



March 9, 2015

BY CERTIFIED MAIL

Mr. Lee D. Lambert, Chancellor
Pima County Community College District
4905C E. Broadway Blvd.
Suite C-234
Tucson, AZ 85709

Dear Chancellor Lambert:

This letter is formal notification of action concerning Pima County Community College District (“the College”) by the Higher Learning Commission Board of Trustees (“the Board”). At its meeting on February 26, 2015, the Board removed Probation from the College and placed the College on Notice because, while the College is now in compliance with the Criteria for Accreditation, it remains at risk of being out of compliance with the Criteria for Accreditation and the Core Components identified in the Board’s findings as outlined below. This action is effective as of the date the action was taken. In taking this action, the Board considered materials from the comprehensive evaluation, including the institution’s report, the team report, the IAC Hearing Committee report, the institution’s response to those reports, comments from the College community, and other materials relevant to the evaluation.

The Board required that the College submit a Notice Report no later than July 1, 2016, providing evidence that the College is no longer at risk for non-compliance with the Criteria for Accreditation and Core Components and that it has ameliorated the issues that led to the Notice sanction. The Notice Report should include the following:

- a well-defined, inclusive formal review process of the institution’s mission, including description of implementation and resulting outcomes (Core Component 1.A);
- evidence of the effectiveness of newly adopted policies, processes, and procedures, including but not limited to the effectiveness and outcomes of the newly established Governance Council and Board of Governors’ Finance, Board Human Resources Advisory Team, and Audit Committees (Core Components 2.A, 5.A, and 5.B);
- evidence of a comprehensive assessment of the human resources office, including structure and staffing and an action plan based on the assessment, including goals, metrics, and key performance indicators. The report should also include the outcomes of the recently-established Human Resources Advisory Committee and documentation of progress toward full implementation of the action plan (Core Component 2.A);
- the number and type of complaints and grievances filed with the Office of Dispute Resolution and the status of each complaint or grievance, as well as a process for assessing the effectiveness of the Office, including appropriate metrics and documented outcomes of its work (Core Component 2.A);
- evidence of a process for reviewing syllabi to ensure that all of them have proper and specific learning goals (Core Component 3.A);
- evidence of a process to coordinate and ensure consistency in review of dual learning courses and dual learning faculty training (Core Component 3.A);

- progress of the Developmental Education Redesign Committee, including evidence of its effectiveness and outcomes resulting from it in addition to the allocation of sufficient resources to developmental education to serve the student population (Core Component 3.D);
- evidence of the effectiveness of the assessment process for making changes to the teaching and learning process based on learning outcomes, including documentation of the completion of assessment cycles in all programs and of the changes made to improve learning and teaching (Core Component 4.B);
- evidence that persistence, retention, and completion metrics are used for making changes in programs, including metrics, action plans, and improvements, and documentation of the development and implementation of a strategic plan that addresses retention, persistence, and completion to support the institution's established goals (Core Component 4.C);
- evidence of stability in leadership including campus presidents and evidence of filling key vacant positions such as the Director of Human Resources position (Core Component 5.B); and
- evidence of implementation of the 2014-17 Strategic Plan including completion of the campus plan, establishment of measurable key performance indicators to assess progress toward completion and direct linkages to the budgeting process in addition to outcomes achieved to date (Core Component 5.C);

The Board required that the College host a focused evaluation no later than September 2016 focused on validating the contents of the Notice Report and on the effectiveness and long-term viability of changes at the College. At the time of the visit, the College must demonstrate that recently implemented policies, plans, functions, and structures meet Commission requirements and that they have been effective and are likely to remain successful. If progress in these areas does not continue or if other compliance issues develop at the College, the evaluation team should carefully consider a recommendation of continued Notice or Probation.

The Board will review the Notice Report and related documents at its February 2017 meeting to determine whether the institution has demonstrated that it is no longer at risk for non-compliance with the Criteria for Accreditation and Core Components and whether Notice can be removed, or if the College has not demonstrated compliance, whether accreditation should be withdrawn or other action taken;

In addition, the Board placed the College on the Standard Pathway and required that it host its next comprehensive evaluation for Reaffirmation of Accreditation in 2018-19.

The Board based its action on the following findings made with regard to the College:

The College meets the Criteria for Accreditation and the Core Components.

The College has addressed the concerns of the Commission related to Criterion Two, Core Component 2.A, "the institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows policies and processes for fair and ethical behavior on the part of its governing board, administration, faculty, and staff," for the following reasons:

- the College has implemented necessary internal controls to provide for oversight of its financial, academic, personnel, and auxiliary functions, including the implementation of a policy to promote communication between management and employees and the establishment of Board committees on Finance and Human Resources along with a College Governance Council;
- the College has adopted new policies in many areas including policies on sexual harassment, discrimination and retaliation;
- the College Board, employees and administrators have been trained on revised policies and procedures, as appropriate for their position;

- a new Office of Dispute Resolution has been initiated under the direction of the internal auditor to investigate and act on complaints;
- the College has made appropriate improvements to its Human Resource function;
- the College has changed its purchasing processes, particularly for non-competitive purchases, and has established an infrastructure for guiding ethical and responsible action;
- the College Board has recently undertaken a review of its bylaws.

While the College has addressed the concerns of the Board, it is still at risk of being out of compliance with Core Component 2.A because many changes, including the adoption of new policies and processes, have been developed and implemented only recently so that there has not yet been sufficient time to test and assess the effect of these changes;

The College has addressed the concerns of the Commission related to Criterion Five, Core Component 5.B, “the institution’s governance and administrative structures promote effective leadership and support collaborative processes that enable the institution to fulfill its mission,” for the following reasons:

- the College has established a new framework for College governance that emphasizes collaboration, civility, transparency and respect, among other values, the College Board is working within that framework to engage collaboratively with faculty and administration;
- the College Board has established a Governance Council including student, faculty, and staff representatives to empower these constituents to play a meaningful role in governance of the College;
- the College Board has started training on appropriate policy review and formation, and the Board has formed a Finance and Audit Committee and a Human Resources Advisory Team to strengthen its oversight of the College;
- the Board has implemented effective policies on the role of faculty in academics; and
- the team found during its visit that it appeared the College had improved the climate of openness and inclusivity of individual perspectives.

While the College has addressed the concerns of the Board, it is still at risk of being out of compliance with Core Component 5.B because these approaches have been developed and implemented only recently so that there has not yet been sufficient time to test and assess the effect of these changes; rapid turnover in senior administrative positions remains; and the College has additional work to do in documenting the outcome of its links with the community;

The College has addressed the concerns of the Commission related to Criterion Five, Core Component 5.C, “the institution engages in systematic and integrated planning,” for the following reasons:

- the College has convened a conference and a committee to initiate a strategic plan; a 2014-17 Strategic Plan has been developed and includes directions and goals for the College and will include plans for each campus along with the development of key performance indicators; and
- the College’s strategic planning process engages all constituencies to a greater extent than in the past.

While the College has addressed the concerns of the Board, it is still at risk of being out of compliance with Core Component 5.C because not enough time has transpired to allow the College to fully implement the strategic plan or to demonstrate outcomes and effectiveness; the status of

planning at the campuses remains uneven; key performance indicators for the Plan have not yet been developed; and the College needs to work on continuing the engagement of the community in the planning process.

The College meets with concerns Criterion One, Core Component 1.A, “The institution’s mission is broadly understood within the institution and guides its operations,” because the College has not conducted a formal review of its mission in over a decade and should do so in alignment with the implementation of its strategic plan.

The College meets with concerns Criterion Three, Core Component 3.A, “the institution’s degree programs are appropriate to higher education,” because the team found that the College lacks consistency in maintaining program quality and learning goals.

The College meets with concerns Criterion Three, Core Component 3.C, “the institution has the faculty and staff needed for effective, high-quality programs and student services,” because the College has increasingly relied on adjunct faculty to teach its classes and should monitor its full-time to part-time faculty ratio.

The College meets with concerns Criterion Three, Core Component 3.D, “the institution provides support for student learning and effective teaching,” because the College has recently restructured developmental education and needs to ensure that these changes are supported with appropriate College staff and serve the adult student population well.

The College meets with concerns Criterion Four, Core Component 4.A, “the institution demonstrates responsibility for the quality of its educational programs,” because, although the College recognizes that its graduation, transfer and success rates are low, the College has not yet set benchmarks for academic or institutional success and has limited data on graduate employment outcomes.

The College meets with concerns Criterion Four, Core Component 4.B, “the institution demonstrates a commitment to educational achievement and improvement through ongoing assessment of student learning,” because implementing the assessment process has been slow, and sustaining progress on program review continues to challenge the institution.

The College meets with concerns Criterion Four, Core Component 4.C, “the institution demonstrates a commitment to educational improvement through ongoing attention to retention, persistence, and completion rates in its degree and certificate programs,” because critical metrics on persistence, retention, and completion were added to the institutional dashboard only recently. There is limited evidence of analysis of data collected on course completion and retention and program completion, so the College has not yet established a record of using this data to inform planning and decision making.

The College meets with concerns Criterion Five, Core Component 5.D, “the institution works systematically to improve its performance,” because the College lacks evidence that information gathered in other processes informs planning and that planning is linked strongly to budgeting, and the College has not yet had time to demonstrate that its new structures are effective in addressing these gaps.

The Board action resulted in changes to the affiliation of the College. These changes are reflected on the Institutional Status and Requirements Report. Some of the information from that document, such as the dates of the last and next comprehensive evaluation visits, will be posted to the Commission’s website.

Information about the sanction is provided to members of the public and to other constituents in several ways. Commission Policy INST.G.10.010, Management of Commission Information, anticipates that the Commission release action letters related to the removal or the imposition of a sanction to members of the public. The Commission will do so by posting this action letter on the Commission website along with the Statement of Affiliation Status and Organizational Profile. Also, the enclosed Public Disclosure Notice will be posted to the Commission's website not more than 24 hours after you receive this letter.

Commission policy INST.E.10.010, Notice, subsection Disclosure of Notice Actions, requires that an institution inform its constituencies, including Board members, administrators, faculty, staff, students, prospective students, and any other constituencies about the sanction and how to contact the Commission for further information. The policy also requires that an institution on Notice disclose this status whenever it refers to its Commission accreditation. The Commission will monitor these disclosures to ensure they are accurate and in keeping with Commission policy. I ask that you copy Dr. Solomon on emails or other communications with campus constituents regarding the sanction as required and provide her with a link to information on your website and samples of related disclosures.

In addition, Commission policy COMM.A.10.010, Commission Public Notices and Statements, requires that the Commission prepare a summary of actions to be sent to appropriate state and federal agencies and accrediting associations, and published on its website. The summary will include the Commission Board action regarding the College. The Commission will also simultaneously inform the U.S. Department of Education of the sanction by copy of this letter.

If you have questions about any of the information in this letter, please contact Dr. Solomon. On behalf of the Board of Trustees, I thank you and your associates for your cooperation.

Sincerely,



Barbara Gellman-Danley
President

Enclosure: Public Disclosure Notice

cc: Chair of the Board of Trustees, Pima County Community College District
Evaluation team members
Dr. Mary Ann Martinez Sanchez, Vice Provost, Pima County Community College District
Dr. Karen J. Solomon, Vice President for Accreditation Relations and Director, Standard Pathway,
Higher Learning Commission
Ms. Karen L. Solinski, Vice President for Legal and Governmental Affairs, Higher Learning
Commission
Mr. Herman Bounds, Accreditation and State Liaison, Office of Postsecondary Education, U.S.
Department of Education