



April 16, 2013

Dr. Zelema Harris, Chancellor (Interim)
Pima County Community College District
4905C E. Broadway Blvd.
Tucson, AZ 85709-1005

Dear Chancellor Harris:

This letter is formal notification of the action taken concerning Pima County Community College District (“the College”) by the Higher Learning Commission Board of Trustees (“the Board”). At its meeting on April 6, 2013, the Board placed the College on Probation because the institution is out of compliance with the Criteria for Accreditation as 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 complaints the Commission received, the institution’s response to the complaints, the fact-finding visit team report, the institution’s response to that report, and related materials.

The College is required to host a comprehensive evaluation visit no later than September 2014 to determine whether the concerns of the Board identified in this action have been fully resolved and the Criteria for Accreditation have been met.

The College is required to file a comprehensive self-study report no later than July 2014, or eight weeks prior to the comprehensive evaluation, providing evidence that the College has resolved the concerns of the Board identified in this action and providing evidence that the College meets the Criteria for Accreditation, the Core Components, and the Assumed Practices.

In addition, the College is required to file a monitoring report no later than August 1, 2013, outlining a plan by which it will establish conformity with Assumed Practices A.4 and B.2.c by July 2014.

The Probation sanction will remain in place until the conclusion of the comprehensive evaluation process, which includes a review by an Institutional Actions Council hearing committee subsequent to the team visit, and until the Board, at its February 2015 meeting, reviews and acts on the reports of the visiting team and the Institutional Actions Council hearing committee. At that time, the Board will determine whether the College has demonstrated that it is in compliance with all Criteria for Accreditation and whether Probation can be removed and accreditation continued, or, if the College has not demonstrated compliance, whether accreditation should be withdrawn.

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

Pima Community College (“the College”) is out of compliance with Criterion Two, Core Component 2.A, “the institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows fair ethical policies and processes for its governing board, administration, faculty, and staff,” for the following reasons:

By failing to follow its own policies on fair bidding on institutional contracts the College did not operate with integrity. The fact-finding team found that members of the senior leadership in the College followed the former Chancellor’s instructions to form these contracts without questioning the lack of fair bidding or insisting that College policy be followed. The Board of Governors appears to have no processes in place to adequately oversee these financial practices. The Arizona Auditor General’s recent financial audit of the institution also identified concerns with financial management. In addition to the contracted services under review by this team, the Auditor General found “significant deficiencies” in the institution’s internal financial controls.

The College has also not operated with integrity in its handling of personnel policies and procedures and implementation of those policies and procedures. The fact-finding team found that the processes by which administrators are hired, terminated, and reassigned are not clearly stated and are not understood by the institution’s personnel. Many policies, including the sexual harassment policy, have not been updated for more than a decade. Senior administrators do not appear to have enforced and applied institutional policies consistently and uniformly.

The College has not operated with integrity in that it failed to conduct a timely investigation of numerous serious allegations related to the former Chancellor and his conduct. The fact-finding team found that the institution’s Board of Governors failed to conduct a prompt serious investigation or otherwise take timely action when it was aware of serious allegations against its Chancellor related to his behavior towards the institution’s employees.

The College is out of compliance with 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,” and Core Component 5.C, “the institution engages in systematic and integrated planning,” for the following reasons:

The College did not engage appropriately or collaboratively with faculty and administration when it failed to involve these constituencies meaningfully as it changed its admissions policies over public opposition; this failure was in regard to an important institutional decision with a clear effect on the academic program. Senior administrators had used administrative protocols to curtail discussion among the College’s constituents regarding the proposed policy change (Core Component 5.B).

The College's Board of Governors had not engaged in regular review and updating of the College's financial and personnel policies and procedures and had not taken steps to ensure that policies and procedures then in effect in such areas as contracting and sexual harassment were appropriately followed at all levels. Moreover, the College's Board of Governors had not routinely revised and updated its own policies and procedures and lacked a robust committee structure to provide oversight of human resources or other functional areas of the College. The fact-finding team noted a culture of fear and retribution that pervaded the administration of the College. Finally the fact-finding team, as previously noted, found that the Board of Governors did not act with regard to the former Chancellor after it had become aware of allegations of misconduct. These findings further indicate a situation in which the College failed to have effective structures for consultation and collaboration and failed to exercise leadership effectively (Core Component 5.B).

The College has not engaged in appropriate systematic and integrated planning. The College's use of interim and acting administrative leaders and constant turnover in administrative positions led to reports from senior administrators during the fact-finding visit of discontinuity in meeting institutional goals. This administrative instability appears to have made it difficult for the College to engage in the systematic and integrated planning activities required by this Criterion. The fact-finding team noted that the culture of fear and retribution further limited the institution's ability to engage internal and external constituents in systematic planning. Key stakeholders were not sufficiently involved in the discussion or evaluation of the change in mission and degrees offered (Core Component 5.C).

The College is out of conformity with Assumed Practice A.4, "The institution provides clear information regarding its procedures for receiving complaints and grievances from students and other constituencies, responds to them in a timely manner, and analyzes them to improve its processes" because the fact-finding team found that College did not respond to allegations and complaints about the former Chancellor in a timely manner and following appropriate and up-to-date policies and procedures.

The College is out of conformity with Assumed Practice B.2.c, "Faculty participate substantially in oversight of the curriculum—its development and implementation, academic substance, currency, and relevance for internal and external constituencies" because the fact-finding team found that faculty did not participate substantially in the review and adoption of the new admissions policy.

In addition, while not grounds for the Probation sanction, the Board found that the College changed its admissions policy without adequate internal engagement and support and despite community opposition, failing to achieve consensus or broad understanding of the new purpose. In consequence the College now lacks an accepted, shared understanding of its stated mission of serving its community, which raises questions about the College's ability to comply in the future with Criterion One, Core Component 1.A," the institution's mission is broadly understood within the institution and guides its operations" without institutional attention to this issue. In addition, this change in policy appears to have been an effective change in mission that

should have been preceded by a formal application to the Commission and Commission approval of that proposed change in mission.

I am enclosing an updated Statement of Affiliation Status that reflects changes to the affiliation of Pima County Community College District determined by the Board as outlined in this letter, and a current Organizational Profile.

Commission policy 2.5(b)2, Disclosure of Probation 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 Probation 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 your staff liaison, Karen J. 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.

The enclosed Public Disclosure Notice will be posted to the Commission's website within 24 hours of your receipt of this letter. 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,



Sylvia Manning
President

Enclosures: Statement of Affiliation Status
Organizational Profile
Public Disclosure Notice

cc: Chair of the Board of Pima County Community College District
Fact-finding visit team members
Specialized and professional accrediting agencies
Mary Ann Martinez Sanchez, Vice Provost, Pima County Community College District
Kay W. Gilcher, Accreditation and State Liaison, Office of Postsecondary Education,
U.S. Department of Education
Karen J. Solomon, Vice President for Accreditation Relations, Higher Learning
Commission
Karen L. Solinski, Vice President for Legal and Governmental Affairs, Higher Learning
Commission

STATEMENT OF AFFILIATION STATUS

PIMA COUNTY COMMUNITY COLLEGE DISTRICT

4905C E. Broadway Blvd.
Tucson, AZ 85709-1005

Affiliation Status: Candidate: 1972*

Accreditation: (1975-), On Probation as of (4/6/13)

Nature of Organization

Control:

Public

Degrees Awarded:

Associate's

Conditions of Affiliation:

Stipulations of Affiliation Status:

None.

Approval of New Additional Locations:

Prior Commission approval required.

Approval of Distance and Correspondence Courses and Programs:

The institution has been approved under Commission policy to offer up to 20% of its total degree programs through distance education. The processes for expanding distance education are defined in other Commission documents.

Accreditation Activities:

Monitoring Report: 08/01/2013; A monitoring report no later than August 1, 2013, outlining a plan by which the College will establish conformity with Assumed Practices A.4 and B.2.c by July 2014.

Probation Report: 07/31/2014; The College is required to file a comprehensive self-study no later than July 2014 providing evidence that the College has resolved the concerns of the Board identified in this action and providing evidence that the College meets the Criteria for Accreditation. Additional Location Confirmation: 2012- 2013; A visit to Pima Community College, 29th St. Coalition Center at 4355 East Calle Aurora, Tucson, AZ 85711 within six months of matriculation of students and initiation of instruction.

Probation: 2014- 2015; The College will host a comprehensive evaluation no later than September 2014 to determine whether the concerns of the Board identified in the Probation action have been fully resolved and the Criteria for Accreditation have been met.

Summary of Commission Review

Year of Last Reaffirmation of Accreditation:

2010- 2011

Year for Next Reaffirmatioll of Accreditation:

2014-2015

Last Date of Information Change:

04/06/2013

Probation:

See Public Disclosure Notice.

Last Modified: 04/06/2013

Printed: 04/16/2013

ORGANIZATIONAL PROFILE

PIMA COUNTY COMMUNITY COLLEGE DISTRICT
4905C E. Broadway Blvd.
Tucson, AZ 85709-1005

Enrollment Demographics (by headcount) (HLC Posted: 04/26/2012)

	Full-Time	Part-Time
Undergraduate:	13730	23239
Graduate:	0	0

Educational Programs (HLC Posted: 05/23/2012)

		Program Distribution	Total Awarded
Leading to Undergraduate degrees:	Associate	65	2283
	Bachelors	0	0
Leading to Graduate degrees:	Masters	0	0
	Specialist	0	0
	Doctoral	0	0
Certificate Programs:		117	2568

Dual Enrollment (HLC Posted: 04/26/2012)

Headcount in all dual enrollment (high school) programs 811

Off-Campus Activities (HLC Posted: 01/14/2013)

In-State: Campuses: Tucson (Community Campus); Tucson (Desert Vista Campus); Tucson (Downtown Campus); Tucson (East Campus); Tucson (Northwest Campus); Tucson (West Campus)
 Additional Locations: Tucson (Davis-Monthan Air Force Base) ; Tucson (Pima Community College 29th St. Coalition Center)

Out-of-State: Campuses: None
 Additional Locations: None

Out-of-U.S.: Campuses: None
 Additional Locations: None



**Public Disclosure Notice on
Pima County Community College District**
Tucson, Arizona
Effective: April 6, 2013

Pima County Community College District (“the College”) in Tucson, Arizona, is accredited by the Higher Learning Commission; it has been placed on Probation.

Understanding Probation

Probation is public status signifying that conditions exist at an accredited institution that make it no longer in compliance with one or more of the Commission’s Criteria for Accreditation. The period of probation is not more than two years, commencing with the date that the Board placed the institution on probation. During the probation period, the university’s accreditation status continues and it has the opportunity to remedy the concerns that led to the probation.

Recent Board Action

On April 6, 2013, the Higher Learning Commission placed Pima County Community College District on Probation. The Commission’s Board of Trustees took this action because of concerns related to integrity, financial management, personnel policies and procedures, shared governance, Board oversight of the institution, and systemic and integrated planning. The Board based its action on the findings of an evaluation conducted as a result of complaints received by the Commission about the College.

The Criteria for Accreditation (effective January 1, 2013) identified in the Board’s action as not being met are: **Criterion Two, Core Component 2.A**, “the institution operates with integrity in its financial, academic, personnel, and auxiliary functions; it establishes and follows fair ethical policies and processes for its governing board, administration, faculty, and staff”; **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,” and **Core Component 5.C**, “the institution engages in systematic and integrated planning.”

Next Steps

The College is required to file a monitoring report no later than August 1, 2013, outlining a plan by which it will establish conformity with the Commission’s Assumed Practices related to complaints and grievance procedures (Assumed Practice A.4) and to faculty oversight of the curriculum (Assumed Practice B.2.c) by July 2014. The College is also required to file a comprehensive self-study no later than July 2014 or eight weeks prior to the comprehensive evaluation. The self-study must provide evidence that the College has resolved the concerns of the Board identified in the Probation action and evidence that the College meets the Criteria for Accreditation.

The College will host a comprehensive evaluation visit in Fall 2014. At its meeting in February 2015 the Board will review the Probation Report and the report of the evaluation visiting team to determine whether the College can be removed from Probation. If the College has not resolved the Board's concerns that led to the imposition of Probation and demonstrated that it is in compliance with all the Criteria for Accreditation, other action may be appropriate.

About the Higher Learning Commission

The Higher Learning Commission accredits more than 1,000 colleges and universities that have a home bases in one of 19 states that stretch from West Virginia to Arizona. The Commission is a private, nonprofit regional accrediting agency. The Commission's mission is to assure and advance the quality of higher learning. It is recognized by the U.S. Department of Education and the Council for Higher Education Accreditation. The institutions the Commission accredits include public, private not-for-profit, and proprietary institutions at degree levels from the associate's through the doctoral degree level and from small, specialized institutions through large research universities.

Students, parents, and others from the general public with questions regarding the Commission's work should contact John Hausaman at the Higher Learning Commission by email at info@hlcommission.org or by phone at 312-263-0456.

4/16/13