



PALO VERDE COLLEGE

WHERE KNOWLEDGE TAKES ROOT AND OPPORTUNITY GROWS

July 31, 2026

Dr. Mac Powell, President
Dr. Kathleen Burke Chair
ACCJC (Accrediting Commission for Community and Junior Colleges)
428 J Street, Suite 400
Sacramento, CA 95814

RE: Action Letter, March 23, 2026

Pursuant to your letter of March 23, 2026, attached is evidence of policies and procedures of a foundation for compliance with Standards 4.3, 4.5, and 4.6 including ER Items 4 and 7.

Standard 4.3: Do Administrative and Board processes, deliberations, and decisions support a climate of collaboration and innovation that advances the mission and promotes successful outcomes for all students?

Standard 4.5: Does the board appropriately delegate authority to the College CEO to implement board policies and ensure effective operations and fulfillment of the institutional mission?

Standard 4.6: Does the Board follow its established Board Policies and Administrative Procedures in order to ethically function as a collective entity in the best interest of the institution and independent of undue influence? Does the Board follow documented procedures for self-governance, and does it appropriately address behavior that does not align with its policies?

Regarding compliance with Standards 4.3, 4.5, and 4.6 the district has been out of compliance beginning in 2023 and remaining through May 2026. Beginning in 2022, the membership of the Board of Trustees began to fracture and significant executive leadership turnover at the college began.

A chronology of the Board and College leadership turnover and upheaval is attached as evidence of the disruption to normal and consistent operations of the district during the period 2022-2026. This resulted in a perfect storm of a lack of training for the Board:

- There was no onboarding for new Board members leaving Board roles unclear and uncertain.
- The Board became split and did not act as a single Board, but rather two different units.

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- The death of the two senior members of the Board, and the resignation of another left vacancies to be filled outside the regular election cycle. Filling these vacancies caused greater division on the Board.
- Elections have been held since, and appointees remained as incumbents.
- The turnover for Executive leadership at the college, at times without full Board agreement, caused parallel distrust among staff and the Board, resulting in members of the Board becoming activists in monitoring the operations of the college.
 - Specifically, the Board directed personnel actions around the recommendations of the CEO.
 - Pattern of infighting among Board members.
 - Directed the daily actions of staff.
 - Directed disciplinary actions such as administrative leaves, dismissals, and refusal to support appointments.
 - Directed the production of reports and data of college operations without requesting such through the CEO.
 - A myriad of hostile environment, retaliation and discrimination complaints have followed; within staff and against Board members. These are currently under investigation.

The following are the steps the Board has taken, voluntarily since receiving the action letter from the Commission in March of 2026.

- May of 2026 the Board hired an external, experienced, retired CEO to direct the operations of the college.
 - CEO working with the Board President on Brown Act requirements and conducting Board meetings efficiently and effectively.
 - CEO working with Board members on appropriate Board roles
 - CEO opening regular and consistent communication with Board members
 - CEO meets regularly with Board members to restore trust.
 - CEO communicates with the Board on the importance of compliance with Commission standards and impact on the college.
- ACCT has been commissioned to conduct a comprehensive search for the next permanent CEO. ACCT is guiding the institution through the process. As of this writing, the pool of applicants is of sufficient size that selecting a new CEO for a September 2026 start is probable.
- ACCT has been engaged and has scheduled a Board working study session and retreat for August 25, 2026, for Board training on Board roles, specifically Standard 4, and onboarding a new CEO.
- Four seats of the Board are up for election in the November General Election at least one incumbent is not seeking reelection.



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SUMMARY FOR STANDARD 4

Until just the past few years, Palo Verde College had a history of compliance with Standard 4, practicing appropriate Board roles and in supporting the authority of the CEO. Unusual circumstances impacted that compliance, but the Board is taking positive steps to correct the situation.

The extensive turnover of Board members, without effective onboarding and orientation, produced a Board split incapable of achieving consensus. This resulted in a catastrophic turnover of Executive leadership both in the CEO and Vice-Presidency roles, also without proper onboarding and orientation, creating an environment of distrust, ineffective communication, and low morale across the entire institution.

The steps being taken by the Interim CEO, and ACCT consultants in the CEO search process, Board study sessions, and the onboarding of a new CEO in September of 2026, will reinforce the need for change and renew compliance with Standard 4 and relevant eligibility requirements.

Policy on Institutional Integrity and Ethics, Item 4: Do the institution's policies and procedures effectively prevent conflict of interest in governing-board decision making? Do the institution's policies and procedures effectively provide due process protection to employees, as appropriate?

Palo Verde Community College District (PVCCD) has established a comprehensive framework of Board Policies (BP), Administrative Procedures (AP), and governance documents that support institutional integrity, ethical conduct, and accountability. The District's governance structure includes policies addressing conflicts of interest, delegation of authority, ethics, collegial governance, whistleblower protections, nepotism, purchasing, accreditation, and public transparency. Together, these policies establish clear expectations for ethical decision-making by trustees and employees while reinforcing compliance with California law and ACCJC standards.

To evaluate institutional compliance with the Policy on Institutional Integrity and Ethics, Item 4, the College established an ad hoc Workgroup comprised of representatives from key administrative and governance areas:

- Jaclyn Randall, Administration- Needles Center (Lead)
- Elena Rodriguez, Administration – Human Resources
- Alejandro Clark, Management – Adult Education
- Stephen Ebel, Management- Institutional Research
- Kaylene Elliott, Faculty

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- Eric Taurtala, Classified Staff – Basic Needs
- Sierra Berryman, Student

Evidence reviewed demonstrates that the District has recently updated several key conflict of interest policies, including AP 2710 Conflict of Interest and AP 2712 Conflict of Interest Code, through College Council and Board review. Additional supporting evidence includes annual Form 700 Statements of Economic Interests, the Board of Trustees Handbook, Trusteeship Skills documentation, Independent Citizens' Bond Oversight Committee Bylaws, and the ACCJC Peer Review Team Report. Governing Board meeting minutes also demonstrate implementation of these policies through trustee recusals from agenda items involving potential conflicts of interest, providing evidence that the policies are actively followed during Board deliberations.

The District likewise maintains policies and procedures that provide employees and students with due process protections. These include grievance procedures, discipline and dismissal procedures for academic and classified employees, claims against the District, workplace violence prevention procedures, sexual assault protections, administrator retreat rights, recruitment and hiring procedures, and collective bargaining agreements. Together, these policies establish formal processes for grievances, investigations, disciplinary actions, appeals, and employee rights.

The institutional review also identified opportunities for continuous improvement. Several policies would benefit from routine review cycles, updated procedural language, clearer communication to employees and students, additional accompanying administrative procedures (such as for nepotism), and broader dissemination through employee handbooks, student handbooks, contracts, websites, and annual communications. Specifically, a recommendation is to tag APs dependent on bargaining units to ensure the procedures are reviewed and updated simultaneously when the agreements are renewed. These follow-up actions will further strengthen institutional transparency, employee awareness, and compliance with ACCJC standards while reinforcing the District's commitment to institutional integrity and ethical governance.

While the District has established BPs and APs to prevent conflicts of interest and to ensure due process protections, they are not always being followed. In addition to regular review of BPs and APs, we need to ensure proper training for a variety of stakeholder groups to ensure future compliance and consistent application of these rules.



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Conflict of Interest in Governing Board Decision Making

Policy	Reviewed	Evidence	Follow-up	Timeline
AP 2710 Conflict of Interest	College Council (11/19/24); Board Information (12/17/24)	ACCJC Peer Review Report; Board Handbook; Trusteeship Skills; Provisional Trustee Application	Continue regular policy review and reinforce trustee ethics training.	Fall 2026 and ongoing
AP 2712 Conflict of Interest Code	College Council (11/19/24); Board Information (12/17/24)	California Form 700 filing requirements and public search portal	Continue annual Form 700 compliance monitoring.	Ongoing
BP 2710 Conflict of Interest	Revised – 8/9/22	Governing Board policy	Review and update to maintain compliance with state law.	Fall 2026
BP 2715 Code of Ethics/Standards of Practice	Revised – 11/12/24	Governing Board ethical standards	Continue trustee ethics education.	Fall 2026, ongoing, August 2026 ACCT training
BP 3050 Institutional Code of Ethics	Revised – 10/28/08	Board of Trustees Handbook	Reinforce employee awareness through orientation and annual training. Review/update policy.	Fall 2026, ongoing
BP 7700 Whistleblower Protection	Revised-05/13/14	Board policy	Promote reporting procedures and protections.	Ongoing
BP 7310 Nepotism	Revised-12/17/24	District policy	Develop an accompanying Administrative Procedure describing implementation and complaint process.	Spring 2026, ongoing
AP 2430 Delegation of Authority to Superintendent/President	Reviewed (06/2021)	ACCJC Peer Review Team Report; Board & CEO Roles document	Continue periodic review.	Summer 2026, ongoing



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Due Process Protections for Employees

Policy	Reviewed	Evidence	Follow-up/Internal Recommendations	Timeline
BP 7360 Discipline and Dismissals – Academic Employees	Revised-4/28/09	Board Policy	Review for compliance with current law and bargaining agreements. Update.	Fall 2026
AP 7360 Discipline and Dismissals – Academic Employees	Revised-4/28/09	Administrative Procedure	Review, update, and provide employee communication on an annual basis. Periodic review.	Fall 2026
BP/AP 7365 Discipline and Dismissals – Classified Employees	Revised-10/27/09	Board Policy, Administrative Procedure, CSEA Contract	Review and update procedures and clearly communicate employee due process rights on an annual basis.	Fall 2026
AP 3810 Claims Against the District	Revised-10/08/19	Administrative Procedure and Verified Claim Form	Update form, add review date, and make fillable. Provide link on Human Resources/Employee resource webpage.	Spring 2026
BP 3810 Claims Against the District	10/13/19	Board Policy	Review/update. Conduct routine review and communicate procedures annually.	Spring 2026
Workplace Violence Plan (BP/AP 3510)	BP-12/11/20 AP 11/10/20	Board Policy and Administrative Procedure	Update contact information, review procedures regularly, and distribute annually to employees.	Spring 2026
BP 3540 Sexual and Other Assaults on Campus	4/16/26	Board Policy	Continue annual communication and policy review.	Ongoing
AP 7250-1 Academic Administrators Retreat Rights	Revised-4/28/09 Reviewed-5/16/23	Administrative Procedure	Update terminology and include information in administrator onboarding materials.	Spring 2026
AP 7250-0 Educational Administrators Recruitment and Hiring	2/11/14	Administrative Procedure	Review, update. Continue regular policy review.	Fall 2026
BP/AP 5530 Student Rights and Grievances	4/14/26	Student grievance procedures	Continue regular review and increase visibility through Student Handbook, website, and campus communications.	Ongoing



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Policy on Institutional Integrity and Ethics, Item 7: Does the college effectively implement policies and procedures to address complaints regarding questionable accounting practices or activities to control potential fraud, waste, and/or abuse of fiscal resources?

PVCCD recognizes the importance of maintaining strong internal controls and reporting mechanisms that support ethical conduct, fiscal accountability, and public trust. The District is committed to ensuring that employees, students, and community members have access to clear and effective processes for reporting concerns related to questionable accounting practices, financial misconduct, fraud, waste, abuse, or other violations of institutional policies and standards.

As an immediate step toward strengthening its reporting framework, the District has developed and implemented a [reporting form](#) that is accessible through the Palo Verde College [website](#). The form provides individuals with a direct method for reporting concerns and allows reports to be submitted anonymously. The availability of an anonymous reporting option is intended to reduce barriers to reporting and encourage individuals to come forward without fear of retaliation or adverse consequences.

To further evaluate institutional compliance with the Policy on Institutional Integrity and Ethics, Item 7, the District established an ad hoc Workgroup comprised of representatives from key administrative and governance areas:

- Ger Xiong, Administration – Student Support Services (Lead)
- Eddie Ramirez, Faculty (Co-lead)
- Nancy Hale, Management - Administrative Services & College Advancement
- James Thomas, Administration - Administrative Services and College Advancement
- Christina Dollinger, Management - Financial Aid

The Workgroup was charged with reviewing existing policies, procedures, and reporting practices to determine whether current mechanisms adequately support the identification, reporting, investigation, and resolution of concerns involving potential fraud, waste, abuse, or questionable accounting practices.

The Workgroup assessed the District's existing whistleblower and complaint procedures. The review identified several areas where improvements are needed to align institutional practices with best practices for accountability, transparency, and ethical oversight. Specifically, the Workgroup determined that current [Board Policy \(BP\) 7700](#) does not explicitly reference complaints involving fraud, waste, or abuse of fiscal resources. While the policy addresses whistleblower protections generally, it does not clearly identify financial misconduct as a reportable concern or provide sufficient guidance regarding the reporting and investigation of such allegations.



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The Workgroup also identified limitations within Administrative Procedure (AP) 7700. The current procedure discourages anonymous reporting, which may unintentionally deter individuals from reporting concerns. Additionally, AP 7700 does not provide an independent reporting pathway when allegations involve senior institutional leadership, including the Superintendent/President, a Vice President, and/or a governing board of trustee(s). The absence of an independent reporting mechanism could create perceived or actual conflicts of interest and reduce confidence in the integrity of the complaint process.

To address these findings, the Workgroup recommends a comprehensive revision of BP/AP 7700. The proposed revisions will:

- Explicitly define and address complaints related to fraud, waste, abuse, questionable accounting practices, and the misuse of District resources.
- Strengthen protections for individuals who report concerns in good faith.
- Affirm the District's support for anonymous reporting and clarify that anonymous complaints will be reviewed and evaluated to the extent possible.
- Establish clear reporting channels and responsibilities for receiving, documenting, and investigating complaints.
- Provide independent reporting options when allegations involve senior administrators or members of the governing board.

In addition to revising institutional policies and procedures, the workgroup recommends that Palo Verde College explore the implementation of an external third-party hotline and reporting platform related to fraud, waste, and abuse. This independent reporting mechanism will provide employees and other stakeholders with a secure and confidential avenue to report concerns regarding financial misconduct, ethical violations, fraud, waste, abuse, or other compliance-related matters. The use of an external reporting service will help ensure impartial intake and review of complaints while enhancing confidence in the integrity of the reporting process.

Recognizing that effective policies must be supported by ongoing education and awareness, the District will also implement annual whistleblower and ethics training for Trustees, administrators, and supervisors. The training will focus on reporting obligations, ethical responsibilities, protection from retaliation, fiscal stewardship, and the procedures for responding appropriately to complaints. Through regular training, the District seeks to foster a culture of accountability, transparency, and ethical decision-making across all levels of the institution.

Furthermore, the Workgroup recommends PVCCD to develop a formal complaint management framework that clearly outlines each stage of the process, including complaint intake, documentation, investigation, findings, corrective action, resolution,



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and, when appropriate, notification to the Board of Trustees. The framework should establish timelines, identify responsible parties, and provide guidance for record retention and reporting. Standardizing these procedures will promote consistency in handling complaints and strengthen institutional oversight.

The District anticipates these actions will significantly enhance its ability to detect, investigate, and address concerns involving fraud, waste, abuse, and questionable accounting practices. By strengthening reporting mechanisms, clarifying institutional policies, expanding training opportunities, and implementing independent reporting options, PVCCD is reinforcing its commitment to ethical conduct, fiscal responsibility, transparency, and continuous improvement. These efforts will help ensure that the District maintains effective safeguards for the responsible stewardship of public resources and remains aligned with the expectations outlined in the Policy on Institutional Integrity and Ethics, Item 7.

Timeline for Recommended Action Items

Action Item	Constituency Group	Date
Review and revise Board Policy and Administrative Procedure 7700 Whistleblower Protection	Full Administrative Council, Academic Senate, College Council	December 2026
Form a complaint management framework	Administrative Advancement, Human Resources	December 2026
Implement annual whistleblower and ethics training for the governing Board of Trustees, administrators, and supervisors.	Administrative Advancement, Human Resources, Office of the President	January 2027
Explore the implementation of an external third-party reporting platform/hotline related to fraud, waste, and abuse	Executive Cabinet, Administrative Advancement, Human Resources	January 2027
Explore request for proposal (bids) for external reporting platform	Administrative Advancement	June 2027

Sincerely,

Ed Knudson
Interim Superintendent/President
Palo Verde College

