



PORLAND COMMUNITY COLLEGE BOARD OF DIRECTORS

Business Meeting



February 19, 2026



The Board of Directors meetings are held in accordance with open meeting laws and accessibility requirements. If a person with a disability needs assistance in order to attend or participate in a meeting, please notify the Board of Director's Office at least 48 hours in advance by calling (971) 722-7268 or by email at boardmember@pcc.edu, please use ACCESSIBILITY in the subject line.

Portland Community College
BOARD OF DIRECTORS
PO BOX 19000, Portland, Oregon 97280

February 19, 2026

Sylvania Campus

12000 SW 49th Avenue, Portland, OR 97219, CC Building, Rooms 233 A/B
Streaming Links:

WORK SESSION: <https://portlandcc.zoom.us/j/93637881618>

Or Telephone: +1 253 205 0468 OR +1 346 248 7799 US
Webinar ID: 936 3788 1618

BUSINESS SESSION: <https://portlandcc.zoom.us/j/97308383760>

Or Telephone: +1 253 205 0468 OR +1 346 248 7799 US
Webinar ID: 973 0838 3760

AGENDA

5:00 PM	EXECUTIVE SESSION in accordance with ORS 192.660 (2) (d) labor negotiations and (k) school safety. Media Requests to join the Executive Session can be phoned in to 971.722.7268 or emailed to boardmember@pcc.edu by noon of the meeting date. Please use MEDIA REQUEST in the subject line.
6:15 PM	BOARD DINNER (<i>invite only</i>)
6:30 PM	WORK SESSION Oak/Elm Rooms <ul style="list-style-type: none">• Ending Fund Balance Scenarios
7:15 PM	BUSINESS SESSION Rooms 233A/B Call to Order <ul style="list-style-type: none">• Approval of Agenda — February 19, 2026• Approval of Minutes — January 15, 2026
7:20 PM	PUBLIC COMMENT ON AGENDA ITEMS Persons wishing to make public comment on agenda items can request a time slot by using this link . Details and directions can be found at the link. Deadline for signups: Wednesday, February 18 at 5:00 pm.
7:35 PM	PUBLIC COMMENT ON NON-AGENDA ITEMS Persons wishing to make public comment on agenda items can request a time slot by using this link . Details and directions can be found at the link. Deadline for signups: Wednesday, February 18 at 5:00 pm.
7:50 PM	REPORTS

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- ASPCC Senate President & Student Trustee – Fareeha Nayebare
- PCC Federation of Faculty and Academic Professionals (AFT Local 2277) – Ben Cushing, President
- PCC Federation of Classified Employees (AFT Local 3922) - Jeff Grider, President
- Board Members

8:10 PM **PRESIDENT'S REPORTS AND COLLEGE UPDATES**

- President's Reports
 - Metrics: Winter Enrollment/Student Demographics
- College Updates

8:30 PM **INFORMATION SESSIONS**

OPERATIONAL EXCELLENCE: Efficiency, Effectiveness, and Fiscal Sustainability

- **Biennial Budget Quarterly Update** – Aaron Hill, interim Associate Vice President, Finance
- **PSU/PCC One Stop Transfer Campaign** – Khylie Gardner, Associate Vice President, Marketing and Communications

9:00 PM **CONSENT AGENDA:** (All items will be approved by consent agenda unless an item is withdrawn by request of a member of the Board. A separate motion will then be required to act on the item in question.)

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CONTRACTS

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Full-Time Faculty and Academic Professionals098

26-056 Official Recognition of Classified Employee
Appreciation Week (March 2-6, 2026).....103

9:05 PM **ADJOURNMENT**

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Portland Community College
PO BOX 19000, Portland, Oregon 97280

January 15, 2026

BOARD MEETING MINUTES

ATTENDANCE

Laurie Cremona Wagner, Kien Truong, Brandy Penner, Dan Saltzman, Greg McKelvey, Gina Sanchez Roletto (remote)

EXECUTIVE SESSION

The PCC Board of Directors met in accordance with ORS 192.660 to discuss (d) labor negotiations and (h) litigation.

WORK SESSION

The Board of Directors met in Work Session and briefly reviewed the ASPCC MOU once more to confirm a correction. President Bennings provided the [President's Workplan Q2 Update](#), and the [December Student Success Metrics](#) were recapped due to the abbreviated meeting in December.

BUSINESS SESSION

Chair Penson called the Business Meeting to order at 7:04 pm.

The November 20, 2025 minutes were approved as published. Saltzman/McKelvey
Cremona Wagner – Yes Penner – Yes Sanchez Roletto – Yes
Penson – Yes Saltzman – Yes
Truong – Yes McKelvey – Yes

The December 18, 2025 minutes were approved as published. McKelvey/Penner
Cremona Wagner – Yes Penner – Yes Sanchez Roletto – Yes
Penson – Yes Saltzman – Yes
Truong – Yes McKelvey – Yes

PUBLIC COMMENT ON AGENDA ITEMS

Michael Sonnleitner: ASPCC MOU & PCC Board: In-person

PUBLIC COMMENT ON NON-AGENDA ITEMS

Renee Radix: MSA program cut: Remote

Brian Hardie: MSA program closure: In-person

Erika Anderson: MSA program: In-person

Rachel Brashears: No program/course cuts; In-person

Michael Harrison: Music & Sonic Arts: In-person

Alena Slee; Save Music & Sonic Arts; In-person
Helen Spencer-Wallace; Music & Sonic Arts; In-person
Htet "Harvey" Thura; Save Music & Sonic Arts Program; In-Person
Danielle Davis; Keep Music & Sonic Arts; In-person
Renee Muzquiz; Reversing decision to cut MSA; In-person
Em Harmon; MSA Program Closure; In-person
Andrew Johnson; MSA; In-person
Max Blauer; Save MSA; In-person
Eben Joondepth Hoffer; Music & Sonic Arts Program Reinstatement; In-person

REPORTS

Reports were provided by ASPCC Senate President/Student Trustee, Fareeha Nayebare, Jeff Grider, PCC Federation of Classified Employees (AFT Local 3922); Ben Cushing (AFT Local 2277); Board Members McKelvey, Penner, Saltzman, Cremona Wagner, Penson

PRESIDENT'S REPORTS & UPDATES

The [Metrics for Highest Enrolling Course Success Rates](#) were shared, as was a [media clip](#) noting that the American Council on Education selected PCC for the 2026 Carnegie Classification for Community Engagement. Executive Director of College Relations, Sage Learn, provided a quarterly [Government Relations Update](#). Associate Vice President of People Strategy, Equity & Culture, Dr. Howard Croom, presented the most recent [Personnel Action Report \(PAR\)](#).

INFORMATION SESSION

OPERATIONAL EXCELLENCE: Efficiency, Effectiveness, and Fiscal Sustainability
[2025 Audit Results](#) – Kristin Diggs, Auditor, Eide Bailly
[Annual Comprehensive Financial Report / Financial Update](#) – Dina Farrell, CFO, Jim Crofts, Director of General Accounting

CONSENT AGENDA

Chair Penson proposed approval of Resolutions 26-044 through 26-050.

Saltzman/McKelvey

Cremona Wagner – Yes	Penner – Yes	Sanchez Roletto – Yes
Penson – Yes	Saltzman – Yes	
Truong – Yes	McKelvey – Yes	

ADJOURNMENT

There being no further business, the meeting adjourned at 9:19 pm.

Tiffani Penson, Chair

Dr. Adrien L. Bennings, President

Prepared by:

Jennifer Hamlin, Board Coordinator
Minutes approved on February 19, 2026

February 19, 2026

26-051

COMMENDATION FOR RETIRING EMPLOYEES

PREPARED BY: Julie Kinney, Director, People Data & Systems

APPROVED BY: Dr. Howard Croom, Associate Vice President, People Strategy, Equity & Culture
Dr. Adrien L. Bennings, President

STRATEGIC THEME: Shared Values: People, Connectedness, and Empowerment

REPORT: The President RECOMMENDS that the following employees be recognized for their service:

Retirees	Job Title	Years of Service
Warren Banks	SBDC Advisor	15
Matthew Camp	ESOL Instructor & Tutor	25
Dina Farrell	VP/CFO Finance & Bus Svcs	8
Philippa Kaplan	Community Education Instructor	14
Keith Palmateer	Spec/Library Resource Sharing	36

RECOMMENDATION: That the Board commend these employees for their service to Portland Community College and wish them well in their retirement years.

February 19, 2026

26-052

CONTRACT APPROVAL FOR ROCK CREEK BUILDING 7
MODERNIZATION GUARANTEED MAXIMUM PRICE TO
TRUEBECK CONSTRUCTION INC.

PREPARED BY: John MacLean, Finance & Procurement Manager, Office of Planning and Construction

FINANCIAL
RESPONSIBILITY: Rebecca Ocken, Director, Office of Planning and Construction

APPROVED BY: Josh Peters McBride, Associate VP College Operations
Dr. Katy Ho, Executive Vice President
Dr. Adrien L. Bennings, President

STRATEGIC THEME: Operational Excellence: Efficiency, Effectiveness, and Fiscal Sustainability; Technological Transformation: Agility, Innovation, and Readiness

REPORT: The 2022 Bond Program includes funding for updated classroom, technology, facilities, and equipment to provide students with modern higher education and job training spaces. As part of the 2017 Bond Program the College carried out an assessment of the Chemistry teaching laboratories in Building 7. As a result a first phase project was completed in 2022 to renovate the Organic Chemistry space. The College is now ready to move forward with the second phase to renovate the remaining Chemistry laboratories.

At its February 20, 2025 meeting, the Board, through BR 25-046, approved an exemption from competitive bidding and authorized the use of the Construction Manager/General Contractor (CM/GC) alternative contracting method for this project.

At the January 15, 2026 the Board, through BR 26-045, approved the award of the contract to Truebeck Construction Inc for an early work amendment (EWA) for early procurement in the amount of \$1,833,652.

Truebeck has now provided the GMP for the full scope of work. The proposal is for \$4,070,288 which PCC staff have reviewed and recommend acceptance. This includes the previously authorized early work amendment.

COBID and other certified firms participation at this stage is \$369,969 (14% of contract value) over 7 firms. The breakout and number of firms in each category is shown below. As firms may have multiple certifications the total does not match the number above.

WBE (4 firms)	10.1%	\$278,465
MBE (3 firms)	10.6%	\$293,269
DBE (2 firms)	0.9%	\$24,999
ESB (2 firms)	0.4%	\$11,123
VBE (1 firm)	1.5%	\$41,725

RECOMMENDATION: That the Board of Directors authorize PCC to enter into a contract with Truebeck Construction Inc for the Rock Creek Building 7 Modernization project for up to \$4,477,317 which includes a 10% contingency. Funding will be from the 2022 Bond. This is within the project budget.

February 19, 2026

26-053

CONTRACT APPROVAL FOR CLIMB BUILDING
RENOVATION AND TENANT IMPROVEMENTS TO LEASE
CRUTCHER LEWIS

PREPARED BY: John MacLean, Finance & Procurement Manager, Office of Planning and Construction

FINANCIAL
RESPONSIBILITY: Rebecca Ocken, Director, Office of Planning and Construction

APPROVED BY: Josh Peters McBride, Associate VP College Operations
Katy Ho, Executive Vice President
Dr. Adrien L. Bennings, President

STRATEGIC THEME: Delivery: Redefine time, place, and systems of educational delivery to create a more learner-centric ecosystem; Enterprise: Cultivate a long-term sustainable college enterprise

REPORT: The 2022 Bond Program includes funding for deferred maintenance and updating technology, facilities and equipment throughout the district. As a result of the College's review of space utilization, it became apparent that the CLIMB building was underutilized and could be renovated to accommodate the Office of Planning and Construction (OPC), who currently occupy leased space.

At its July 17, 2025, meeting, the Board, through BR 26-001, approved an exemption from competitive bidding and authorized the use of the Design-Build (D-B) alternative contracting method for this project.

On August 15, 2025, the Request for Proposals (RFP) was advertised in the Daily Journal of Commerce, State of Oregon (OregonBuys), BidLocker, Portland Observer, and the Portland Business Tribune. In addition, OPC staff reached out to all identified COBID registered firms who could provide these services. A total of twenty-two (22) firms attended the mandatory pre-proposal meeting. At the proposal closing time of 2:00 p.m. September 24, 2025, seven (7) proposals were received. No proposals were received from COBID registered firms.

Proposals were reviewed and scored by a selection committee and finalists were invited to interview. The highest scoring proposal was from Lease Crutcher Lewis.

To meet project schedules and have the space ready by Fall 2026, Lewis has provided PCC with an Early Work Amendment (EWA) for the advance ordering of long lead time equipment and early onboarding of key trade partners. The EWA is in the amount of \$799,811 and PCC staff have reviewed the proposal and recommend acceptance. This EWA will be included in the Guaranteed Maximum Price when it is brought to the board.

COBID participation will be provided with the GMP amendment in summer 2026.

RECOMMENDATION: That the Board of Directors authorize PCC to enter into a contract with Lease Crutcher Lewis for the CLIMB Building Renovation project for up to \$879,792 which includes a 10% contingency. Funding will be from the 2022 Bond. This is within the project budget.

February 19, 2026

26-054

AUTHORIZATION FOR AN INTERGOVERNMENTAL
GROUND LEASE WITH HILLSBORO SCHOOL DISTRICT

PREPARED BY: Michael Mathews, Chief Procurement Officer, Strategic Procurement and Contracting

FINANCIAL
RESPONSIBILITY: Josh Peters McBride, AVP College Operations

APPROVED BY: Dr. Katy W. Ho, Executive Vice President
Dr. Adrien L. Bennings, President

STRATEGIC THEME: Operational Excellence: Efficiency, Effectiveness, and Fiscal Sustainability; Shared Values: People, Connectedness, and Empowerment; Academic Excellence: Student Success, Delivery, and Programming; Community Engagement: Workforce, Education, and Industry Alignment

REPORT: The College is collaborating with Hillsboro School District and Virginia Garcia to create a Health and Education Campus, including a building constructed by the College for educational facilities and a health center constructed by Virginia Garcia Memorial Health Center.

The College is requesting authorization to enter into a fifty-year Ground Lease. This agreement will include two additional twenty-five-year extension options, with an annual rent of One Dollar (\$1.00). Portland Community College will construct a building with embedded educational and collaborative spaces focused on College workforce education, including parking and dedicated office and conference spaces for the Hillsboro School District.

RECOMMENDATION: The Board of Directors authorizes the College to enter into a Ground Lease Agreement with the Hillsboro School District for the development of the Block 56 Health & Education Campus.

February 19, 2026

26-055

APPROVAL OF PROFESSIONAL LEAVES FOR FY 26-27
FULL-TIME FACULTY AND ACADEMIC PROFESSIONALS

PREPARED BY: Jennifer Ernst, Ed.D., Vice President, Academic Affairs, Office of Academic Affairs

FINANCIAL
RESPONSIBILITY: Jennifer Ernst, Ed.D., Vice President, Academic Affairs, Office of Academic Affairs

APPROVED BY: Dr. Adrien L. Bennings, President

STRATEGIC THEME: Operational Excellence: Efficiency, Effectiveness, and Fiscal Sustainability; Shared Values: People, Connectedness, and Empowerment; Technological Transformation: Agility, Innovation, and Readiness; Holistic Student Support: Integrated, Affordable, and Accessible; Academic Excellence: Student Success, Delivery, and Programming; Community Engagement: Workforce, Education, and Industry Alignment

REPORT: Applications for professional leave were received and processed in accordance with Article 20 of the Agreement between Portland Community College and the Portland Community College Faculty Federation. The President has reviewed the applications and recommendations of the district-wide administration.

RECOMMENDATION: That the following Portland Community College faculty and/or academic professionals be granted professional leaves for the purpose, time period, and salary payments indicated:

Michele Marden

Full-time Faculty: Math

Three Terms: Fall 2026; Winter 2027; Spring 2027

Salary: 65% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal will include learning coding and the creation of collaborative, group-worthy math problems with corresponding Open Education Resources (OER) homework sets. It may also include content on trauma-responsive teaching, community building, and equitable grading to support student success.

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Operational Excellence (improves operational practice and revenue by retaining students who would have otherwise given up because of math); Shared Values (creates belonging by creating community within the classroom); Holistic Student Support (creates a supportive environment where every student thrives), and Academic Excellence (student-centered approach, quality instruction grounded in inclusive teaching practices).

Megan Savage

Full-time Faculty: Composition & Literature

One Term: Spring 2027

Salary: 100% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal will implement Artificial Intelligence (AI)-literacy focused assignments in a shareable WR 227 Technical Writing shell and revise the AI module in the Reading, Writing, and English Refresher training. Outcomes will be mapped to course objectives, piloted, and shared with Subject Area Committees (SACs) and training teams to support timely, relevant curriculum improvements.

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Shared Values (takes a human-centered approach, rather than a technology or profit-centered approach, foregrounding student and faculty holistically, while exploring AI with open curiosity); Technological Transformation (requires a forward-thinking mindset and instructional readiness/agility, while simultaneously considering sustainability); Holistic Student Support (considers accessibility as well as access and the "digital divide" as part of its consideration of the role of AI in Composition/Technical Writing classrooms); Academic Excellence (is grounded in up-to-date scholarship from a variety of perspectives, largely grounded, but not limited to, Composition & Rhetoric pedagogy in order to support academic excellence and career preparation, as well as inclusive teaching practices); and Community Engagement (involves research into the role of AI in the workforce in a variety of disciplines, and supports students' further/continued research into their own disciplines, preparing them to encounter and adapt to current workforce AI communication demands).

Aaron Payette

Full-time Faculty: Anatomy & Physiology

Two Terms: Fall 2026; Winter 2027

Salary: 75% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal involves developing an accessible image library of human cells, tissues, and organs for Biology 231 Human Anatomy & Physiology I, BI 232 Human Anatomy & Physiology II, and BI 233 Human Anatomy & Physiology III.

With around 500 images, the library will be PCC-owned and enhance teaching, including support for emergency labs.

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Academic Excellence (improving the faculty member's ability and knowledge to teach subject matter, improvement in the resources used for courses, and ensuring the resources created are accessible to all students); Technological Transformation (learning proficiency in the use of a new technology i.e. Keyence microscope with computer interface; and Community Engagement (gaining the public's trust by effective and ethical use of public and private resources by using existing underutilized expensive lab equipment)

Amanda Davis

Full-time Faculty: Interior Design

One Term: Fall 2026

Salary: 100% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal supports the creation and development of five fully accessible modules for the interior design curriculum for Open Education Resources (OER), available in 2027 after review. This proposal continues the work the faculty member started as a recipient of a 2025-2027 Open Education Resource grant.

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Holistic Student Support and Academic Excellence through direct support of Strategic Goal 1 *New Student Onboarding* (additional modules would be available to students at the high school level to increase interest in interior design; once enrolled, these modules would align with the college's First Year Experience, a crucial effort for ongoing student engagement) and Strategic Goal 3 *Implement Guided Pathways* (foundational modules in Interior Design would assist to fully implement Guided Pathways).

Daniel Davis

Full-time Faculty: ESOL

One Term: Winter 2027

Salary: 100% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal will research Artificial Intelligence (AI) tools, address plagiarism, and produce a paper, workshop, and possible pilot to guide departmental AI use. It also aims to develop guidelines for responsible student engagement with AI within the ESOL program.

Relates to PCC's Strategic Plan themes:

This project supports the Strategic Plan themes of Holistic Student Support (creating a sense of belonging among ESOL students, incorporating culturally-relevant materials

and teaching methods supported by AI and Large Language Model [LLM] analytics); Academic Excellence (redefining the systems of educational delivery through the innovative use of technology, creating a more learner-centric ecosystem); and Community Engagement (preparing ESOL students for workforce integration by equipping them with language skills honed by familiarity with modern technological tools relevant in today's job market; developing partnerships with tech companies specializing in educational AI and LLMs can enhance PCC's role as a leader in advancing equitable student success).

Alejandra Bonifacino

Full-time Faculty: Spanish Language and Culture

One Term: Winter 2027

Salary: 100% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal includes relevant activities in Artificial Intelligence (AI)-enhanced teaching and sociolinguistic fieldwork that strengthen digital literacy and culturally responsive learning. It also outlines meaningful college contributions through faculty workshops, integration of findings into language programs, and a clear equity-focused teaching plan.

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Holistic Student Support and Operational and Academic Excellence through direct support of Strategic Goal 1 *New Student Onboarding* (creating inclusive, culturally responsive Spanish instruction that aligns with multilingual, identity-affirming, and accessible learning experiences); Strategic Goal 2 *Fully Implement Strategic Course Scheduling* (developing AI-enhanced curriculum improving course delivery efficiency); Strategic Goal 3 *Fully Implement Guided Pathways* (integrating sociolinguistic research will strengthen Spanish pathway progression and student engagement); and Strategic Goal 4 *Increase Student Scholarships and Funds for Wrap-Around Supports* (fostering equitable, learner-centered pedagogy that enhances access to academic support and promotes student success).

Jamie Heberlein

Full-time Faculty: Early Education & Family Studies

One Term: Fall 2026

Salary: 100% of Annual Scheduled Salary

Purpose of Leave:

This Professional Leave proposal will develop an Early Childhood Leadership course, monthly group coaching, and leadership training for staff, faculty, and students supporting career growth and higher wages for Early Childhood Education (ECE) students (upon faculty member's completion of an Executive Leadership Coach training course).

Relates to PCC's Strategic Plan themes:

This proposal supports the Strategic Plan themes of Holistic Student Support (enhances support via coaching models that remove barriers to success); Academic Excellence (advances the plan's emphasis on Delivery by cultivating a culture of student-focused teaching excellence rooted in culturally responsive, anti-racist pedagogies); and Community Engagement (sustaining programs that lead to living-wage jobs and equitable opportunities through education).

February 19, 2026

26-056

OFFICIAL RECOGNITION THAT CLASSIFIED EMPLOYEE
APPRECIATION WEEK WILL BE CELEBRATED MARCH 2-6,
2026

PREPARED BY: Jennifer Hamlin, Board Coordinator, Office of the President

APPROVED BY: Dr. Adrien L. Bennings, President

REPORT: The College recognizes that education is essential to the future of our community, state, country and world; and the classified employees are an integral part of the services that PCC provides to the students and the community.

They work directly with students, faculty, academic professionals, parents, volunteers, business partners and community members to help provide a good learning environment in the community.

They support the smooth operation of offices, the safety and maintenance of buildings and property, and the safe transportation, healthy nutrition and direct instruction of students.

They, with their diverse talents and true dedication, support the nurturing of students throughout the academic years.

RECOMMENDATION: That the Board of Directors proclaim March 2-6, 2026, to be CLASSIFIED EMPLOYEE APPRECIATION WEEK and that the Board of Directors strongly encourage all members of our community to join in this observance, recognizing the dedication and hard work of these individuals.

It is against the College's policy for any manager, supervisor, faculty member, staff member, or student to engage in prohibited harassment or discrimination of any member of the College community. PCC adheres to all federal, state, and local civil rights laws and regulations prohibiting discrimination in public institutions of higher education, including applicable provisions of the Civil Rights Act of 1964 (as amended); related Executive Orders 11246 and 11375; Title IX of the Education Amendments Act of 1972; Section 504 of the Rehabilitation Act of 1973; Titles I and II of the Americans with Disabilities Act of 1990 (as amended); the Age Discrimination in Employment Act, the Uniformed Service Employment and Reemployment Rights Act, and all applicable federal, state, and local civil rights laws. PCC does not discriminate against any employee, applicant for employment, student, or applicant for admission on the race, color, religion, national origin, sex, marital status, disability, veteran status, age, sexual orientation, or any other status protected by federal, state, or local law including protections for those opposing discrimination or participating in any resolution process on campus, with the Equal Employment Opportunity Commission or other human rights agencies. This policy covers nondiscrimination in both employment and access to educational opportunities. Therefore, any member of the PCC community who acts to deny, deprive, or limit the educational or employment and/or social access, benefits, and/or opportunities of any member of the PCC community, guest, or visitor on the basis of their actual or perceived membership in the protected classes listed above is in violation of PCC's policy on nondiscrimination.