



**PimaCommunityCollege**

**RESPONSE  
TO HIGHER LEARNING  
COMMISSION:  
CORRECTIVE ACTION  
PLAN**

Submitted by Pima Community College

March 29, 2013

## Overview

Pima Community College submits this response to the findings of the Higher Learning Commission fact-finding team that visited the College in January. In accordance with HLC procedure, we also have included comments and clarification of some of the individual findings in the team's report.

This response must begin with an unequivocal and clear-eyed assessment of the report's fundamental conclusions: the College recognizes there have been "serious concerns" associated with our compliance with several of the HLC's Criteria for Accreditation and Core Components.

We also recognize and accept full responsibility for the "serious breaches of integrity" in College administration and governance. As a result of the errors made by the College, we know that the HLC and many members of the community we serve have profound doubts about our commitment to the public good.

The restoration of public and accreditor confidence in the College must be our number one priority. We fully understand that many things must change for the College to regain the trust it long has enjoyed from our students, employees, our community and from the HLC.

Change is the animating principle of this response. We already have started to remedy the deficiencies regarding governance, administration and institutional culture detailed in the report. We know that we have much more to do for College leadership to be recognized as responsible stewards and for our school to regain its well-earned reputation as a great place to work.

Fortunately, we already have a strong process in place to quickly make substantive change. Our activities will be consolidated into our 2013-2015 College Plan, a detailed blueprint for addressing key issues facing the College. Each strategy and action item in the College Plan contains a deadline, funding source and responsible administrator, and references the HLC Core Component that it supports. The 2013-15 Plan reflects insights from community members, as well as students, faculty, staff, administrators and the Governing Board, which has final approval. As the Plan is an instrument by which the public can hold the College accountable, the HLC can be sure that once an item is in the College Plan, it will get done.

The items detailed on the following pages represent a starting point that we call our Corrective Action Plan. We intend to expand and enhance the list through collaboration with internal and external constituencies, particularly our critics. We would welcome HLC assistance in developing the plan and we seek recommendations for independent consultants to guide this process. We also would welcome periodic review by HLC to ensure progress and implementation satisfactory to the HLC.

## **How the Corrective Action Plan is organized**

Below is an outline of College activities divided into four areas:

1. Institutional culture
2. Governance and administration
3. Finance
4. Human Resources

Within each area, activities are designated as Completed, In Progress or Planned.

### **1. Institutional culture**

- Planned
  - a) Make whole the individuals who came forward with allegations of sexual harassment. The College will explore a process to ask the women or their representatives if they want to meet with College representatives and an independent, mutually agreed-upon mediator to discuss appropriate remedies.
  - b) PCC accepts that misapplications of the power relationship between supervisors and employees at all levels of College hierarchy resulted in a “culture of fear” that hurt productivity and stifled innovation and the free flow of ideas. We recognize that culture cannot be altered solely by changes in policy, regulation or executive fiat. The College will engage the services of nationally recognized leaders in organizational politics, institutional transformation and interpersonal communication in order to ingrain best practices into everyday life at PCC. The College welcomes any insights from the HLC to make PCC a model workplace for all employees.
  - c) The College will conduct an Organizational Climate Survey of employees, students and community leaders in order to gauge opinions regarding issues of importance to constituent groups.
  - d) Employees will receive mandatory biannual training in identifying and properly responding to allegations of bullying and sexual harassment.

### **2. Governance and administration**

- Completed
  - a) Videos of Governing Board meetings have been available on the pima.edu website since 2012, and the College is experimenting with live streaming of the meetings.
  - b) Since fall 2012 the College has contracted with an outside company to provide employees a way to submit comment and concerns regarding College ethics, compliance, and other issues while remaining anonymous if they choose. Concerns are reviewed and resolved by the Director of Internal Audit. The service provider is EthicsPoint, Inc., a national firm that helps more than 400 colleges and universities maintain high ethical standards.

- c) In April 2012 the College hired as Director of Internal Audit a veteran auditor with nearly 20 years' experience in the public and private sectors, including two years as the director of public policy and ethics for the world's premier internal auditing professional association.
  - d) In June 2012 the College adopted changes to the Personnel Policy Statement regarding standards of employee conduct, the whistle-blowing process, and expanded avenues for employees to report complaints regarding the Chancellor.
  - e) In January 2013 the College hired a general counsel whose responsibilities are separate from but complement those of the Board's counsel and other PCC attorneys.
- In Progress
    - a) The Governing Board's search for a new chancellor is notable for inclusiveness and transparency. The process is being driven by a Search Advisory Committee that was formed after the Board solicited public nominations. The committee includes representatives of two groups that have been critical of the College in order to get the widest range of insights regarding the selection of the new chancellor. Additionally, the Board directed the College to create a webpage containing news and other resources related to the search, as well as a dedicated email to send questions and insights to Board members.
    - b) After receiving input from the community and PCC faculty, the Interim Chancellor and Provost have recommended to the Governing Board that the College suspend placement and registration standards for a year. "At this time, we believe it would be in the best interests of the College to step back and re-examine how we ensure that our students are appropriately prepared for the rigors of college level work and equipped with the tools necessary to succeed," the Interim Chancellor and Provost wrote to the Board. The Board has scheduled a meeting for March 29, 2013 to act on the recommendation.
  - Planned
    - a) With the guidance of the Association of Community College Trustees, the Governing Board will review its bylaws and Code of Ethics and make changes needed to remedy deficiencies.
    - b) Governing Board members will receive training in identifying and properly responding to allegations of sexual harassment made against PCC employees.
    - c) The Governing Board will strengthen its oversight of the Chancellor position through an in-depth annual evaluation featuring clearly defined performance targets. Future Chancellor's contracts will not include a rollover provision.

### **3. Finance**

- Completed
  - a) In 2012, the College strengthened controls over time and leave approvals through a web-based electronic timesheet system.
- In Progress
  - a) The College is finalizing enhanced training for employees on purchasing in order to emphasize the importance of competitive procurement and discourage noncompetitive requests.

- b) The College is proposing a daylong conference for staff involved in grants-related activities that includes training on unallowable costs, understanding grant agreements and complying with program requirements.
  - c) The Director of Internal Audit is conducting a comprehensive review of contracting and procurement processes.
- Planned
    - a) The Governing Board will include a standing agenda item to review sole-source contracts of less than \$100,000.
    - b) The Director of Internal Audit will oversee a self-assessment of internal controls.

#### **4. Human Resources**

- Completed
  - a) In 2010, the College hired a Vice Chancellor with a strong background in human resources.
- In Progress
  - a) The College is revising its policies on harassment.
  - b) Development of an employee grievance process is being prepared with input from faculty and staff representatives.
- Planned
  - a) The College will conduct a comprehensive examination of Human Resources policies, practices and procedures that might include enlisting the services of an external HR professional/consultant.
  - a) The College intends a comprehensive review of Standard Practice Guide 4201-BA, regarding filling regular, vacant positions.
  - b) The College will offer a mentoring program for all new faculty, adjunct faculty and staff hires in order to provide employees the guidance of respected members of the community in successfully navigating the workplace.
  - c) Employees facing disciplinary action will be assigned an advocate to help them better understand the discipline process.
  - d) HR will examine procedures in order to give internal applicants the opportunity to apply for positions above current grade before positions open to the public