

EXHIBIT S

Pima Community College
Institutional Response
July 8, 2022

HIGHER LEARNING COMMISSION
INSTITUTIONAL ACTIONS COUNCIL

office. Additionally, the new sexual harassment policy has been singled out for stand-alone training, which has been provided to the Board, training delivered to the board, senior administrators and mid-level managers and an Office of Dispute Resolution incepted. The Office of Dispute Resolution serves as the single portal for any complaints and was fully functional at the time of the accreditation visit. That office oversees a third party ethics hot line that has been put in place and has created a tracking mechanism for complaints and their status through the resolution stage, which includes closing the feedback loop with the complainant.

- Administrators, Directors, and Advanced Program managers were engaged in July 2014 to review policy and procedure updates. The campus presidents' retreat in June 2014 developed an orientation program for new campus presidents that will include a primer on college policies, regulations, standard practice guides and other policy documents.
- Policies and procedures now are in place that clearly spell out the Board's duties when receiving any complaint, including one against the Chancellor or fellow Board members. The Office of Dispute Resolution is the sole manager of the complaint process and answers only to the College's internal auditor. The Director of the Office of Dispute Resolution is afforded the authority to call in an independent third-party auditor if deemed appropriate and necessary. These actions appear to be achieving the intended outcomes in terms of addressing previously stated HLC concerns; yet, they are relatively new. Thus, it is key that further evidence of their intended effects over a larger time span be documented.
- PCC adopted a Chancellor Evaluation Process that clearly defines what is expected from its Chief Executive Officer. The College has provided sexual harassment training for its Board and employees, and it has revised its protocols for investigating complaints to prevent conflicts of interest that may hinder and impartial investigation. BP-1103: *Delegation of authority to the Chancellor* requires the Board to evaluate the Chancellor annually and identifies two key sources of information – those being, input for the Chancellor and input from the employees, students and community.
- The current Director of Internal Audit has been in place since April 2012. The Director is a Certified Internal Auditor. This current department is staffed with the incumbent Director, one temporary auditor, and one full-time staff auditor that is to be hired at some future point. The College's new Office of Dispute Resolution also reports to the Director of Internal Audit and is staffed with a director and full time investigator. The Auditor created a 2014/2015 Engagement Plan divided into three types:

Operational Audits

- Clery Act
- Fair Labor Standards Act
- Health Insurance Portability and Accountability Act

Special Reviews

- Veteran's Benefit Compliance Review Follow-up Audit
- Title IV Program Review Follow-up Audit
- Aviation Controls Follow-up Audit
- Contracts and Procurement Follow-up Audit

Other Services, Duties, and Special Projects

- Fiscal Year 2013/2014 Carry over Contract and Aviation
- Compliance Coordination Committee Participation

Disaster Recovery and Business Continuity
HLC Self Study and Site Visit Preparation
Governance Special Project
Management and/or Board Requested Special Reviews, Audits
Investigations

- Under the direction of the internal auditor, a new Office of Dispute Resolution is established for the purpose of investigating complaints from students, faculty and staff. The complaint may be submitted via a call, email or and online form via Ethics Point reporting mechanism. Upon receipt of an issue, the Office of Dispute Resolution will review the complaint, determine if an investigation is necessary, and enter the issue into a tracking mechanism, as appropriate. At the conclusion, a report will be prepared detailing the outcomes, findings, and/or recommendation for resolution. The Office of Dispute Resolutions investigated 57 complaints in 2013 and 27 cases thus far in 2014. As documented through the tracking mechanism the vast majority of cases have been resolved and, thus, considered to be addressed. The process has included closing the feedback loop with the complainant. At the time of the site visit six cases were still in the investigative process or had been deemed to be personnel matters and thus, channeled on to the appropriate supervisor to be addressed.
- Pima has undertaken changes in its purchasing processes especially as it relates to non-competitive purchases. The college categorizes its purchases into three groups that include PCC bids, Cooperative Agreements that are aligned with the State of Arizona, competitively bid contracts available through cooperative agency agreements and non-competitive purchasing requests. For the fiscal year of 2014, the college engaged in \$52.1 million in agreements. For this fiscal year 16 of these purchases were non-competitive for a total value of \$3.2 million or approximately 6% of total purchases. Of the total \$3.2 million in non-competitive contracts, \$2.5 million were for legacy systems and software to support Apple computers, its Oracle database, and similar enterprise-wide software.
- The institution now has the infrastructure in place that includes a comprehensive array of policies and procedures that provides for appropriate guidance to ensure ethical and responsible actions in the area of human resources. The Board of Governors has undertaken an aggressive approach to review and revise the existing Board by-laws and policies. Documentation of discussion and approval of revisions and additions are reflected in Board minutes and videos of respective Board meetings. The by-laws and policies are readily accessible on the College's website. That said the amended and new by-laws and policies have been implemented only recently, with some still to be reviewed, revised and approved. Thus, there will need to be an extended period of time for the intended outcomes to be assessed systematically.
- The Standard Practice Guide (SPG) for filling authorized vacant regular positions has been revised to ensure a defensible process is followed that is fair and equitable for applicants. Additionally, procedures have been revised/developed to outline the process for interim and acting appointments. The SPG does provide for direct appointments (absent a search process) in certain situations; however, safeguards have been put into place to ensure such appointments are only made in limited situations. For instance, written justification is required from the requesting department and approval by the vice chancellor for human resources and the chancellor are required. Since July 1, 2013, six direct appointments have been made, including one acting assignment and two appointments at the administrative level. A review of the justification documentation in support of these appointments indicates that these appointments are consistent with policy guidelines.
- Additionally, in an effort to increase transparency and fairness in the hiring process, the college has provided opportunities for greater participation of faculty and staff on a number of high-level search committees. A review of the composition of a number of recent search committees for several