of degree programs offered is less than one. Certificates are not included in degree programs offered.

___ 6. Student to Teacher Ratio - The number of undergraduate full-time equivalent students divided by the number of undergraduate full-time equivalent faculty is greater than or equal to 35. This should be calculated using one of two worksheets provided in the Institutional Update.

__ 7. Weak Graduation/Persistence Rates Compared to Peers - The number of full-time equivalent undergraduate students divided by undergraduate degrees awarded is in the highest 3% or in the highest 5% of the 2-year large, 2-year small, 4-year large, or 4-year small institutional peers. Degrees include standalone (more than 50% of the courses are not part of another degree program) certificates for 2-year and 4 year institutions only.

PANEL ANALYSIS:
The Panel reviewed Tohono O'odham Community College’s (TOCC) NFI Report and determined that the College meets the relevant Core Components (3.C., 3.D., 4.A., 4.C., 5.A.) and Assumed Practices (A.5., A.6., B.1.d., B.1.e., B.1.f., B.3.a., D.4.) related to the two indicators that triggered the report:

   Indicator 2, Degrees Awarded, and
   Indicator 7, Graduation/Persistence Rates

Tohono O’odham Community College is one of 36 Tribal Colleges and Universities (TCU) in the United States. With an enrollment of 133 (FTE) in 2016 and 178 (FTE) in 2017, TOCC is one of
the smaller TCUs. The College reported 3 graduates in 2013 and 11 in 2016 the percentage increase in degrees awarded was 266.67%, triggering Indicator 2, Degrees Awarded. Each additional graduate represented a 33% increase in degrees awarded. Indicator 2 would have been triggered by a single additional graduate since the benchmark is set at 8.37% for the top 3% of institutions and 8.18% for the top 5%. The net increase in degrees was 8 between 2013 and 2016.

TOCC provided the following data showing the number of degrees awarded from 2011-2017:

<table>
<thead>
<tr>
<th>Year</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Degrees</td>
<td>7</td>
<td>3</td>
<td>3</td>
<td>10</td>
<td>11</td>
<td>11</td>
<td>16</td>
</tr>
</tbody>
</table>

The Panel calculated the following changes in degrees awarded:

| YOY +/- | NA | -57.14% | 0% | 233.33% | 10% | 0% | 45.45% |
| 3 Year % Gain | NA | NA | NA | 42.86% | 266.67% | 266.67% | 60.0% |

Given the small numbers, TOCC will continue to flag on degrees awarded. The question the Panel had to consider was whether the Indicator truly flagged a concern that the institution would likely fail to meet the Higher Learning Commission’s Criteria for Accreditation and Assumed Practices.

The small numbers have a similar effect on Indicator 7, Graduation Rates. Enrollment increased from 133 in 2016 to 178 in 2017 an increase of 45 students (33.83% year-over-year increase). This growth in student FTE inflated the FTE to graduate ratio, and triggered Indicator 7. With a ratio of 11.13, TOCC was over the 10.27 threshold for the top 3% of peer institutions.

After weighing the evidence submitted in the report, the Panel concluded that the growth in the number of degrees awarded was a sign of TOCC’s effectiveness in serving its mission rather than an indicator that the institution was at risk of failing to meet the criteria. The Panel concluded that (TOCC) is meeting the Criteria Core Components and Assumed Practices as they relate to the percent change of degrees awarded and graduation rates. The College’s low FTE and small graduating classes mean that converting the numbers to percentages magnifies and distorts the actual impact. Since TOCC became independent from Pima Community College, the institution has undertaken numerous steps to improve the quality of their programs and overall student outcomes.

Core Component 3.C.
During its 2016 comprehensive evaluation, the on-site team found that TOCC met 3.C. “with concerns” to improve its systematic evaluation of faculty. The College will submit a monitoring report in January 2018. However, the College used its NFI report as an opportunity to identify changes implemented to address the Commission’s concerns. TOCC reports that this has

1. Conducted classroom observations of all full-time faculty members.
2. Conducted annual evaluations of faculty members.
3. Conducted a series of in-house faculty enrichment activities focusing on teaching from multiple perspectives.
4. Developed, in cooperation with the Faculty Senate, a comprehensive evaluation system to award multi-year contracts and reward faculty for exemplary teaching. The College demonstrated that it has the faculty and staff needed for effective, high-quality programs and student services.

**Core Component 3.D.**
TOCC provides support for student learning and effective teaching by:
1. Providing tutoring 5 days a week.
2. Planning ways to incorporate faculty directly into career advising.
3. Investing in faculty development.
4. Utilizing Canvas, TOCC’s LMS, to enable faculty to connect with their students and the subject matter both on and off campus.

**Core Component 4.A.**
TOCC demonstrates responsibility for the quality of its educational programs. In addition to the investments outlined above, TOCC has reviewed all of its major academic programs. Additionally, TOCC’s office of Institutional Effectiveness surveys the Tohono O’odham Nation’s major employers and District Representatives to identify and prioritize programs. Current needs include IT, Business, and Education degrees. The College’s budget supports 16 full-time faculty, which gives student-to-teacher ratio of nearly 10:1.

**Core Component 4.C.**
The College demonstrates commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its programs by implementing an Early Alert Retention System to identify at-risk students and connect them to campus services. Additionally, they have developed a scholarship program called Achieving the Dream. This scholarship provides emergency grants to provide funding for things that would otherwise cause students to drop out. There is evidence of consistently improving retention rates from 2011 through 2015 in IPEDS for full-time students. Part-time students are historically more likely to stop-out or drop-out. No clear trend is evident in the IPEDS data for improvement in this group.

**Core Component 5.A.**
The College’s resource base supports its current educational programs and its plans for maintaining and strengthening their quality in part because 50% of TOCC’s operating budget comes from the Tohono O’odham Nation’s Legislative Council. TOCC was the first TCU to offer a fully online course in the Tohono O’odham language. It is leveraging its deep relationships with the Nation and the community to expand its offerings, grow the student body, and increase tuition revenue.

**PANEL RECOMMENDATION:**
The Panel has reviewed and evaluated the institutional documents provided (report and supplementary documents) in making its recommendation.

Accept Report
The Panel concludes that the institution has substantially met its commitment in its report on non-financial indicators.
Rationale:
It is clear through its report that Tohono O’odham Community College is taking the necessary steps to address concerns identified in their 2016 Comprehensive Evaluation and is meeting the Core Components. While the increase in the percentage of degrees awarded and the FTE-to-graduate ratios trigger the NFI report, an examination of the institution’s data and practices show a small, but healthy, mission-driven institution. Their recent separation from Pima Community College explains the initial low numbers. However, with the strong support of the Tohono O’odham Nation, TOCC is taking the necessary steps to increase enrollment, improve retention, and increase graduation rates.

Accept Report with Qualifications.
Overall, the institution addressed the core components and assumed practices adequately, however, the panel has concerns on the following matters that the institution should consider in future planning.

Specific concerns:

Recommend HLC Follow-up.
The panel reviewed the materials and has concerns that the institution may be at risk of not meeting specific core components or assumed practices, explained below. The panel is recommending follow-up:

Interim Report – due no sooner than three months from the date of action*.

Focused Visit – to occur within six months of the date of action*.

*HLC staff may adjust this follow-up to be included in future monitoring/visits scheduled with the institution.

Specific Criteria, Core Component and Assumed Practices at risk with explanation: