



PimaCountyCommunityCollegeDistrict

Office of the General Counsel

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Sylvia Manning, President
Higher Learning Commission
230 South LaSalle St., Suite 7-500
Chicago, IL 60604-1411

Via electronic mail: smanning@hlcommission.org

Dear President Manning:

On behalf of Pima Community College (the “College”), I submit this response to the Higher Learning Commission Fact-Finding Team Report and your recommendation. The collective response reflects the contributions of administrators, faculty, and staff as well as input from external partners and community members.

The College appreciates the value of an independent review like the one conducted by the Higher Learning Commission Fact-Finding Team. We understand the serious nature of the situation and acknowledge the need to fix areas at the College. The College is committed to working with the Higher Learning Commission (“HLC”) to meet all accreditation standards. While we do not agree with all aspects of the Report, the College accepts that the Report appropriately identifies areas needing correction. We will use the Report as a roadmap for making needed changes.

Previously, during the fall 2010 comprehensive evaluation, HLC identified deficiencies in Student Learning Outcomes at the College. Prior to the 2013 deadline set by HLC, the College made significant progress in this area and received praise from HLC for the level of improvement. We will devote the same efforts to addressing the concerns expressed in the recent Report. The College is committed to achieving institutional governance of the same high quality as its education services and academic programs.

The first necessary step for making corrections is an accurate assessment of the facts. The Report provides an important initial view, but contains some errors and is not comprehensive enough to serve as the sole basis for identifying and implementing needed solutions. In the enclosed response, the College identifies errors in the Report. While we think it important to respond in detail to correct the factual record, we wish to emphasize that the College does not dispute that there have been shortcomings and that significant change is necessary in the areas identified by the Report.

With respect to a number of items identified in the Report, the College has taken some corrective action and is working on more. We recognize that additional change is needed and significant work remains. Accompanying this response is a list of action items completed or underway. We also take this opportunity to address the three Criteria for Accreditation referenced in the March 15, 2013 letter that accompanied the Report.

Letter to HLC

1. Criterion One, the institution's mission; Criterion Five, collaborative processes

The College affirms commitment to its educational mission and has no intent to change the mission. The changes to placement standards resulted from College concerns about the number of students who tested at a 7th grade or lower proficiency in key areas. Revision of the placement standards was part of an attempt to improve the chances for success of these students in college level courses. The College received many perspectives regarding placement standards from within the College and from the community at large. Some viewed the placement standards as negative and some viewed them as positive. We acknowledge that the process that resulted in the change was not adequate and that further study and consultation with faculty and staff, interested community members, and other educational institutions is necessary prior to making a change of such significance.

Accordingly, at the Board meeting on March 25, 2013, the administration recommended suspension of the revised placement standards for the 2013-2014 academic year and a return to the prior standards. During the upcoming year, the College will engage in a collaborative process to determine what changes, if any, should be made regarding placement. The Board has scheduled a public meeting for March 29 to make a decision on the recommendation. We will report the decision to HLC.

2. Criterion Two, operating with integrity

The Report expressed concerns about prior contracting and procurement practices. The Arizona Auditor General shared similar concerns. In response, the College prepared a corrective action plan and implemented changes to policies and practices. We expect the Auditor General to assess compliance in its next review. In addition, beginning in October 2012, the Director of Internal Audit began a comprehensive review of contracting and procurement procedures. That review is nearly complete and the College expects further changes will be made based on the Director's recommendations. Early this calendar year, the Director identified the benefits of conducting an internal controls assessment for all units. This review will take place during the fiscal year beginning July 1, 2013. The College expects the review will guide further improvements to management and financial controls. The Director and recently hired General Counsel are scheduled to present recommendations to the Chancellor's Cabinet at its April meeting for improvements to the compliance review process. As noted above, we share this information not to assert that all items have been fixed, but rather to demonstrate that the College has recognized shortcomings and taken steps to address them.

3. Criterion Five, planning

The primary concerns expressed with respect to this Criterion relate to administrator assignments and procedures for responding to complaints. A comprehensive review and redrafting of the policies in these areas began some time ago with participation by administrators, faculty, and staff. In accordance with College policy, the proposed policies will be made available for public comment for 21 days before being finalized. We recognize that implementation of the new policies will require appropriate training.

We are deeply concerned that the proposed recommendation of probation is not tailored to addressing the specific concerns about governance identified in the HLC report. Academic quality was not identified as

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an area of concern. However, probation would have significant, negative impacts on our students and create unwarranted doubts about the quality of the educational services provided by the College.

We also note that placing the College on probation would require a comprehensive review and report process within the next two years, including the academic and educational programs that are not the subject of concern in the Report. Preparing for this type of comprehensive review of all areas would divert College resources from the specific areas that need to be fixed in accordance with the HLC Report. For these reasons, we believe HLC should consider two alternatives: (1) require the College to submit a detailed corrective action plan on the specific items identified in the Report and conduct further monitoring to ensure necessary changes are made in a timely manner; or (2) issue a Notice. Either action would also ensure necessary change is made without casting a stigma on the students and educational programs.

As you know, the Interim Chancellor will step down on April 12 and a new Interim Chancellor will be announced shortly. The College remains on track to complete its national search for a new Chancellor to begin July 1, 2013. The Search Advisory Committee includes broad representation from the community, including groups such as C-FAIRR that have raised important concerns about the College. A top priority for the new leaders will be addressing the items identified by HLC and instituting needed change. We ask that HLC partner with the College to improve its institutional governance, rather than impose the sanction of probation. Change is underway at the College and leadership is committed to fully satisfying HLC standards. Thank you for this opportunity to share information with HLC for its consideration.

Very truly yours,

Jeffrey S. Silvyn
College General Counsel

Enclosures

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PCC Board